Introduction

The Community Services Health and Education Training Council (CSH&E TC) WA is one of WA's ten training councils. One of its KPIs with the WA Department of Training & Development is to consult and liaise with Industry Skills Councils (ISCs) in respect to the Training Packages covered, i.e. the CS&H ISC for the CHC and HLT training packages and IBSA in respect to the TAE training package.

WA Consultations

The CSH&E TC uses Industry Advisory Groups (IAGs) as its main links with industries and RTOs in relation to training package development. In respect to the TAE training package the TC's TAE IAG meets at least four times a year and includes a healthy mix of public and private RTOs (NFP & commercial).

Quality Training & Assessment

Issues related to training quality and assessment have frequently been discussed in all the CSH&E TC's 16 sector specific IAGs. However, it was felt that the TAE IAG would have the most to contribute in relation to providing feedback to the Department of Education and Training's quality and assessment paper. The responses to the feedback template shown below were gathered at the meeting of the TAE IAG on 26th February 2016. What follows in the template is a consolidated WA response to the issues raised in the 'quality of assessment in vocational education and training – Discussion Paper'.

Two other members who could not attend the meeting provided extensive feedback (i.e. Dr Sharon Ross and Teresa O'Brien from C.Y. O'Connor Institute).

Members who attended the TAE IAG meeting on 26 February 2016 were:

Name	Organisation
Jeremy Trott	Training Services Australia
Vivienne Scott	Central Institute of Technology
Linda Holmes	Polytechnic West Institute of Technology
Sue Bass	Polytechnic West Institute of Technology
Kelli Gordon	Polytechnic West Institute of Technology
Kathryn Thomas	Challenger Institute of Technology
Lorraine Tomlinson	Challenger Institute of Technology
Robyn O'Neill	West Coast Institute of Technology
Anne McCarthy	Department of Fire & Emergency Services
Jane Lorrimar	Department for Child Protection & Family Support
Melissa Kuhlmann	AVELING

Paul Muenchow   WA Department of Training & Workforce Development

Rosemarie Algeri   WA Department of Training & Workforce Development

Sam Holtham   Fremantle Education Centre

Antony Atkinson   Phoenix Academy

Ian Andrews   CSH&E Training Council (WA)

Arti Dogra   CSH&E Training Council (WA)

Issues related to questions 11 have been raised in our responses to the preceding questions. Rather than duplicate its earlier comments the IAG felt there was no need for additional responses to questions 11

Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

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:

1.   The number of RTOs delivering TAE qualifications and skill sets appears to be too high (with over 15% of RTOs scoped to deliver TAE40110). Reducing the number of RTOs should make it easier for regulators to monitor and manage those scoped to deliver these qualifications and skill sets.

Measures that can be used to reduce the number of RTOs delivering TAE qualifications and skill sets include:
- Requiring trainers delivering the Certificate IV in Training and Assessment to hold a Diploma level VET qualification or higher (the Standards for RTOs require this to occur from 2017)

- Only permitting RTOs with demonstrated experience in the sector to deliver the TAE40110 (this has recently been introduced into the Standards for RTOs)

- More carefully reviewing RTO's training and assessment strategies for TAE qualifications and skill sets before they are granted approval to deliver them

- Increasing the frequency of reviews by the regulators to ensure that RTOs remain compliant.

- Ensuring that the Volume of Learning for Cert IV delivery includes clear and prescriptive requirements for Assessment Requirements at the unit level. This potentially could reduce the number of RTOs who offer quick and easy Cert IV TAE certification.

- More rigorous and frequent auditing those RTOs delivering TAE qualifications and skill sets

- Poor quality delivery and assessment of TAE qualifications is due to ineffective application of the regulations. More time should be spent by the regulator reviewing the training and assessment systems of those wishing to deliver TAE qualifications before those RTOs are given approval to deliver. If done properly, this should help to weed out some of the lower quality providers. Regulatory policy and actions including legal implications of cancellation of TAE qualifications, infringement notices and penalties with clear criteria can potentially eliminate unscrupulous RTOs who engage in poor practices and offer quick and easy certification.

