



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

Thank you for the opportunity to respond to the Quality of assessment in vocational education and training.

In 2015 Western Australia's educational system changed to two streams, ATAR for students wishing to enter University and a General course for students entering TAFE or the workforce. To gain a Western Australian Certificate of Education in 2016 students must have completed an ATAR course or a General course with a Certificate II or higher.

The Catholic Education office supports colleges by liaising with industry organisational bodies for VET currency for teachers and state and federal government for funding. In 2015 there were 4,962 Year 12 students enrolled in VET of which in Years 10 – 12 1,109 were made up of Certificate I's, 1,682 Certificate II's and 638 a Certificate III's. 41% of students within Catholic schools completed a VET certificate and Catholic schools made up one third of the top 50 schools in terms of the percentage of VET students completing a Certificate II or higher in 2015.

The Department of Training and Workforce Development and industry developed a Qualifications Register that now appears mandatory through the TAFE system by the controlling of funding to certificate levels and industry areas offered in secondary schools. Private RTOs are still able to offer, on a fee for service basis, various qualification levels for secondary students in schools.

Within the Catholic system in Western Australia there is only one college, an Agricultural College that is a Registered Training Organisation so we rely heavily on state and private RTOs for quality training and assessment in VET.

An auspice arrangement is the most popular and cost efficient way VET is offered in Catholic schools. The Catholic system in WA offers guidance when suggesting Registered Training Organisations and certificate levels to suit the secondary students within the schools and the relevant school resources available.

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:

Agree- Relatively large numbers of RTOs can deliver TAE qualifications or skill sets however all should be of a high quality.

Agree - RTOs should be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors. This could be considered to be restrictive trade practice and not sustainable.

Agree -Recognition of prior learning for TAE qualifications or skill sets has sufficient rigour.

Agree - TAE qualifications and skill sets should only be delivered by VET practioners who can demonstrate a specific period of training/employment history.

Agree - Practitioners delivering and assessing TAE qualification and skill sets should have university-level or higher level VET qualifications to encourage quality training and assessing.

Agree - The TAE Diploma should require a practical component of around 200 hours.

Agree - Entrants to the TAE Diploma should be able to demonstrate employment history before receiving the qualification.

Agree - demonstrating employment history would help to improve the relevance and validity of assessment. Unsure of a specified time limit.

There is a university in Western Australian looking at incorporating the Certificate IV TAE qualification into the teaching degree.

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:

Don't agree - the existing *TAEASS502B Design and develop assessment tools* unit of competency should not be a core unit. There is no need for a new unit to be developed. The RTO needs to develop this for our schools.

Agree - the *TAEASS502B Design and develop assessment tools* unit of competency should be a specialist unit that sits at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors.

Agree - Thorough training will improve assessment outcomes for students however changing the Training Package will not necessarily improve the assessment outcomes for students.

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:

Agree - there are benefits in establishing a national professional association for Australia's VET system. However it should not be a compulsory membership and the drive for it should come from VET practitioners.

The barriers for establishing such a professional body would be the costs and geographic location for all states to be united. The use of technology would be required. The committee would need to be comprised of a range of industry, auditing bodies, RTOs and educational sectors on a voluntary basis.

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:

Agree with the above potential activities for a voluntary VET professional association, if one were to be formed. The benefits would be on a national focus and be comprised of a range of people with a different perspective on VET.

If the body was formed it would need to be in a supportive role and not in a compliance structure.

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:

Prefer Model B- would offer support to the VET trainers/teachers by raising the profile, therefore, assisting in gaining outside recognition. The professional association would need to be open and credible within the governing body and for teacher/trainers have a cross-over of the AITSL standards. The association would be voluntary membership and not mandatory.

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:

Agree - there is an opportunity to make better use of these frameworks and the requirement of more assessment tools. CEWA would prefer more thorough delivery of the Certificate IV Training and Assessment Qualification rather than changing the training package.

However, CEWA would not support more regulation in this area.

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:

- There is the opportunity to use technology more effectively for assessment which would be cost effective for regional areas delivering vocational education and training.
- Agree - Gap training is an option.
- Disagree - Results of tests should not be made public at the RTO level. What sets vet aside is “demonstrated competence” in the workplace. This could not be assessed through an external test.

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:

- The Industry Training Council/Industry would be best to prepare a document on defining industry standards when considering validating assessment.
- Authenticity of the process is the problem. It can look good on paper however is not necessarily valid in practice.
- Create a register of peak industry bodies that can build industry capacity regarding involvement with training and assessment and make sure the burden is targeted to those within industry with appropriate expertise in validating assessment.

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:

- All above are important.
- Improving RTO practice would be expensive however there needs to be a way of doing this more efficiently.
- CEWA believes that industry should be involved in external assessment when public safety was involved. It would be a concern if this was just on paper and not in practice.
- There could be a random sample range of skills audited to save costs.
- Training Accreditation Council (TAC) or ASQA to be involved primarily however there is concern that a different interpretation by regulators does not give a consistent message to trainers.
- TAC needs to broaden their scope and offer support materials to assist with the auditing process.

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:

- Whichever Government body/committee involved in writing the Training Packages should develop the resources for particular training products.
- More clarity is required for industry regarding the terms “competent” and “job ready”. May never be “job ready” if having different roles within the organisation but can be competent and gaining experience. Employee requires time in any role to gain experience and eventually be competent. The word “job ready” does not imply the age and maturity of the student or competence. Is “job ready” that the employee turns up on time for work and competent having the skills to do the job required?

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:

- Standards for RTOs should be kept the same as they have only recently been changed and need time to strengthen for quality of training and assessment.
- To improve the quality of assessment there needs to be regular audits by an external regulator. Retaining student assessment pieces for longer will not improve the quality of assessment.
- Nationally ASQA is the appropriate regulator to oversee this function and the Training Accreditation Council in WA could be a branch to offer support only.
- Training only RTOs are a good option for people to learn a skill set and don't have the funds to complete a whole certificate. For migrants and Year 10 students they could receive a Certificate of Participation for achieving a skill set.

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:

- Getting regulation bodies involved would assist in moving to evaluating assessment outputs.
- There are too many regulations and the regulatory bodies need to become more involved rather than imposing more regulations. They need to work smarter to offer advice and educate in the auditing process.
- The characteristics of the RTO would influence the response anyway.
- Repeat offenders would be defined by a regular auditing process.
- Regulators should be able to offer advice and educate for more thorough assessments as adequate transparency and disclosure are not evident.

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:

- A scheme for reassessment should be implemented rather than cancelling qualifications as it is not the students fault.
- There are opportunities for students not to be reassessed such as student fraud.
- There should be a time period after which ASQA should not move to cancel an individual's qualification.
- Reassessment and gap training costs should be covered by the RTO.
- ASQA or the Training body should deliver the reassessment and this could be completed using technology, gap assessment in the workplace.