Submission to the *Quality of assessment in vocational education and training – Discussion Paper*

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at trainingpackages&VETquality@education.gov.au.

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the terms and conditions for public submissions.

Submission details

1. Submission made on behalf of: ☐ Individual   ☒ Organisation

2. Full name:

Brett Schimming

3. Organisation (if applicable):

CONSTRUCTION SKILLS QUEENSLAND

4. Please indicate your interest in this discussion paper:

Peak industry body

    (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.   General comments:

The Discussion Paper (DP) whilst having a focus on assessment attempts to tackle some of, but not all of, the drivers of training quality.

Other drivers that impact on the quality of training that do not feature in the paper include:

- Funding and the behaviours (intended and unintended) that funding mechanisms drive

- Market availability of a pool of talented trainers and assessors with relevant industry experience and currency and RTOs' capacity, capability and commitment to maintaining a quality teaching workforce with up to date occupational knowledge and training and assessment expertise

- RTOs' and their trainers' and assessors' understanding of the complexity of requirements (partially captured in TAE discussion) particularly in meeting industry currency standards which ensures that learners are receiving contemporary industry skills and knowledge as well as the less understood requirement of maintaining and enhancing their skills as teachers and trainers, and

- Absence of standards and benchmarks from the regulator(s).

- 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:

For industry practitioners (for example tradespersons) moving into training roles with RTOs there is a need for the TAE to focus on andragogy, the actual craft and skill of teaching adult learners, as much as on the system of VET and the breaking down of training packages. It would appear crucial therefore that TAE qualifications and skill sets should only be delivered by VET practitioners who can demonstrate not only a specific period of training and/or assessing employment history in the VET sector but also are considered highly engaging and skilled trainers and assessors themselves.

There is potential benefit in restricting RTOs from delivering the TAE to their own staff as a means of:
- ensuring that the process is sufficiently independent of the RTO employing the trainers and assessors (avoiding 'Caesar judging Caesar')
- providing an opportunity for sharing of ideas and different approaches to andragogy than one RTO itself may consider if it did not look to others for inspiration
- establishing communities of practice that support best practice learning and assessment as well as future opportunities for moderation between RTOs.

CSQ does not believe that the numbers of RTOs delivering the TAE should be restricted or limited. If this was to occur, on what basis would it be done given that those RTOs with the TAE on scope have

already met requirements under registration that they are capable of delivering the TAE? The system of registration and regulation arguably provides the means currently to ensure those that do not provide quality training are not able to provide the training.

3.	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:

The unit TAEASS502B Design and develop assessment tools should be a core unit and not an elective unit as a means of giving trainers and assessors a better understanding of the mechanics of assessments which should have a flow on effect to the quality of assessment delivered.

4.   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:

Whilst the benefits of a national professional association are apparent, such an association would need to have mandatory membership and would need to provide a set of standards in addition to the TAE.

The most useful purpose of such an association would be to provide a framework for competency and ongoing development of VET practitioners.

A range of competency and capability frameworks, one is identified in the Discussion Paper, are in existence as are VET practitioner networking arrangements. Mechanisms are already there to support RTOs and trainers and assessors where there is a commitment and willingness.

A barrier to the introduction of a VET professional association would be the perception (and potential reality) of creating an additional layer in an already complex system.

5.   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:
See previous comments at 3.

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

- Which of the suggested models for a VET professional association would be considered most preferrable and viable in the current VET environment? Model A,B or C?

- What value would a VET professional association, or associations, add to the VET sector?

- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?

- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

COMMENT:

See previous comments at 3. The value could be in providing a nationally consistent, recognised capability framework.

7.	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:

An audit of existing resources in terms of capability frameworks should be undertaken to identify best practice examples that can be utilised regardless of the establishment or not of a VET professional association.

8.	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:
See comments under 9.

9. 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:

Some Queensland construction industry leaders in recent forums such as ConstructionQ have identified a desire for independent assessment of training along the lines of the capstone testing model in the electrical sector – either industry-led or from a body other than the RTO delivering the training. The biggest challenge to this is the impost and cost to industry of such a system which also hinges on the industry's capability and capacity to deliver a system of independent assessment.

Whilst independent assessment may act as a safeguard or act as a gatekeeper for quality, it does not address the issue of delivery of quality, industry-relevant training.

Industry confidence and validation at the training product (training package and qualification) stage so that employers are assured that what is being delivered is relevant and current and sets learners up to be able to perform the job (with the understanding that the graduate comes out as a "P" plater not an expert tradesperson). This is the point at which industry via the training package development and review arrangements can ensure relevance and currency of training product as well as articulating industry expectation of graduates.

Employers' involvement in on-the-job training and assessment under the apprenticeship / traineeship model is also the point at which industry validation becomes enacted and that employers themselves have a role in assessing whether they are confident in the industry skills and knowledge of the apprentice / trainee. The challenge in this space is the employers' understanding of their role and their individual capacity to assess on-the-job competence. Offering a training and assessment qualification to the employer has been trialled before and does not appear to be the answer - how can government and industry better equip employers to understand their role in on-the-job training and assessment and support them to effectively leverage the opportunity it provides to effect the quality of skills in their industry as well as holding the RTO to account on the level of quality of their delivery of the off-the-job training?

10.	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:
See comments under 9.

11. 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:

This aspect should form part of the training package development process.

12.   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:

No comment.

13. Discussion questions – enforcement:

- How could the focus of regulation move to evaluating assessment outputs?

- Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? For example, should the regulator have an explicit administrative power to require a RTO to arrange and fund external reassessment, or should additional civil penalty provisions be created?

- To what extent should the characteristics of the RTO influence the response? Should the size of the RTO or the number of students involved matter?

- Given the need to balance procedural fairness with swift and effective enforcement action, what methods should be available to the regulator to manage RTOs that are repeatedly non-compliant with assessment requirements? How could such repeat offenders be defined?

- What role should regulators have in communicating their activities and findings? Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken?

COMMENT:

No comment.

14.   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:

It is essential that there is no disadvantage to the learner – the RTO should bear the cost unless there is evidence of student fraud.