- Reducing the number of RTOs delivering the Cert IV qualification may increase its status

- Promotion of a professional association which could recognise quality assessment and validation processes.

- Requiring RTOs to have their assessment systems for TAE qualifications and skill sets independently validated (as is now required under the Standards for RTOs). However, this requirement should be taken a step further by requiring RTOs to source the independent validator from a <u>government appointed panel</u>.

- Reducing the size of the market by creating qualifications and skill sets for those who work as trainers and assessors in industry but who are not part of the formal VET sector.

It is not appropriate to reduce the number of RTOs through the use of a quota system, although it is acknowledged that the regulators may wish to have a target number of RTOs from the perspective of managing the quality of providers.

2.   Providing an RTO delivers TAE qualifications and skill sets correctly, and takes steps to avoid conflicts of interest, there is no reason why it should be restricted from issuing TAE qualifications or skill sets to its own trainers and assessors.

Logically it would appear in the best interest of RTOs to deliver training and assessment to their staff to ensure quality delivery and assessment practice of staff within their RTO. Advantages for staff candidates include enhanced mentoring, on-the-job training, work-shadowing, constructive and timely feedback and workplace observation assessment. Potential conflict of interest could be addressed through the use of panel assessment and external validation. This should be underpinned by a robust internal audit process to ensure quality practice and assessment. It is a matter for the external regulator to identify pitfalls through rigorous auditing to determine if these RTOs should continue to deliver to and assess their own staff and identify actions and/or impose sanctions/penalties accordingly.
It seems entirely acceptable for an RTO to deliver this qualification on the proviso that potential conflict of interest has been identified, documented and addressed satisfactorily.
3.   Any RTO with TAE qualifications and skill sets in their scope should be permitted to assess them via RPL. To improve consistency, consideration could be given to providing a standard tool RPL tool for RTOs to use which would be 'deemed to comply' with Training Package requirements providing it was used in accordance with the instructions provided. RTOs could customise the tool to meet local needs, while still having the option to develop and use their own tool if they prefer.

It is a requirement of *Standard 1.12. The RTO offers recognition of prior learning to individual learners*. The offer of recognition of prior learning for TAE qualifications or skill sets is again a matter of rigorous auditing to ensure sufficient rigour and the quality of RPL evidence.

As above, RPL needs to be made available. Therefore, it cannot be restricted without diluting the intent and purposes of RPL. The issue lies more in the evidence that is presented. Validation which includes student work holds some promise for ensuring consistency of the evidence.

On a separate but related matter, it is important that clear guidelines are provided to RTOs about how to manage 'transition issues' when TAE qualifications are updated, particularly the Certificate IV in Training and Assessment, and the assessor skill set.

Historically, each time the Certificate IV has been updated, there has been significant demand from trainers and assessors wishing to upgrade their qualifications in order to maintain the currency of their credentials and to comply with the latest standards for RTOs and / or requirements of their employer. The majority of these people are simply looking to upgrade their qualification, not their skills and knowledge, and many will seek out an RTO which can upgrade their qualification for minimal cost and minimal effort. This has led to inconsistent practices amongst RTOs offering TAE 'upgrades', with some providing the upgrade via a purely administrative process, while others have required candidates to provide varying amounts of evidence of current competency.

The RTOs delivering the Certificate IV in Training and Assessment (and its predecessors) for many years, find it challenging to determine how best to manage transition issues in a way which keeps both clients and the regulator happy, and which maintains the integrity of the new qualification.

Providing clear guidance to all RTOs on how to manage transition issues should help to reduce inconsistencies. RTOs should also be required to explain the process they will use to manage transitions as part of their application to extend their scope, and they should be audited to ensure they are following the approved process.

