Australian Government
Department of Education and Training

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: Jacqueline Asser

3. Organisation (if applicable):   Catholic Education South Australia

4. Please indicate your interest in this discussion paper: Education sector representative

   (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.

- 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:

Catholic Education South Australia (CESA) is pleased to present a response to the Quality of assessment in vocational education and training – Discussion Paper.

CESA represents the Catholic sector with state-wide responsibilities for Catholic schools in South Australia. CESA does not own or operate any schools but has delegated roles in relation to liaising with State and Federal Governments, negotiating and distributing government funds to Catholic schools and facilitating collaboration, consultation and planning among Catholic schooling authorities.

There are 33 Catholic secondary schools in South Australia. There is one Registered Training Organisations (RTOs). In 2015, 2057 students participated in one or more VET courses. There were 459 students in 2015 who had enrolled in a School-based Apprenticeship or Traineeship during their schooling.

- CESA does not think it is appropriate for large numbers of RTOs to deliver the TAE qualification. Approval to deliver should be obtained through a rigorous process encompassing all areas of delivery, assessment and staffing. The number of RTOs could be reduced as a result of an audit of high quality provision.

- Although rigorous audit and compliance systems may be in place, it lessens the credibility of the RTO.
- RPL is appropriate for this qualification when RPL process is conducted with sufficient rigour.
- It is appropriate for TAE to be delivered by experienced practitioners in training and assessment
- Trainers should hold a qualification higher than the Cert IV level they are delivering
- A practical component for Cert IV and Diploma levels would assist the student in gaining skills and confidence. It would also assist the trainer in identifying competence. This could be in a real or simulated environment for assessment purposes
- Entrants to the TAE Diploma could be required to have some prior experience in the industry, not necessarily as employment history.

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:
- CESA believes that Design and Development of Assessment Tools is important to the quality of the delivery. However it is not necessary for it to be a core unit of the Cert IV. Design of assessment tools is not always undertaken by those with cert IV level qualifications. An understanding of design could be helpful if assessment tasks need to be adjusted so could be appropriate in some cases. It should sit as a core unit in the Diploma.
- The key stakeholders/relevant sector could be involved in the updates in order for relevant and appropriate changes to be made.

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:
- A professional association with varying levels of membership (associate, professional etc) would be useful in providing professional support, professional learning and self /peer evaluation opportunities. A mentor program could be included to support those new into the industry or those wishing to improve.
- Barriers could include funding, at least initially until membership fees could provide a level of sustainability. Another barrier could be if it were made compulsory to capture all relevant personnel and ensure membership provided value for money.
- The most useful guiding purpose includes professional learning, mentor program, self/ peer evaluation, keeping currency of knowledge and qualification.

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:
- Coordination of PD programs and positive promotion of the profession would be very beneficial. Interaction and involvement of industry/education sectors would also be valuable.
- National level coordination would assist in providing a consistent service in each state.
- A new organisation may have less existing bias and could start with a fresh slate.

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

- Which of the suggested models for a VET professional association would be considered most preferrable 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:
- Model B looks to be the simplest most effective model
- The value would be centralisation of professional learning and consistency of services
- Sustainability could come from a blend of membership fees and government funding.
- Mandatory membership would be beneficial in capturing a broad membership base and the establishment of consistent standards.

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 VET Practitioner Capability Tool was developed for a specific purpose. CESA supports the development and implementation of acapability framework for VET Trainers and Assessors across all VET Industry Areas.

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:

- It is important for industry to have confidence in the assessment without being burdened with extra tasks involved in the assessment process. For example, they could be involved at a higher level in order to set standards relating to industry expectations, quality of assessment and levels of experience required etc. Confidence will follow with the final product and in the process of audit and compliance.
- Externally administered tests may be costly to implement, although may provide interesting data re gap analysis, standard of student completion etc. As a result of being implemented RTOs may train towards successful completion of these tests rather than inclusion of practical assessments.

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:
- CESA values the involvemtn of industry in assessment and feel it is important for industry to have confidence in the assessment without being burdened with extra tasks involved in the assessment process. For example, they could be involved at a higher level in order to set standards relating to industry expectations, quality of assessment and levels of experience required etc. Confidence will follow with the final product and in the process of audit and compliance.
- Externally administered tests may be costly to implement, although may provide interesting data re gap analysis, standard of student completion etc. As a result of being implemented RTOs may train towards successful completion of these tests rather than inclusion of practical assessments.

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:
Nil comment

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:

There is a role for both Government and Industry to work in partnership to ensure a common understanding of national VET system outcomes. There is a need for further clarification in training packages to explain 'competent' at an AQF level (pathway or prevocational qualifications e.g. Certificate I in Engineering). Students may be deemed competent but may not be job ready at AQF level I or II.

A checklist developed by industry could assist in communication about 'competent' and 'job 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:
- Conduct of developing and delivery of training and evidence of assessment should be clearly articulated in the standards for RTOs.
- Retention of assessment samples would improve the quality of assessment if used for moderation and clarifying purposes. The purpose of holding samples for longer would need to be clear.
- ASQA would need to oversee the function of evaluating student outputs even if the actual activity were undertaken by am external party. This party would have to report to ASQA and be answerable to them.
- Training only RTOs? CESA maintains that the RTO who has trained the student is in the best position to undertake the assessment.

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:
Nil 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:
- If inadequate assessment has occurred, it may be appropriate for the qualification to be cancelled and the student given the opportunity to be reassessed. This would raise the credibility and validity of the qualifications framework
- Yes, in the case above the student should be given the opportunity to be reassessed and perhaps undergo further training if required. The student should not bear the extra cost for this. The original RTO should pay for this.
- Student fraud should be taken seriously and the qualification withdrawn. If required, it would need to be undertaken again at the student's cost.
- An external fund may operate to fund the reassessment process. Payment into this fund should not be mandatory and could be operated through ASQA.