

Submission to Consultation by the Australian Government Department of Education and Training on the Quality of Assessment in Vocational Education and Training Discussion Paper

March 2016

Lee Thomas
Federal Secretary

Annie Butler
Assistant Federal Secretary

Australian Nursing & Midwifery Federation
PO Box 4239 Kingston ACT 2604
T: 02 6232 6533
F: 02 6232 6610
E: anmfcanberra@anmf.org.au
W: www.anmf.org.au

Introduction

The Australian Nursing & Midwifery Federation (ANMF) welcomes the opportunity to provide advice to the Australian Government Department of Education and Training in response to their Discussion Paper – Quality of Assessment in Vocational Education and Training.

About the Australian Nursing and Midwifery Federation

Established in 1924, the ANMF is the largest professional and industrial organisation in Australia for nurses and midwives and assistants in nursing (however titled), with a combined membership of over 250,000 across the eight state and territory Branches. Our members are employed in urban, regional, rural and remote locations in both the public and private health and aged care sectors.

The ANMF participates in the development of policy relating to: nursing and midwifery practice, professionalism, regulation, education, training, workforce, and socio-economic welfare; health and aged care, community services, veterans' affairs, workplace health and safety, industrial relations, social justice, human rights, immigration, foreign affairs and law reform. The ANMF has also taken a positive role and active leadership in many of the national, state and territory and local activities relating to aged care.

The ANMF is represented on many relevant boards, committees and industry including the previous Community Services and Health Industry Skills Council (CS&HISC) and state Community Services and Health Industry Training Boards. The ANMF will continue to represent and participate in the newly formed Industry Reference Committees (IRCs) in collaboration with the Australian Industry and Skills Committee (AISC) and the relevant Skills Service Organisation (SSO), Skills IQ; in relation to development and review of nationally accredited training Units of Competence (UoCs) and qualifications relevant to areas of nursing and midwifery work.

The ANMF is involved with pathways to higher education through its representation on the Australian Qualifications Framework Council's Pathways Policy Reference Group. The ANMF has two Branches that are Registered Training Organisations (RTOs) delivering VET courses and qualifications in nursing and VET courses and qualifications that have elements of nursing work embedded within them.

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

It is the opinion of the ANMF that vocational education and training (VET) providers delivering TAE qualifications must comply with the *Standards for Registered Training Organisations 2015*. The Standards describe the outcomes education providers must achieve in order to maintain their registration therefore, those who are compliant in the delivery of TAE qualifications should be permitted to continue offering these qualifications and skill sets. The number of education providers who are not compliant should have the qualifications and skill sets removed from their scope. It is the role of the regulator, the Australian Skills and Quality Authority (ASQA) to ascertain compliance and to decide on the action to be taken.

Recognised prior learning (RPL) is one of a number of processes for establishing credit transfer towards a qualification or a unit of competence (UoC) within a qualification. RPL broadens access into formal learning by enabling credit to be given to a learner through other formal, informal or non-formal learning. When applied correctly, with consistency,

fairness and transparency it reduces the amount of formal learning required to achieve the qualification. The ANMF suggests that organisations providing RPL have an established, systematic approach to RPL including policies and procedures that govern its implementation and that they be an approved provider on an 'RPL Approved Provider List' preferably with ASQA.

All training and assessment should be undertaken by educators with expertise in the subject, content or skills area in which they are training and assessing. *Standard One Clause 1.13* of the Standards for RTOs cites 'the RTOs training and assessment is delivered only by persons who have:

- a) Vocational competencies at least to the level being delivered and assessed;
- b) Current industry skills directly relevant to the training and assessment being provided;
- c) Current knowledge and skills in the in vocational training and learning that informs their training and assessment'.

Standard One, further cites that from 1 January 2017, people delivering the Certificate IV in TAE or any assessor skill set from the TAE Training Package must hold one or more of:

- d) Diploma of VET
- e) Diploma of TAE
- f) A qualification in adult education higher than a diploma or
- g) Work under the supervision of a person that holds one of the above qualifications.

