

Improving assessment in VET

A SUBMISSION TO THE QUALITY OF ASSESSMENT IN VET
DISCUSSION PAPER

Submission details

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:

- Community Child Care Co-operative has reservations about suggestions to restrict which RTOs can deliver and assess the TAE qualification. This qualification, like all, should be subject to assessment moderation as a mechanism to ensure the validity of assessments being granted by individual RTOs. Those RTOs found to be awarding the qualification to substandard candidates or having inadequate assessment processes for the qualification can then be reviewed and restricted through the usual audit processes.
- Likewise we believe that RTOs should be able to deliver the TAE to their own trainers and assessors as long as they ensure training and assessment has been as rigorous for their own trainers as for external trainers. As an RTO we believe that by training our own trainers and assessors we can ensure they have the knowledge and skill to deliver courses within our own sector in a way that takes into account the unique characteristics of the childcare sector. As a peak body, we are also aware that some RTOs, even within our sector, do engage in a 'tick and flick' process of their own trainers. Again, we believe that moderation of assessments and assessment outcomes will ensure the issuing of fully compliant qualifications. Additionally

policing who is an RTO's "own" trainers would be cumbersome and hard to assess compliance with.

- Community Child Care believes the TAE qualification, like any other qualification, should be able to be obtained via RPL. In a sector such as the early education and care sector many trainers come with extensive teaching qualifications, often at postgraduate level. This prior learning and experience must be able to be taken into account – RPL removal would be a deterrent to potential trainers and assessors in the childcare sector. A continued focus on ensuring that existing trainers and assessors maintain their skills through regular and appropriate professional development (as already required in the standards) would be of more value than removal of RPL as a mechanism of obtaining competencies towards the qualification.
- Community Child Care also believes that there are opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications.
 - Community Child Care believes that delivery of the TAE should be by trainers and assessors with specialist adult education experience and qualifications, rather than those just holding a TAE, in recognition of the importance of trainers and assessors within the VET system. Coupled with the integrity of the RTO, the skill level of the trainers and assessors delivering VET training is paramount to the quality of that training. University qualifications in adult education would guarantee the theoretical understanding of course design, assessment principles and the mechanisms through which adults learn, but an in-depth understanding of the VET system (as evidenced by experience in the system) is essential to be able to teach the TAE effectively.
 - A practical component must be included in the TAE . In a sector such as the childcare sector where workplaces are mostly small, this is sometimes hard to organise – allowance must be made for this to be completed using the training group.
 - In the childcare sector most trainers and assessors come from within the childcare sector itself. The majority work only on a part time basis within the VET sector, continuing to hold roles as educators within childcare sectors. Any requirement of an employment history in the VET sector would limit the amount of trainers and assessors available and the potential loss of skills and knowledge that would advantage the sector.

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:

- Community Child Care Co-operative does not believe that the core issue with assessment is the inability of qualified assessors to design and develop appropriate assessment tools is the core of the issues with the quality of assessment in our sector. It is rather, the willingness of some RTOs to graduate students regardless of the standard of their performance on assessment tasks.
- Within the VET sector the voices of those representing a sector such as childcare can often be overlooked. Community Child Care believes wide consultation will enable sectors such as ours to raise issues it believes impact on the qualifications gained by those delivering training to those in our sector.

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:

- Community Child Care Co-operative believes that the VET sector is a sector awash with organisational players. We see no value in establishing another organisation to co-exist with organisations such as ACPET, VELG or ASQA. There are many strong voices in VET and the strongest voices are not necessarily the most knowledgeable. It is more important to sectors such as childcare that our trainers and assessors are members of the appropriate professional bodies within our own sector, rather than a professional VET association, especially given that many of them only work on a contract basis as VET assessors and trainers.

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:

N/A as per answer to discussion point 3.

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:

N/A as per answer to discussion point 3 but if an association is formed membership of any professional association of this type must be voluntary.

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:

- Although the existing capability frameworks adequately delineate the roles held within the VET sector, Community Child Care does not believe extending or making better use of these frameworks would enhance the assessment capability of the VET sector. Again we reiterate it is the will of individual RTOS to apply rigorous assessment to its students' work that is the key factor in assessment not what roles are deemed capable of undertaking this assessment.

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:

- As a peak organisation in the childcare sector Community Child Care is aware that there is a range of dissatisfaction in our sector with the accuracy of assessment. We believe that the following mechanisms may help strengthen the sector's confidence that candidates declared competent are competent:
 - Requiring RTOs to be involved with the industry they are delivering qualifications for. Embedding this requirement in the standards has encouraged RTOs to seek ways of formalising relationships with sector organisations and documenting that involvement. RTOs with adequate assessment processes in place within our sector, on the whole already had such relationships in place.
 - Assessment is, at the end of the day, only one component of ensuring industry satisfaction with graduates. In the childcare sector dissatisfaction often occurs because of what is/what is not included in the package and the competencies. Updating training packages in our sector seems to be a hurried task that does not allow for a disperse sector to actively engage in debate as to what should and should not be part of the package.
 - Childcare services often interview candidates for positions who they quickly realise may have the required qualification but have not undergone a rigorous assessment process to achieve that qualification. When this occurs rather than simply not employing the candidate, a simple process should enable a service to flag an RTO that may be engaging in "tick and flick" assessment. If numbers of candidates studying at the same RTO were reported, this could trigger a random moderation process of that RTO's assessments.
- Externally administered tests are not appropriate for the education and care sector as they would encourage teaching to the test rather than teaching for the full range of skills required in

a childcare workplace. We acknowledge that there may be a place for standardised testing in some qualifications/ skill sets in some sectors/industries.

