



Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at trainingpackages&VETquality@education.gov.au.

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the [terms and conditions for public submissions](#).

Submission details

1. Submission made on behalf of: Individual Organisation
2. Full name:
3. Organisation (if applicable):
4. Please indicate your interest in this discussion paper:
(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's website or otherwise be made publicly available? Yes No
 - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous? Published Anonymous
 - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?
- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?
- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?
 - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?
- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?
 - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?
 - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?
 - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
 - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

No comment

2. Discussion questions – skills and qualifications of trainers and assessors:

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?
 - Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?
 - Is the *TAEASS502B Design and develop assessment tools* unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?
- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?

COMMENT:

No comment

3. Discussion questions – benefits and purpose of a VET professional association:

- Is there a need to establish a national professional association for Australia's VET system?
 - Specifically, is there a clear role for Australian governments in assisting the development of professional skills of the VET workforce by funding a professional association?
- What are the barriers to establishing a national professional association? How could these be overcome?
- What would be the most useful guiding purpose of a national professional association?

COMMENT:

No comment

4. Discussion questions – potential activities of a VET professional association:

- What activities would be most beneficial for a national professional association to undertake?
For example, would it:
 - coordinate, approve or design professional development programs
 - develop capability frameworks
 - positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
 - act as an advocate and voice for VET trainers and assessors
 - interact with industry to respond to their emerging needs
 - register VET practitioners?
- What advantages would there be to conducting these activities at a national level rather than through existing professional development undertaken through membership of existing groups, or that which is currently organised by RTOs?
- Are there any existing organisations that could fulfil this role?

COMMENT:

No Comment

5. Discussion questions – models for a VET professional association:

- Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A,B or C?
- What value would a VET professional association, or associations, add to the VET sector?
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

COMMENT:

No comment

6. Discussion questions – capability frameworks:

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?
 - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

COMMENT:

No coment

7. Discussion questions – increasing industry confidence:

- Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?
- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent?
 - What would be the benefits and drawbacks in requiring such tests? Under what circumstances would they be mandated, for example, for particular student cohorts? Should these be specified in training products?
 - Who should regulate the tests?
 - Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?
 - Is the concept of an externally administered test, such as a test required before receiving a qualification, inconsistent with the premise of a competency based VET system?
 - Should the results of tests be made public at the RTO level?

COMMENT:

AIPM Endorsed Course Program

Background

AIPM, as peak body for project management in Australia, has been concerned for some time about assessment in project management qualification by RTOs.

AIPM has been operating an Endorsed Course Program in its current form since 2013 following a major review and rebuild of the former endorsed course provider program that had operated for over 8 years.

AIPM seeks to endorse short courses, VET qualifications and higher education programs, with a focus on providing Industry assurance of the relevancy and currency of course content to the profession of project management. For the purposes of our comments in this response, we will focus on the Certificate IV in Project Management Practice and the Diploma of Project Management.

The objective of the Endorsement is two-fold. Firstly, AIPM wants to raise the bar for providers, ensuring that appropriate content is being delivered, and also that thorough, appropriate and industry relevant assessment is being undertaken by RTOs. The audit is not identical to that undertaken by the regulator (ASQA) however to minimise impact on RTOs, AIPM requests the same type of documentation that would be expected to be provided to the regulator at audit.

To date, AIPM has endorsed over 60 vocational qualifications delivered by over 35 RTOs around Australia, both public and private. Currently there are 206 RTOs with the Certificate IV in Project Management Practice on scope and 289 RTOs with the Diploma of Project Management on scope.

AIPM's Approach

The Endorsement process requires RTOs to submit documentation in hard copy or soft copy that includes:

- Learning and assessment strategy
- CVs of trainers/assessors
- Course learning materials for 50% of units
- Assessment materials for 50% of units
- Model answers for all assessments
- Mapping documents showing how the assessment items relate to the units in the BSB training package

Endorsement audits are undertaken on a fee for service basis, with course providers paying AIPM a fee for the initial audit and then an ongoing annual fee. Auditors are paid a small fee for conducting each audit. Auditors have qualifications in project management, training and assessment and most have qualifications in quality auditing. All have at least 10 years' experience in the VET sector in training and assessment, at least 10 years industry experience in project management and at least three years experience in quality system or auditing. AIPM currently engages five Endorsed Course Auditors, and two senior auditors.