The ANMF supports a practical component to be a requirement of achieving competence in the TAE qualifications. Best practice would have the student/trainer/assessor already working in the VET sector prior to commencing a TAE qualification, thereby enabling the practical requirement to be achieved through their existing work schedule.

The Australian Qualifications Framework Volume of Learning Indicators state:

Certificate IV qualifications are often either;

- Shorter duration specialist qualifications that build on existing skills and knowledge
- Longer duration qualifications that are designed as entry level requirements for specific work roles.

Therefore the timeframe for the practical component should take into consideration whether the student/trainer/assessor is new to the industry or an experienced worker who already possesses industry skills and knowledge.

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

The ANMF would like to see the *TAEASS502B Design and develop assessment tools* included in the core of the TAE Certificate IV. Within the VET Quality Framework, assessment tools or evidence-gathering tools, are vital to effective, valid and safe assessment practice. Trainers and assessors need an understanding of the tools they use and must be able to adapt them to meet the needs of their learners and the environment. Assessment tools contain both the instrument and instructions for gathering and interpreting evidence therefore they are a necessary component of the training VET assessors and trainers must undertake in order to be competent in the area of assessment.

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

National professional associations for VET already exist in Australia. Such existing organisations are well established and are known as the:

- AUSTAFE,
- VETnetwork Australia,
- Australian College of Educators,
- TAFE Directors Australia (TDA),
- Australian Council for Private Education and Training (ACPET),
- Australian Vocational Education and Training Association (AVETRA) and
- The Australian Education Union (AEU).

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

There are existing national organisations who could and do fulfil a number of the roles outlined above. The ANMF would support the AEU particularly as they offer both industrial and professional services.

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

The ANMF would support Model A, only if it included existing peak bodies, as detailed at question 3.

Existing peak bodies bring with them existing members, professional support and advocacy.

The Australian Education Union offers both professional and industrial support to its members and has Branches in each State and Territory of Australia.

It is the opinion of the ANMF that mandatory membership of a professional association ought to remain voluntary and at the discretion of the VET educator/trainer. Forcing mandated membership upon individuals may be viewed as completely unethical.

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

The ANMF supports the existing VET Practitioner Capability Framework established by Innovation and Business Skills Australia (IBSA). It offers a strong foundation for enhancing the quality of assessment in VET and should be incorporated into the Standards for all VET education providers.

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

The ANMF played an integral role in the recent review and streamlining of both the Health and Community Services Training Packages in conjunction with the former Community Services and Health Industry Skills Council.

Where qualifications and/or individual UoCs were related to direct care roles, industry insisted upon assigning prescriptive assessment requirements to ensure the student was given every opportunity to acquire the necessary skills and knowledge to be competent in the delivery of best practice care to clients.

The ANMF supports industry involvement in developing industry-endorsed, externally administered tests to ensure competence of VET students particularly where their work role requires them to work directly with members of the public. The VET system is competency based and any measure where competence being achieved is supported, should be implemented.

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

Currently there are disincentives for qualified health professionals, such as nurses, to work as educators and or assessors for most VET providers, although it is through the transference of clinical skills and knowledge imparted by health professionals, combined with workplace experiences that leads to better student learning outcomes. For qualified professionals to engage in assessment of students, there must be accompanying incentives such as remuneration for their time and adequate staffing and skill mix to ensure they are not burdened by a workload at the time of conducting the assessment.

The ANMF does believe there is a need to build industry capacity and capability in regards to training and assessment, particularly in the VET sector. Government support of industry professionals to undertake the necessary training themselves in order to validate training and/or assessment would encourage industry engagement and lead to better outcomes for students, their respective employers and ultimately, the public.