- Our sector is subject to an external ratings process to assess the quality of service provision. Within this external moderation (of a sample of ratings) is employed to ensure consistency of ratings. We believe such a process is cost efficient (as it involves assessing a sample of results only) but adds to the validity of the process (those professionals undertaking rating are aware of the possibility that their ratings will be subject to external moderation. We believe this process could also work well for assessment in the VET sector.

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:

- Community Child Care Co-operative does not believe that there is a role for employers or industry groups in the validation of assessments. What our sector and what employers want in our sector is appropriately trained (and adequately assessed) but sector organisations have neither the time or the necessary skillset to be involved with determining the validity of assessments made by a myriad of RTOs. The sector would be interested in being involved in reflecting to those updating packages and formulating assessments what is and what isn't an appropriate assessment to assess competency on skills within our sector.
- Community Child Care is aware that there is a need to build industry capacity and capability regarding involvement with training and assessment. Our sector does not have a clear understanding of VET training, processes, how packages are updated and how to have input into this process and how to engage with individual RTOS. We believe that there could be a greater role for ASQA in this area. Employers need to know how processes and changes in the VET sector impact on our industry. This would also enable RTOs to spend more time on improving assessments and less time on basic sector education about the VET system.

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:

Community Child Care Co-operative believes that independent validation of assessment should be conducted via a moderation process triggered by:

- Complaints by a particular industry about graduate knowledge and skills
- Complaints about the graduates of a particular RTO
- An updating of an a training package
- Receipt of government funding

- We believe that a moderation process is preferable to independent assessment of an entire cohort of graduates. By sampling and moderating individual candidates, RTOs would have the opportunity to improve their own assessment processes in line with others offering the same qualifications and in line with industry expectations. Moderation becomes a powerful education tool. It is our perception that a major issue in VET is that people have differing interpretations of standards and words. Moderation of assessment would help to ameliorate this issue.

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:

- Community Child Care believes strongly that there is a need for Government (ASQA in particular) to increase its role in educating industry about VET graduate expectations for training products and qualifications within that industry. In our sector there is a lack of understanding of the VET process per se, the components of the training packages, the competencies graduates will have and the differing competencies graduates doing different types of qualifications can reasonably be expected to have. Anything that ASQA could do in this regard would assist to increase industry understanding of VET training and be in a better position to assess whether graduates that are declared competent are actually competent against the competencies they have been assessed.
- There is a common understanding of VET system outcomes by those in VET. It is employers that miss this information. Employers have responsibility to orientate and mentor new employees. New graduates have may the skills and knowledge to do the job, but need to learn how to apply their skills in a particular workplace, with those colleagues. There needs to be further education of employers of how far VET training can (and can’t) do in this regard.

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:

- Community Child Care Co-operative does not believe that the standards relating to assessment need to be strengthened. The process and the expectations are clear. Additional information and education regarding interpretation of these, and indeed of all the standards are needed however, and this could be a useful an outcome of this focus on the assessment process.
- As we believe a moderation process of assessments (at the assessment output level) would improve the quality of assessments, requirement for RTOs to retain all assessment samples until such a process was undergone for each cohort should be required.
- We believe that ASQA should be the agency to undertake this moderation as the organisation is already in place and they have the capacity to conduct this across Australia. This should be done in consultation with the VET sector to determine the benchmark against which assessments are moderated against.
- Community Child Care is keen to see research conducted into the impact of such a moderation process on workplaces, student and employer satisfaction with VET training.
- Community Child Care believes that there is a role for RTOs that do training only, outsourcing their assessment to specialist assessing RTOS, but their needs to be mechanisms built into this process to ensure that teaching to assessment only does not occur.

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?
- 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?

COMMENT:

- The moderation of assessment process we are suggesting needs to be partially enforced by regulation and partially enforced by education.
- That said, we believe that any RTO that is repeatedly non-compliant in assessment or any other areas of operation should not be able to continue to operate. In our own industry the penalties for non-compliance are high and compliance and knowledge of the regulatory requirements are consequently also high. We would like to see this extended to the VET sector.

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:

- Community Child Care Co-operative believes that where inadequate assessment has occurred, the power to cancel qualifications should be exercised as long as individual students are assisted to have their qualifications confirmed through RPL by existing employers or by re-assessment and gap training by the issuing or another RTO. It goes without saying that where an RTO has been found to be performing inadequate assessments the cost for that RTOs students to have a re-assessment process and or gap training must be covered by the initial RTO. The impact of cancellation of qualifications for those using the qualifications in their current employment should always be at the forefront of decisions on this issue as well as the impact on the employers. In our industry, inadequate assessment endangers children's lives. It is more important therefore that the larger focus should be on ensuring assessments are adequate before people enter the industry with their VET qualification rather than cancelling the qualification if it was issued by virtue of an inadequate assessment process.

- Community Child Care Co-operative also believes that a tuition assurance fund should 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. We do not believe that RTOs should be contributing to this fund. It is the Australian Government that sets VET regulations, that endorses RTOs and audits them. Well performing RTOs should not be financially responsible for the failure of government to ensure compliance to regulations or to the creation of incentives which allow the conditions for fraudulent and inadequate assessment to flourish.