

Wednesday, 9th March 2016

Quality of assessment in vocational education and training

EXECUTIVE SUMMARY

This submission is made on behalf of the 139 NSW Catholic secondary schools which in 2015 enrolled 39,286 students in Stage 6 HSC courses. Of these students approximately 31% were enrolled in one or more Vocational Education and Training (VET) courses. In the same year, 577 students enrolled in NSW Catholic schools were undertaking a school-based Apprenticeship or Traineeship.

The NSW Catholic school sector operates nine Registered Training Organisations and also utilises both external public and private RTOs for some training. The majority of training takes place by dual accredited teachers within schools that both a teaching qualification and the TAE qualification. These qualifications are delivered in conjunction with the Higher School Certificate and Record of School Achievement.

Informed by this extensive engagement with school-based VET, the Catholic Education Commission NSW (CECNSW) identifies in this submission a range of school-based VET issues. These issues should be addressed in the interests of further advancing VET participation and outcomes for stage 5 and 6 students attending NSW schools.

This submission will address the following areas of the Department of Education and Training Discussion Paper;

1. Foundation reforms
2. Reforms to the assessment of VET students
3. Reforms to the regulatory framework

SUBMISSION DETAILS

1. Submission made on behalf of: Individual Organisation

2. Full name:

3. Organisation (if applicable):

Catholic Education Commission NSW

4. Please indicate your interest in this discussion paper:

Submission on behalf of 139
Catholic secondary schools in NSW.
Advice has also been sought from
the nine Catholic school sector
RTOs

(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. FOUNDATION REFORMS

Ensuring VET Practitioners requirements provide the strongest platform for high-quality assessment.

The Catholic Education Commission NSW (CECNSW) supports the position that trainers and assessors must have the appropriate levels professional skills, knowledge and capabilities.

Recent changes to the Standards for RTOs 2015 have strengthened the requirements for RTOs wishing to provide training and assessment

Trainers and assessors (Standard 1.14 –1.15)

From 1 January 2016, there is a requirement for persons delivering training and/or conducting assessment to have either TAE40110 Certificate IV in Training and Assessment (or its successor) or a diploma or higher level qualification in adult education.

The current Standards for RTOs accompanied with the rigorous ASQA audit processes should be sufficient to ensure appropriate training and assessment.

Reducing the numbers of RTOs eligible to deliver TAE qualifications or skills sets may impede training in regional and remote areas of NSW.

RTOs should be able to utilise a recognition of prior learning (RPL) process. The RPL process must be conducted with sufficient rigor to ensure the integrity of the issued qualification.

The CECNSW ensures that all trainers and assessors hold a TAE qualification issued by either an external public or private RTO. This position is to reduce any negative perceptions from the broader community. The CECNSW doesn't support RTOs issuing TAE qualifications to trainers within their own RTOs. If this was permitted the evidence to support the issuance of qualifications should be rigorously examined at the time of audit. The CECNSW will not change the current practice with the Catholic schooling sector in NSW of using external RTOs.

Any practical component will reinforce the learning that is provided to trainers participating in TAE qualifications or skills sets. The length of time shouldn't be mandated as this may impede access to the qualification.

As the trainers within the NSW Catholic RTOs hold both a teaching qualification as well as the TAE qualification there is currently sufficient balance between assessment and learning units of competencies in the core units. An additional core unit such as TAEASS502B Design and develop assessment tools may place undue emphasis on assessment which may detract from the learning component of the trainer and assessor. In some circumstances an individual may not be a trainer but only an assessor. It is then appropriate for this individual to undertake this UOC as an elective.

All stakeholders should be consulted regarding any change to the TAE. To rely only on consulting key stakeholders may not provide a true reflection of the issues and thoughts of the majority.

Ensuring those teaching VET skills are highly competent professionals with contemporary assessment skills.

Professional associations roles and functions vary but their primary focus is in providing professional support, professional learning, networking with peers, advocacy and advice. These roles are currently being met by a number of organisations at the national level and include organisations such as VELG and VETNetwork Australia.

There is a role for the Australian government to assist in the development of a national association but the viability of such an association must ultimately rest with the association to ensure that it is self-directed and funded.

Barriers to a national professional association include;

- A national professional association will need to compete against existing, well-established organisations.
- The cost of membership
- Value for money
- Accessing professional development in regional and remote locations
- Mandating compulsory membership may be seen as a hindrance.