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

Where a qualification is identified as high risk, such as where the safety and care of consumers is concerned, or the qualification leads to a registration outcome with a regulatory authority, the ANMF considers mandated requirements to ensure the highest quality of assessment and validation are vital. Furthermore, the ANMF supports industry-agreed sets of competencies and assessment for qualifications where public safety is concerned and where the education providers are at a high risk of non-compliance, or potential non-compliance.

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

In relation to qualifications found within the Health and Community Services Training Packages, industry assisted in the development of training and assessment Companion Volumes to better inform education providers of what these sectors perceive as graduate competence. The Companion Volumes also guide education providers in the design of relevant training products, resources and assessments to ensure graduates are work-ready.

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

Standard Two of the Standards for RTOs relates to quality assurance and requires education providers to conduct regular reviews of their training and assessment strategies. It is suggested that education providers conduct this review in conjunction with industry engagement activities. The ANMF suggests this standard be strengthened by mandating the requirement of education providers to validate student assessments, including evaluation of assessment outputs, as part of their engagement with industry activities.

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

It is the view of the ANMF that the regulation of assessment outputs is the role of the regulator – ASQA. As stated in the ANMFs response to Question 11, the strengthening of *Standard Two of the Standards for RTO's* allows for ASQA to monitor and measure the education providers' engagement with industry in regularly reviewing their assessment strategies and outcomes.

Work should be undertaken with ASQA to forge links and develop partnerships with industry and relevant stakeholders in order to assist them in the evaluation of assessment requirements and competence in high risk qualifications such as those where direct client care is a feature of the work role. They may also play a role in review of assessment materials to ensure a standard national assessment criteria, rather than ad-hoc measures by each education provider.

Where education providers are found to be inadequate in assessment outcomes, the regulator must be able to impose swift and effective enforcement action and notify the public of the action undertaken.

Employers of direct care workers must be empowered to, and be informed of, how to make a report or notification about an education provider who is deeming students competent, when students clearly demonstrate that they do not meet industry standards of competence within the work role.

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

It is the opinion of the ANMF that ideally, where inadequate assessment has occurred, qualifications should be suspended and the education provider in question be required to self-fund reassessment and or delivery of skill gap training by either another education provider or an external assessor. Reassessment must be undertaken by an experienced assessor with relevant and current industry knowledge and skills.

Where a student has committed fraud in order to achieve a qualification, it is the belief of the ANMF, that the qualification outcome should be cancelled; and should the student be reliant on the qualification for employment, they be required to finance RPL to assess skill gaps and the necessary training required to achieve competence before being reissued with the previously cancelled qualification.

Where a graduate is significantly impacted by a recalled qualification due to an education providers incompetence, a mechanism is required to assist the graduate in every way to

achieve competence by another means i.e. undertake further training with another education provider with proven competence in the delivery of said qualification.

It is the view of the ANMF, that there must be a career structure for VET educators/assessors commensurate with educational qualifications and experience, in order to attract, recruit and to retain high quality educators to the sector. Federal and state government funding is needed to support the continuous professional development of VET educators.

A range of delivery modes and funding models could be explored through surveying training need requirements of VET educators. Educators at the top of the career structure would be engaged to deliver reassessment of students where necessary.

Conclusion

The ANMF agrees there is room for improvement in assessment outcomes for competency-based training. However, it is important to note that in relation to the recent review and streamlining of the Community Services and Health Training Packages, industry played an important role in establishing prescriptive assessment parameters within the reviewed qualifications and individual units of competence to address concerns raised by employers regarding incompetent graduates of VET training. With mandated work placement hours and strict assessment requirements it is our hope this approach will lead to better assessment outcomes and ultimately, work ready employees. The ANMF, as a peak body and industry representative, looks forward to working with government to ensure quality assessment outcomes in VET, and a skilled Australian workforce to support a productive economy.

References

- User's Guide: Standards for Registered Training Organisations (RTOs) 2015; Australian Government Australian Skills Authority.
- Victorian Industry Advisory Council (VIAC) Industry Engagement Paper January 2016
- Training.gov.au – TAE40110 – Certificate IV in Training and Assessment (Release 4)