The audit is undertaken by two auditors. Two auditors are required to agree that the course meets AIPM requirements before the course is endorsed. Each auditor independently reviews the provider's submission and where they both recommend endorsement, then the course is endorsed. Where one auditor recommends endorsement and the other does not, the submission is then passed to a third, senior auditor for a subsequent audit.

The audit checklist developed by AIPM focusses on ensuring that:

- The course director (or similar) holds current or recent industry certification or equivalent, and practical, industry experience in project management (approximately 10 years)
- The trainers and assessors hold current qualifications and/or industry certification in project management
- The materials teach to current standards, use recent and relevant industry references or texts, and the depth and breadth is appropriate
- The assessment:
 - Covers all requirements of the training package
 - Appropriate assessment methods are used to assess specific knowledge or performance aspects
 - Model answers are correct and appropriate
 - Is relevant to industry and reflective of what is required in practice in organisations

The rationale for the Course Endorsement approach is based on experience as VET auditors for previous State and Territory Government Training Authorities, the demands of employers to ensure that graduates are actually competent, observations from many years of practice in the VET sector, the need to provide a better standard for students, as well as experienced volunteers first-hand experience with ASQA auditors who demonstrated poor audit practice and often do not possess any knowledge, experience or skills in the subject matter being audited (ie project management).

As such, AIPM took the lead as the pre-eminent professional association in project management in Australia, to address these short-comings and the role as industry leader to raise the bar.

In essence, AIPM has led the development of an independent industry validation of assessment, through the Endorsed Course program.

AIPM believes that independent industry validation is necessary as in our experience many trainers/assessors do not have sufficient and current industry experience.

8. Discussion questions – the role of industry in assessment:

- What role should industry, for example, employers and industry organisations, play in validation of assessment? Does the varied interpretation of 'industry' inhibit a proper appreciation of the topic and should it be defined? If so, who would best define 'industry' when considering the practice of validating assessment?
- Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved?
- Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?
- How can we ensure engagement with industry is appropriately targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?

COMMENT:

See earlier comments on AIPM course endorsement.

Assessment Issues

Limited industry experience

Despite what is contained within current National VET Regulations and Standards, many RTO's have limited or no engagement with industry and do not have trainers with industry currency. Many RTOs engage full-time trainers and assessors which takes them out of industry and as a result, many have not worked in industry for many years. This results in trainers and assessors rapidly losing currency and relevance in an industry that is rapidly changing.

Part of the issue is that there is no clear definition of 'industry' and there is also no clear measure of what industry 'currency' is for trainers and assessors.

Anecdotal evidence observed by AIPM Endorsed Course auditors indicates that some RTOs demonstrate their trainer's/assessor's currency through being a member of an association and receiving their newsletter or magazine. On the surface this might seem appropriate, however, anyone can pay their membership fee and join almost any professional organisation as a member, yet have no actual involvement or experience in the industry and have no understanding of industry terminology.

AIPM is of the view that just being a member, or reading a magazine occasionally is not enough. It is for this reason we validate that the trainers either have 10 years of recent industry experience or hold an AIPM certification, which requires industry currency.

Shortcomings in current ASQA Audit Practice

Despite ASQA's efforts and the various iterations of new VET Regulations and Standards, there still remains a significant gap in the audit process, which results in ongoing poor outcomes for students and their current or potential employers.

The issues found doing the Course Endorsement audits highlight a serious systemic shortcoming in the ASQA audit process. Auditors engaged by ASQA do not systemically have knowledge, skills or experience in project management and therefore they are at best 'guessing' whether the training and assessment meets the requirements of the training package, and also do not really know what is 'current' as far as industry is concerned. There is no systemic use of industry experts in the audit process, nor do the auditors have the necessary industry skills, knowledge or experience. This can result in the ASQA auditor making an incorrect audit judgement and resulting in a 'non-compliant' finding against an RTO. Even worse is where the audit outcome is deemed 'compliant' yet there are severe shortcomings in the training and assessment.

RTO's who have been through the AIPM Endorsed Course Audit process have experienced both of these issues.

Of significant concern was that around 10% of RTOs claimed that they had recently been audited by the Regulator who deemed them to be compliant. Whilst no RTO's substantiated their claims by providing evidence of such audits, if these assertions are true, then it highlights significant shortcomings in audit practice, particularly where AIPM's experience was that 90% of RTOs demonstrated some issue with assessment, which would have been considered non-compliance had it been an audit by ASQA.