The range of activities provided in Discussion Point 4 are seen as activities that would be expected in a VET professional association though the registration of VET practitioners was questioned by some stakeholders.

A key aspect of any association is the involvement of industry and the interaction between industry and the education sector. Professional support for new VET trainers and assessors was seen as a key function of an association. This support may be in the form of targeted professional development or a mentoring process.

There is a range of State and National organisations that currently provide a range of activities so there is an opportunity to develop a new association that is not encumbered by exist arrangements and perceptions.

Model B was the preferred model considered by stakeholders if registration of VET trainers were not included. This model allowed and catered for both individuals and RTOs and provided a range of services that would support VET delivery.

Stakeholders supported the concept of Model C if registration was mandated for VET trainers and assessors. Concerns were raised if duplicate registration were required for both teachers and trainer/assessor accreditation. Feedback provided strongly indicated that there was potential for conflict between National and State based associations/accreditations. Trainer and assessor accreditation standards should be mapped against the existing Australian Institute for Teaching School Leadership (AITSL) Standards to allow accreditation with one body rather than duplication of existing processes. Members paying dual membership fees is not conducive.

The VET Practitioner Capability Tool developed by the Innovation and Business Skills Australia Industry Skills Council was developed for a specific industry. There is merit to further develop this capability framework but requires additional work to broaden its range and purpose.

2. REFORMS TO THE ASSESSMENT OF VET STUDENTS

Increasing industry confidence in the assessment processes within RTOs is vital but this can't jeopardise the quality of the training and the pedagogy associated with this training. Mechanisms are currently in place that strengthen the confidence of industry through the development of training packages in consultation with industry and validation of assessments. The development of training packages should be the primary mechanism for industry to be consulted in setting the performance criteria; required skills and knowledge as well as the critical aspects of assessment, which includes evidence, resources and assessment methods.

There is often a disconnect between those that are consulted in the development of training packages and those in industry who utilise the training products. Identifying the most appropriate people to develop training packages and for validation of assessments is difficult. Stakeholders often ask "Who is industry?" when trying to ensure that training and assessment meets the needs of the industry.

There is a risk that the lack of appropriate industry representation that have an understanding of training and assessment cause lack of understanding between RTOs and industry. This may place increased burdens on individuals working in industry and additional work for RTOs and trainers incorporating validation feedback on assessment techniques.

External audits coupled with internal audit processes with RTOs should build confidence in the VET system.

Externally delivered tests are costly and difficult to design and are against the principles of competency based assessment.

External validation of assessments should be targeted and focus on high risk units of competencies. This should consider WHS issues and the implications for students being deemed competent. Low risk units of competencies should have less external validation requirements.

Terminology is a complex issue in VET. The language used should be consistent across all RTOs and jurisdictions. Terminology is also influenced by industry groups and may differ from one industry to the other.

3. REFORMS TO THE ASSESSMENT OF VET STUDENTS

Any decision to revise the Standards for RTOs 2015 must be evaluated to ensure that any change doesn't increase the regulatory burden for RTOs. Recent VET reforms have been focused on reducing this regulatory burden and this position should be maintained.

Extending the retention of evidence may place financial and administrative burdens on RTOs. This is particularly the case where RTOs have high student enrolments and/or have many delivery sites. The decision to retain evidence for a longer period of time should be more targeted and focus on high risk units of competencies and qualifications.

There may be little benefit of retaining assessment evidence for a longer period of time under the current ASQA auditing timeframes. It may be more beneficial to use the increased retention of evidence as a sanction for RTOs that have failed to demonstrate compliance in the area of assessment.

RTOs should provide both training and assessment. The encouragement of RTOs to focus on holistic training and assessment strategies may make "training only" RTOs difficult. The utilising of both a Training RTO and an Assessing RTO may place additional financial burden on students and RTOs. This may have significant impact in regional and remote areas. The RTO that provides the training is best placed to assess the students.

Students shouldn't be disadvantaged financially for the operations of RTOs that have failed to provide adequate assessment. A decision to cancel a qualification should utilise a risk analysis of the qualification or unit of competency. Any decision to rescind a qualification may in fact lower perceptions on the quality of VET delivery.

If the student has fraudulently obtained a qualification or statement of attainment, then these should be withdrawn.

A proportion of the funds provided as part of the registration and re-registration should be retained to support students who have been deemed to have received poor training and assessment. The funding of such a scheme shouldn't be levied against student enrolment fees.