Equally important is the need for clear guidance that could be used as the benchmark through which to explain to clients why and how the changes have been made, rather than offer them some subjective interpretation to promote and market the course.

The issue of 'non-equivalence' presents challenges for RTOs detailed below:
- The issue of non-equivalence will once again perpetuate the cycle of upgrading and create a market that will be exploited by unscrupulous RTOs who offer quick and easy certification (history will repeat itself eg. BSZ40198 – TAA40104 – TAE40110 – TA40115) It is unlikely to result in any quality improvement.
- The unscrupulous RTOs who offer quick and easy certification appear to be one of the prime reasons why assessor skills and knowledge is impoverished.
- There is a need for clear criteria and guidelines to identify qualifications and/or units that are deemed Not Equivalent.
- The issue of Not Equivalent in relation to the TAE Cert IV including qualifications from other training packages (eg. Community Services) has significant operational and administrative implications that include:
  o Transitioning students in accordance with the timeframe of Clause 1.26 (a) which could require them to enrol in additional units and bear the cost associated with this
  o Added complexities when transitioning apprentices/trainees
  o Time spent in preparing scoping submissions
  o Costs associated with scoping
  o Regulator's capacity to efficiently manage a large number of extension to scope applications from RTOs

It is recommended that at point of endorsement the AISC determines the transitioning period and makes this publicly available (using a criteria checklist for granting extensions to transition timeline)

4.   The TAE qualifications and skill sets should only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector in Australia and suggest a minimum period of six months.

The industry supports the requirement that those delivering the Certificate IV in Training and Assessment hold the core units from the Diploma of VET plus *TAEASS503A Lead assessment validation processes* and *TAEDES502A Design and develop learning resources*. They should be required to demonstrate competency in these units regardless of whether they hold higher (university level) qualifications.

The industry supports the requirement for a practical component for the Diploma of VET. This is already built into some of the units which require a minimum number of hours of training delivery and a minimum number of assessments. Those entering the TAE Diploma should not be required to demonstrate employment history in the VET industry before they commence, but should be required to demonstrate this, by way of practicum, before they complete the qualification.

The qualification description for the TAE50115 Diploma of VET suggests that *"This qualification reflects the roles of experienced practitioners delivering training and assessment services usually within Registered Training Organisations (RTOs) within the vocational education and training (VET) sector. They may have a role in leading other trainers and assessors and in providing mentoring or*

advice to new trainers or assessors as well as designing approaches to learning and assessment strategies across a significant area within the RTO". Therefore, entrants would need to have access to an RTO context wherein they have opportunity to lead roles in mentoring and design.

Similarly, the qualification description for the TAE50215 Diploma of TDD indicates that training developers and instructional designers will have responsibility *"for analysing training needs and designing training solutions and products to meet workplace capability requirements, and evaluating the effectiveness of training programs. They may have a role in providing guidance and advice to trainers and assessors, promoting innovative practices, e.g. e-learning, and in researching and incorporating best practice in training and assessment into training programs and products".* Therefore, entrants would need to have access to an RTO context wherein they have opportunity for performing these roles.

It is difficult to prescribe specific timeframes for Diploma entrants as this could differ among Diploma entrants, their industry and RTO context including their own personal motivation and desire to avail of lead roles in mentoring, design, innovative practice etc. Highly motivated, proactive candidates may achieve more in less time and should not be disadvantaged because of this.

TAE qualifications and skill sets should only be delivered by VET practitioners who can demonstrate broad experience in training, but not necessarily broad employment history in the VET sector. In addition to this, broad and extensive knowledge of pedagogical and assessment theory must underpin delivery at both that Cert IV and Diploma levels in order to address the diversity of backgrounds and vocational experience of clients presenting for the qualification.
RTOs with practitioners operating at this level therefore, may need to be culled as such, so as to ensure that broad academic knowledge and skill inform vocational diversity. This statement is made to ensure that VET practitioners teaching the TAE (IV and Diploma) understand the nature of vocational knowledge clients have, before undertaking the TAE. This knowledge has to be re-contextualised before it is taught to others in the workplace. This is a complex undertaking and requires advanced teaching skills.