Feedback from one specific RTO indicated that the ASQA auditor, who held no project management qualifications, had no recent project management experience, and was not certified by industry or similar, claimed the RTO had assessment material that didn't meet the training package. The point of conjecture was that a specific technical term in the assessment didn't identically match the specific term in the training package.

The RTO lead, who had written the assessment materials had also personally written that unit of the training package and at the time chaired the industry reference group for the Industry Skills Council. He also had current industry certification, three qualifications in project management and had over 20 years' hands on (and current) industry experience in project management. The auditor was technically incorrect, yet was unwilling to see that this was the case, but instead took the view that they were the auditor and therefore their opinion, even though technically incorrect, was the only opinion that mattered. The RTO was subsequently found non-compliant at audit.

Training Package contents and qualification structure

Whilst it sits slightly out of scope of the Discussion Paper, any discussion about assessment must take into account the Training Package against which assessment is being undertaken. It must be kept in mind that the training package is the standard against which the assessment is designed.

AIPM's first-hand experience has been that there has been limited input from industry into training packages and often involves people who have not been active in industry for many years. Many are TAFE managers, union delegates or work in HR departments, and as such lack either recent hands-on experience or operate in peripheral roles that do not expose them to what is actually happening at

the coalface. This has often led to training packages being out of date and structured in a way that is not relevant or useful to industry.

AIPM was extremely disappointed with the structure of the Certificate in Project Management Practice and the Diploma of Project Management, which was changed to meet qualifications structures as detailed in the Training Package Standards at that time. This meant that the previous structure of 9 core units that had been aligned to the international de-facto standard – the Guide to the Project Management Body of Knowledge (*PMBok® Guide*) could no longer be used. Instead a number of seemingly irrelevant electives were added to the qualification, which in AIPM's view diluted the qualification and stripped away over 20 years of development that had occurred to that point. Prior to this change the project management qualifications and component units of competency were based on what industry expected and required a project manager to undertake. Following the change in structure, the Certificate IV and Diploma qualifications have become nothing more than a group of units and a curriculum document.

This has had the effect of relegating the Certificate IV and Diploma qualifications to an inferior position with the AIPM certification (which is still based on *PMBok® Guide* knowledge areas) being seen now as the industry mark of quality. Therefore, the issue this has created is that the product of the qualification does not result in what employers and the AIPM expect competent project managers to be able to do.

9. Discussion questions – specific models:

- How can independent validation be best applied to avoid a 'one size fits all' approach? For example should independent validation of assessment be triggered by:
 - improving RTO practice, for example, through a principles based model and best practice guide to support the VET workforce in identifying the most appropriate technique to validate assessment
 - mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk
 - funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding.
- Should there be an increased role for external assessment by industry, and in which situations? For example, should it be mandatory for certain industries where there is a concern for public safety if a learner is incorrectly deemed competent?
- If independent validation of assessment is to be risk-based, then what factors should be considered in the assessment of risk, for example, public safety, RTO profile, student cohort?
- Should high-risk student cohorts be required to undergo independent reassessment of industry-agreed sets of competencies before being issued with their qualifications?
 - For example, particular qualifications; students undertaking qualifications with RTOs with high levels of non-compliance; or that conduct assessment wholly online or on-the-job; or in areas of public safety.
- Would the burden be too great if independent reassessments were required for an entire student cohort, and should independent reassessment apply to a sample of students instead? If so, how could such a sample be chosen?
- Who would be most appropriate to oversee the reassessment of qualifications?
 - For example, could existing regulators or other organisations (such as firms that specialise in assessing students) take on this role?

COMMENT:

AIPM has been actively involved in the development of competency standards in project management with the first competency-based qualification in Australia being developed by AIPM in 1992. AIPM has actively contributed to the Business Services Training Package since that time, and until 2009 had been engaged directly by Innovation and business Skills Australia (ABSA) to develop, maintain and update the Certificate IV, Diploma and Advanced Diploma of Project Management.

AIPM was one of the key contributors to the development of the Certificate IV in Project Management Practice and Diploma of Project Management in 2012, as well as through the development of the Advanced Diploma of Program Management and Graduate Diploma of Portfolio Management in 2014.

