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:

Julia Anderson

3. Organisation (if applicable):

Catholic Education Office Darwin NT

4. Please indicate your interest in this discussion paper:

Education Provider, VET in Schools

   (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- it is more about quality of the delivery than numbers. It is about the quality of the trainer and assessor and the amount of time that TAE training is delivered. Auspicing arrangements may need to be tightened to ensure a high quality.
- Yes, this is a conflict of interest and raise's ethical issues. If it is not delivered with quality then this raise's issues all the way down to delivering training.
- Yes and no. If you are given a unit of competency then asked to provide evidence against it, you are assessing yourself when you have not been taught how to read or understand a unit of competency. However many professions have skills in delivery and assessment although not against a unit of competency
- The delivery of the TAE is about the quality of the TAE trainers' knowledge and experience and the quality of the delivery and assessment. The trainers must have skills and experience in the VET industry and demonstrate experience across the units ie; develop assessment materials, be involved in validation, delivered training.
The TAE must been seen as a professional qualification with not necessarily having to hold a higher qualification but delivered by quality trainers with skills and knowledge.

Practical component of this could be around ongoing reflective practice and professional development. Perhaps having a mentor or be under supervision for the first year before being signed off as competent.

Participants in the TAE Diploma need to have prior knowledge of the VET industry. Without prior knowledge, the Diploma would be irrelevant. Cert IV TAE should be a prerequisite in addition to having been in the VET industry for at least 2 years.

Compliance to the Standards is the key.

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

- Should the TAE Certificate IV be changed to include 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:

- Plan and organise assessment covers developing a simple assessment tool. *TAEASS502B Design and develop assessment tools* should stay at the Diploma level as it is a complex unit.

- If the majority are saying you need a practical component, then it should be investigated further. All stakeholders need to have a say, if this paper was delivered to all trainers through a national professional association, then all stakeholders would have the opportunity to provide feedback.

- Responding to the VET industry- Cert III TAE could be an entry level qualification when you are given materials and resources to deliver and assess, this is a pathway which could have traineeships. Units could be - conduct training, conduct assessment, work in the VET industry, particapte in validation, participate in PD.

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:
- Yes, could be similar to teacher's registration where you have provide evidence of completing and attended PD.
- Needs to be compulsory rather than voluntary. If it is voluntary you may find that only people or RTO's who provide excellent training may join.
- A desire to maintain professional standards, compliance to the standards.

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:
- PD, advocacy, promoting the VET profession, interaction with industry to ensure VET is meeting industry needs.
- At a national level would provide a consistant approach across Australia.

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:

1. Model B, simple and straight forward with all individuals being able to have a voice and it does not go through many channels. As VET is a national body to standards it does not need to be by State or Territory.
2. It would make it more valued as a professional industry
3. A combination of both Individual Fees and Govt funding.
4. Mandatory. This makes it a standard that all have to adhere to and brings professionalism to the industry.

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:
IBSA capabilities framework. This provides a structured self-reflection tool which could form the basis to provide PD and a tool to monitor the trainers and assessors.

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:

- VET certificates need to have industry involvement as we are training people to meet the needs of industry. If industry are reflecting back that students are trained and exceeding expectations, training outcomes are meet, if not then more involvement of industry is required. Industry involvement could be stronger in VET in schools and SBA's to ensure standards and expectations are meet.

- Under the new standards 1.11 industry may be involved in validation. A change to this could be someone who is the end user or employer.

- If TAE holders are delivering quality assessment, why would we ask for this to be done again?

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:
- Industry guide what a competent person looks like. Industry should feedback to the RTO if they feel a student is not competent in the areas they should be.
- Industry should and are required to attend validation to ensure assessments are meeting industry standard. It may be a good idea for industry to hold the assessment skill set to ensure they are able to understand training packages and certificate components.

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:

Suggestions

- External/ industry validation of sample student work could be completed to ensure consistency.
- In areas of high risk a person should not be deemed competent until they have had log book sign off of on the job practice/training.
- Possibly mandatory hours of on the job training are required per unit of competency which would be based on the risk and informed by industry.
- Online courses should be monitored to ensure the work is authentic.
- If reassessment is required this could be completed by an RTO which has passed audited and has reliable and consistent contact with industry with excellent assessors.

- Samples of students work could be moderated at validation sessions where industry were attending.

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:

- Does industry expect too much from various qualifications?
- VET is assessed on being competent at that time, they are competent to complete a task, not assessed as job ready. Often when students finish their qual, they are entry level. Trainers are not trained in TAE to assess students as job ready.
- If there are gaps identified by industry, then industry needs to be involved in the design of Training Packages.

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:

- New standards implemented which are still around process rather than output.
- Keeping assessments for longer than necessary will not change the assessment decision. It would be better to have samples of student work seen by industry or auditors.
- Does ASQA have currently have the capabilities and resources to thoroughly audit the RTO's?

Suggestions:

- Auditors interview employers, students and trainers to ensure competence.
- Feedback from employers to the RTO 6 months after student has been employed.
- Internal audits submitted to ASQA and at audits.

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:
- This comes back to the quality of TAE trainers and the RTO's. The standards need to be enforced and RTO's audited to ensure compliance especially in high risk areas.
- If students are to be reassessed then it should be done by another RTO and within a time period as students were assessed as competent at that particular time. If there were nationally agreed or approved assessment tools then assessment would be consistent at a national level.