5.   The Certificate IV in Training and Assessment and the Assessor skill set have clearly been designed for trainers and assessors who work for Registered Training Organisations, particularly TAFE colleges and other RTOs who operate similarly to TAFE colleges.

The 'one size fits all' approach to the application/implementation of the Cert IV TAE and the absence of an alternative qualification for those not working in 'formal VET' significantly impacts on the quality of delivery and assessment of the Cert IV TAE. Furthermore, national mandates in relation to the TAE (or its successor) exert pressure on employers and/or industry to put their staff through the Cert IV TAE regardless of relevance to the employee's job role or 'fit for purpose'.

However, in the absence of other alternatives, the qualification and skill sets are utilised by many other organisations that employ trainers and assessors, including non-RTOs. In many cases, the qualification is not suitable for these people because it does not reflect what they are actually expected to do in their job roles. Some of the consequences of this include:

- Students do not end up with the skills and knowledge they need to be good trainers and assessors in their industry, because too much of the training time is spent focusing on aspects of the TAE units of competency which must be addressed, but which the students won't use in their job roles as trainers and assessors
- Students are dissatisfied and disinterested in the TAE course because it does not reflect their job role

- Students struggle to complete assessments in the workplace because work practices do not align with the assessment requirements
- Some RTOs may water down their training and assessment to align more closely with client needs and less closely with Training Package requirements

These people, their employers and the RTOs which provide services to them also become stakeholders in consultations about qualifications such as the Certificate IV in Training and Assessment, making it more difficult to achieve consensus on how best to improve these qualifications.

Providing fit-for-purpose qualifications and skill sets for those who do not operate in the formal VET sector will reduce the instances of inappropriate delivery of the Certificate IV in Training and Assessment and the associated downward pressure on the delivery of this qualification.

- 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:

It is not necessary for entry level training and assessment practitioners to have the assessment design skills, as long as the RTO can demonstrate these skills are accessible to the organisation.

The Certificate IV in Training and Assessment <u>should not</u> include a unit on the design and development of assessment tools.   The skill to do this is above entry-level and therefore TAEASS502B should stay in the Diploma, with the option for more capable or experienced Certificate IV candidates to complete it as an elective unit.

The following should also be noted:
- o In many regulated industries 'entry level' trainers are not required to develop an assessment tool
- o While TAAASS403A/B Develop Assessment Tools was a core unit in the TAA40104 qualification it did not appear to achieve improvement in assessment practices which raises the question of the potential for TAEASS502B to achieve this.

As an entry level qualification, the Certificate's Assessor Skill Set provides sufficient knowledge and skill to design a simple assessment tool. If taught well, that should be adequate. TAEASS502B sits better within the Diploma.

In the case of making updates to the TAE, we believe that it is important for the views of all stakeholders to be sought and considered. We are concerned about the ability of certain stakeholders who are 'perceived' to be key stakeholders to have undue influence.
Work is needed to look at who is using the TAE40110 qualification and its fitness for purpose. There are currently too many 'square pegs' trying to fit into a 'round hole'. Creating qualifications and skill sets which meet industry's needs for trainers and assessors (including industry which operates outside the formal VET sector), will reduce the number of stakeholders interested in changes to the Cert IV TAE and increase the consistency of opinion around what changes are needed.

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:

There were mixed responses from the IAG in relation to the need to establish and maintain a presence as a peak body in the national VET sector.

Some members felt that further research on the quality of VET teaching was required to determine the feasibility of a professional association. Research strongly supports the need to develop the capability of VET professionals to equip them to design and deliver diverse innovative responses to meet the needs of a rapidly shifting education and training market. Others indicated that the Wheelahan & Moodie, 2011 research identified strong support for establishing a national professional association for VET and suggested. This was also advocated by Skills Australia (2011) and The Productivity Commission (2011).