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Findings from our Audits

In conducting these 60 or so course audits to date, the findings are that the majority of RTO's don't conduct industry-appropriate assessment.

Approximately 10% of RTOs were given unanimous endorsement following the first review, with few issues being identified. Around 60% had some rework to do, and the remaining 30% had to completely overhaul their assessment process and resubmit all of it.

Around 10% decided it was too much work to do and subsequently withdrew their Endorsement application. The 'good' submissions and 'poor' submissions were spread across all types of organisations: both public and private RTOs as well as both small and large providers.

Common problems found during this process were:

- A lack of understanding that all aspects of a unit of competence need to be assessed
- Only skills/performance was being assessed with knowledge not being assessed at all
- Old reference material referenced standards and texts that were over 10 years and up to 3 versions old

- There were no model answers documented, therefore assessors basically 'guessed' if the answers were correct, resulting in inconsistency in assessment
- The assessment material wasn't mapped back to the training package, therefore there was no way to determine if all aspects of the training package had been assessed – anecdotal feedback from RTOs indicated that the volume of assessment was in some cases doubled once the mapping was undertaken. This suggests that only a part of the training package had been fully assessed.
- Inappropriate assessment methods were being used – for example skills/performance was being assessed through multiple choice questions or specific theoretical knowledge specified in the training package was being assessed through some form of production of a document.
- Volume of learning was frequently inadequate, with some providers offering diplomas with only two or three days of contact time (or equivalent if online).
- Training and assessment being conducted by non-RTO's, purportedly under some kind of licensing arrangement, and where the only indication of the RTO's presence is a logo on the student's certificate.

10. Discussion questions – industry expectations and graduate capabilities:

- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?
 - Do higher order issues need to be resolved regarding terminology such as ‘competent’ (as assessed against the training product) and ‘job ready’ (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?

COMMENT:

Employer expectations

The discussion paper raises the issue of employer expectations of graduates and correctly identifies that often employers want either job ready, proficient and experienced graduates rather than those that have been assessed as ‘competent’. AIPM shares these observations and also identifies that there is a large difference between a graduate who has been assessed as ‘competent’ against the training package and one who is job-ready, proficient and experienced.

Experience required to achieve competence

AIPM’s observation is that there is still an unacceptably high failure rates for projects, and whilst this is not all due to a lack of project management skills or knowledge, the competence AND experience of project managers are a contributor to these failures.

AIPM’s experience through our competency-based certification program (the RegPM¹) is that projects vary between industries and also vary substantially in size and complexity. Project managers typically start working life in other roles and then find themselves almost ‘by accident’ in a project management role. Often project managers are tasked with managing larger, higher risk and more complex projects over a number of years and quite often do not reach a level of competence across all project management knowledge areas until they have been doing so for 5-8 years on average.

AIPM’s experience is that projects need to reach a minimum complexity threshold below which the project manager is not able to exercise the full range of skills nor apply the depth of knowledge required to be deemed competent. However, complexity is difficult to measure and also difficult to describe in a clear and succinct manner.

Herein lies the challenge: If you have to wait for 5-8 years to produce a competent project manager, then none would exist. Delivering training and assessment over a 5-8 year period is also not practical or feasible for any party concerned.

To ameliorate such issues, the types of projects used in training or as the basis of assessment are often far less complex and are usually simple and straight forward in nature. This is the level of achievement attained after delivery of the notional volume of learning specified in the Diploma.

¹ AIPM’s RegPM certification is an RPL-style assessment which operates at five different levels, with a specific standard being defined for each level in project management.

This creates an expectation gap for employers, who want good, experienced project managers who can handle complex projects, difficult clients and more complicated situations yet the training 'system' produces novice project managers who still need 4-7 years of hands on experience to become 'proficient' in the eyes of industry.

By way of an analogy, employers want grand prix winning drivers, yet the training system, produces drivers who have their P-plates and have demonstrated a basic level of achievement through their driving test.

Employer expectations of training and assessment

AIPM has also had anecdotal feedback from members and providers of Endorsed Courses that employers are wanting to minimise the volume of training and have a Diploma of Project Management delivered in less than 5 days of training.

In addition, some employers and non-project management associations want assessment to be done in the classroom and not undertaken in the workplace.

These situations currently occur in government agencies in NSW, QLD and in federal government and in many private sector organisations, and appear to be driven by the desire to minimise cost and minimise the time employees are absent from the workplace.