However, currently more emphasis and money appears to be spent on compliance while there is a significant body of research to show that improving the skills of educators and teachers is worth investing in and underpins effective education and training systems.

While there is a clear role for Government to assist in the development of professional skills for the VET workforce, currently the responsibility for VET workforce development rests with the states and territories and with individual providers.

Rigid and inflexible funding regimes, onerous red tape, bureaucracy and accountability reporting requirements present challenges and the ability of RTOs to respond efficiently and timely to 'just in time' needs for skills development to address rapidly changing technology and growing industry needs. Furthermore funding cuts and the gradual reduction in availability of funding grants reinforce the climate of fiscal austerity in which we are expected to currently operate 'doing more with less'.

Potentially a national VET professional association could provide cohesiveness among VET professionals for strategic and relevant professional development. A VET national association of sufficient size, coverage, broad and diverse representation potentially could provide a coherent, collective, strong and effective national voice to influence and shape VET policy and practice.

Specific barriers/challenges to establishing a national professional association may include:
- Ensuring and preserving the independence of the association from any form of political alignment and industrial relations issues
- Achieving consensus on function, purpose etc.
- Equal representation from all states and territories and relevant stakeholders – potential for the association to be dominated by particular individuals, voices and interest groups
- Creating incentives for involvement
- Opportunities for all 'voices' to be heard
- Long term sustainability

- o If membership is mandatory it could potentially create another layer of standards in an already heavily regulated VET sector

Members of the Industry Advisory Group (IAG) suggested that there was a need for a professional association that focussed exclusively on education and training sector. An association servicing trainers from all industries and together would make the functioning of the body difficult and the desired results would not be achieved. The IAG suggested that the CSH&E Training Council could increase its services to the TAE sector by providing PD sessions, creating a panel for validation of assessments, and answering TAE training package related queries.

VET professional associations and networks currently exist but tend to operate in silo fashion, are diverse, state and territory based and focussed on needs of particular groups. There appears to be a paucity of research/information evaluating their efficacy to guide current thinking and present a way forward.

- 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:

Rather than a national association, there is merit in establishing state based professional associations. Some of the purposes of these would be to undertake external validation, adopt research-based culture and provide ongoing relevant professional development. This would work to elevate the status of VET practitioners as professionals and to form a counter argument against the pressure from heavy industry involvement in our role.

The VET sector is incredibly diverse. To nationalise an association might be a long term goal. In the first instance a more state based association beginning with existing organisations that fulfil this role. The examples provided above would certainly be the focus for this association.

Member services and benefits in addition to those listed above might include:
- A website containing a range of useful information and links for members to access:
    o information on employment opportunities, career planning and other advice
    o networks, communities of practice and individual experts and mentors
    o a range of social media for social/professional communication (eg. on-line discussion forums, wikis etc.)
    o conferences, events, meetings (national and state/territory)– organised by the association and by other relevant organisations
    o information on relevant and meaningful continuing professional development opportunities offered by a range of bodies and institutions
    o mechanisms for members to document, share, reflect and evaluate on continuing professional development undertaken

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:

We believe that Model B would be most preferable of the suggested models for a VET professional association. A VET professional association could:

- endorse professional development opportunities offered by other organisations with specialist skills and expertise to offer support to VET professionals.

- help ensure that VET practitioners have opportunities to maintain their VET skills and knowledge.

- Give RTOs employing members of the association greater confidence that trainers have up-to-date skills and knowledge.

The professional association would need to be sustained by membership fees from individuals, although some RTOs may elect to pay the fees for their staff. The association may also be able to obtain funds through professional development activities and conferences. Publication of a quarterly e-magazine may also offer the opportunity to obtain funding from sponsors.

While membership of the professional association should be mandatory for full-time trainers and assessors that work for RTOs, some thought will need to be given about the arrangements for others. For example, some industry-based personnel conduct assessment as an adjunct to their principal job-role and may only assess and handful of people each year. It may not be reasonable to expect them to be full members of the association. Furthermore, those who are members of professional associations relating to their area of vocational competence may be reluctant to also join a VET professional association.

Consideration should also be given to trainers and assessors who do not work in the formal VET sector. While it may not be possible to make membership mandatory for these people, the association should look at catering for them in some way.

Easy access at single location of resources to support VET practitioners would also be helpful initiative.

It would be imperative that the association establish a voice with which to work with and inform industry on teaching and assessment methods. Otherwise, VET practice will continue to be at the mercy of industry whose criticism of the sector has not gone unheard.

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 group is familiar with the VET Practitioner Capability Framework developed by IBSA and can see the potential for practical applications in:

- The engagement of VET practitioners
- Professional development of VET practitioners
- Performance appraisal of VET practitioners

The Department of Training and Workforce Development (WA) has aligned its professional development program to this Framework (http://www.vetinfonet.dtwd.wa.gov.au/ProfessionalDevelopment/Pages/ProfessionalDevelopment.aspx). The group envisages that a VET professional association may do something similar.

Some RTOs have tailored and implemented the VET Practitioner Capability Framework developed by IBSA as part of their staff development process and the self-evaluation process has enabled staff to reflect and track their development and engage in professional dialogue regarding this during their performance appraisals with their line managers to identify their strengths and opportunities and areas for further development.

VET practitioners need time to develop skills and implement and trial innovative approaches – while many do this over and above their existing workloads, governments and RTO managers need to recognise and provide time and an environment that truly supports an effective learning culture.

The current framework could be enhanced by considering its applicability to part time trainers and assessors who work in industry. There are significant numbers of people in these roles, and an additional level may need to be inserted in the framework (before Level 1) to reflect their roles.

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:

Industry-endorsed, externally administered tests currently exist in specific industries and are of value in high risk areas where registration bodies control the licence to work.

However, applying a blanket approach would be unnecessarily burdensome for vocational areas where the risks involved are quite low.

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 glossary in the Standards for RTOs 2015 defines 'Industry' as follows:
Industry means the bodies that have a stake in the services provided by RTOs. These can include, but are not limited to:
a) enterprise/industry clients, e.g. employers;
b) group training organisations;
c) industry organisations;
d) industry regulators;
e) industry skills councils or similar bodies;
f) industry training advisory bodies; and
g) unions.

- While this broad based definition allows for choice, VET trainers and assessors need clear and practical guidance and advice on how to strategically engage and choose industry representatives and/or employers that could value add to the assessment and validation process.

- Maximising industry engagement and participation in the validation process can be challenging, time consuming and onerous and places additional workload pressure and financial considerations for the RTO for these reasons:
  o Industry may not necessarily possess the skills to determine whether or not an assessment or tool has or will produce the right outcome. This is a specialist skill which is not necessarily part of the skills of an industry.

  o It can be difficult to find available, suitably qualified/knowledgeable industry representatives especially in regional areas where local, small businesses tend to predominate

  o Employers they do not have the relevant expertise in assessment and validation (assessment theory and practice) and don't have the time or often don't see the need to develop this – business productivity and profit is paramount for them. The educative process will be slow challenging and long term

- o There needs to be some incentive for the right people from industry to participate – in many instances they are not encouraged to take time out from work to attend and/ or are not interested in participating as they don't see it as their responsibility.
- o Industry, if productive and efficient doesn't have time to involve itself with training and assessment. This is the domain if the training and the VET sector. In regional areas, in particular, the level of regulation and its concomitant compliance required has created a major chasm. Industry has the right to inform training and assessment approaches, but it is too busy to concern itself with the training industry. That is the role of the education and training sector.
- o In some instances where employers/industry engage in validation it does not necessarily value add and/or address the issue of poor assessment as time constraints often reduces the validation process to a 'tick' and 'flick' exercise
- o Employers/industry are involved in the development of the Training and Assessment Strategy (TAS). They are reluctant to further commit time towards validation. Monetary compensation for time spent in validation is expected which imposes an additional financial burden on RTOs.
- o Many RTOs have been proactive in establishing partnerships with each other for the purposes of validation in specific industry areas -this practice could be encouraged and promoted
- o While an independent validator may help to address the quality and rigour of assessment there is potential for RTOs to engage a 'mutual' friend to undertake the process.