Both of these are unsatisfactory as the volume of training isn't sufficient and doesn't allow sufficient time for the learner to assimilate the knowledge. Assessment must also be done in a workplace context, so that the students can learn to apply the knowledge and skills in a workplace setting and in doing so deal with the challenges of managing projects in the 'real world' which is substantially more difficult than in a germane classroom setting.

Some work has been done to more clearly specify the assessment requirements in Training Packages, however this process is still undertaken and is being promoted by training providers, government agencies and specific professional bodies.

Industry Engagement in Assessment

Through the Endorsed Course program, AIPM provides a model for industry involvement in assessment validation. Through our experience, we have found and rectified poor assessment practice by a large number of RTOs all of whom have been appreciative of the process, despite the rework required, which in some instances was very substantial.

Whilst AIPM may be fortunate to have a small group of members with the unique mix of skills and experience required to make a program like this happen, we urge other industry and professional bodies to implement a similar approach.

11. Discussion questions – evidence of assessment and graduate competency:

- Should the Standards for RTOs be revised to include strengthened and more specific rules around the conduct of and evidence to support assessment? Which elements that have a clear link to quality of student outcomes need to be strengthened?
- Would a more prescriptive condition of registration, such as a requirement for RTOs to retain all assessment samples for a longer period, improve the quality of assessment?
- How could the focus of regulation move to evaluating assessment outputs, such as samples of students' assessment pieces, without incurring excessive costs or imposing excessive burden on RTOs?
 - Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?
- Are there other mechanisms that you would like to see added to the regulatory framework to prevent poor assessment? For example, should training-only RTOs be recognised as a formal part of the regulatory framework?

COMMENT:

AIPM puts forward a number of recommendations in response to the discussion paper:

1. AIPM recommends that professional bodies or other identified industry groups develop and implement endorsement programs to ensure that industry relevance and industry technical knowledge is applied ensuring RTO's are meeting the technical requirements of the qualifications they deliver. AIPM would be prepared to share this model with other professional bodies.
2. AIPM recommends that ASQA require RTOs to hold industry endorsement for qualifications (where it exists) as part of their compliance requirements. This provides a clear and simple way for industry and RTO to engage and provides a rigorous independent industry review of assessment materials used by RTOs.
3. AIPM recommends that ASQA (or the AISC) develop (or engage with each industry to develop) clear definitions of industry and what is considered industry currency. The current approach is highly variable and inconsistent in relation to project management, and is therefore is completely unacceptable.
4. the AIPM Endorsed Course model be used as an exemplar for other professional bodies – AIPM would welcome the opportunity to share this model with other bodies.

12. Discussion questions – enforcement:

- How could the focus of regulation move to evaluating assessment outputs?
- Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? For example, should the regulator have an explicit administrative power to require a RTO to arrange and fund external reassessment, or should additional civil penalty provisions be created?
- To what extent should the characteristics of the RTO influence the response? Should the size of the RTO or the number of students involved matter?
- Given the need to balance procedural fairness with swift and effective enforcement action, what methods should be available to the regulator to manage RTOs that are repeatedly non-compliant with assessment requirements? How could such repeat offenders be defined?
- What role should regulators have in communicating their activities and findings? Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken?

COMMENT:

No comment

13. Discussion questions – cancellation and reassessment:

- Where inadequate assessment has occurred, should the power to cancel qualifications be exercised more frequently than it has in the past? What factors should affect this decision (for example, potential impact on public safety) and how should they be balanced?
- Should a scheme for the reassessment of students be implemented? If so:
 - Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?
 - Should there be a time period after which ASQA should not move to cancel an individual's qualification? Noting potential public and other safety issues, should a decision to cancel consider whether or not the person involved is reliant on the qualification for their current employment?
 - Who should bear the cost of reassessment and any gap training found to be necessary? If the cost is to be recovered from the RTO, should this be pursued regardless of the RTOs financial viability?
 - Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?
 - What should the qualifications be for those doing the reassessment, and what industry experience and currency would they need? To what extent should ASQA, industry or employers be directly involved in the reassessment process?
- Should a tuition assurance fund be set up to further protect students in Australia's VET sector, particularly in the context of any scheme of reassessment or cancellation of qualifications? Should membership be mandatory for all RTOs? Who should operate such a fund, and who should bear the cost of its operation?
- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

COMMENT:

No comment