- Greater emphasis should be on the validation process supported by a clear, transparent and well documented validation report that clearly details the outcomes of the validation, the lead validator's recommendations for improvements to assessment tools or assessment practice, follow up actions undertaken, legal and ethical responsibilities of assessors – this should be supported by well substantiated examples of student work.

- Industry has been extremely vocal over the last few years. Loss of confidence in the VET system has been brought about by industry. Yet, when asked to contribute to training and assessments processes and systems to enable greater confidence, there is either a deafening silence or there is a demand for remuneration.

- Industry is not monolithic, yet 'it' has an important role to play in validation. If industry develops the Training Packages, and the VET practitioner trains and assesses what it develops, then they have played an initial role. The role of Industry then might be to provide feedback on the graduates of the qualifications without necessarily implicating the teaching and assessment process as being part of the problem. The inherent problem then becomes one of industry criticising a system and a process which they have had significant input into, yet this input may not be representative of 'industry' in the broader sense.

- The undue burden of engagement with industry derives from the exclusive language of the vocational sector. As indicated previously Training Councils in WA provide an effective means in which to validate across RTOs. This council might be better developed, alongside the development of industry advisory groups, to provide the consultation required by assessment validation. Herein, you have the industry expertise as well as the training experience, each which sits independent of the busy and productive nature of 'real' salt of the earth industry as it exists in all metropolitan and regional areas of Australia.

- 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:

Assuming the definition of 'independent validation' is similar to external validation, it would be prudent to identify those high risk areas where poor assessment could lead to harm.

Additionally, if there was a genuine need for industry to be reassured about the quality of assessment, it is possible that a set of valid, generic and mandated tools be developed by such groups. This would eliminate the need for a great deal of angst, cost, and stress by VET practitioners in their attempts to gain access to elusive industry consultation and engagement processes, thus giving back to VET practitioner his/her professionalism judgment across every aspect of their practice.

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:

Development of training products is a complex process involving collaboration at various levels. The term 'industry' is used loosely- no clarity on who/what constitutes industry in the context of Training Products development and maintenance.

Some guiding principles for development of resources are provided below:

- It must be guided by an educational philosophy which recognises the need for industry to develop innovatively and technologically in global and competitive markets.
- Broad stakeholder consultation is essential regardless of the procurement of services approach.
- Emphasis on education and training and quality outcomes
- Needs to be public and community owned asset
- Needs to embed the importance of vocational education as a valuable form of 'life-skills' education for many marginalised and oppressed groups in the community.
- Streamlining and de-regulation must be balanced with necessary oversight mechanisms to ensure quality training products of national portability and international comparability.
- Must guard against vested interest and monopoly of TP development by large industry conglomerates who have greater capacity for financial co-contribution.
- While allowing for input of small businesses must ensure that this is not a deterrent to national progress and productivity.
- A robust framework that enables end user (RTOs and other relevant stakeholders) input into the development process
- Utilise State Training Authorities and the state Training Councils as conduits of the collective voice of training providers, community, small business etc.

- 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:
Issues related to questions 11 have been raised in our responses to the preceding questions. Rather than duplicate its earlier comments the IAG felt there was no need for additional responses to questions 11.

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:

Issues related to questions 12 have been raised in our responses to the preceding questions. Rather than duplicate its earlier comments the IAG felt there was no need for additional responses to questions 12.

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:

Issues related to questions 13 have been raised in our responses to the preceding questions. Rather than duplicate its earlier comments the IAG felt there was no need for additional responses to questions 13.