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

Submission details

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

2. Full name:

    Andrew Donne (Acting CEO)

3. Organisation (if applicable):

    Endeavour Foundation

4. Please indicate your interest in this discussion paper:

    Disability Service Provider

    (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.

Endeavour Foundation Background

Endeavour Foundation is an independent not-for-profit organisation supporting more than 3,300 people with a disability from more than 230 locations in Queensland, New South Wales, Victoria and South Australia. The principal activity of Endeavour Foundation is the provision of support services to people with a disability, with a particular focus on people with an intellectual disability.

We are one of Queensland's oldest charities. Today, Endeavour Foundation is a diverse community organisation providing person-centred support for people with a disability as part of the everyday community – through education, training and life skill development, employment, accommodation support, respite and recreation.

Endeavour Business Centre

Endeavour Foundation Training Solutions offers workforce development and solutions for the community services sector. We develop, deliver and monitor tailored workforce development plans and training. All our trainers have hands-on sector experience and extensive skills in training and assessment.

We have established partnerships with Registered Training Organisations (RTOs), and established networks with State and Federal Governments, Skills Councils and Australian Apprenticeship Centres.

Submission

As an organisation that provides services, care and support to people with disability we are concerned with both the quality of assessment in Vocational Education and Training (VET) and student training outcomes in general. Endeavour Foundation is a large employer of disability support workers and as such we are increasingly concerned that some graduates of the Certificate III Disability do not have the required job competencies. In the disability sector the consequences of non-competent graduates working in the field, can have potentially catastrophic consequences for the people we support, our staff and the community in general.

Our response does not attempt to address all areas of the discussion paper. The goal of our submission is to provide the Training and Assessment Working Group with an insight into how poor quality training and assessment can impact on our clients, staff and the broader community. We hope our feedback contributes to improving teacher and student outcomes and assessment in the sector, and as a result improve the quality and level of service and care that the people we support receive.

Registered Training Organisation limitations

In our experience, the current focus of the sector seems to be on audits, compliance and correct mapping of assessment. We acknowledge that this is an important and necessary function, however, what is concerning is that there does not appear to be a commensurate focus on the quality of teaching and training and the subsequent level of understanding amongst students. To ensure the training process is producing competent and job ready graduates, we believe that the audit process needs to be broader and to go beyond a focus on the quality of administrative processes and include a focus on training quality and student outcomes.

We do support restricting the RTOs who are able to deliver and accredit Training and education (TAE) through certain met criteria.

The qualifications that are being delivered by Registered Training Organisations (RTOs) need to be registered and monitored by the sector or the Department of Education and Training (The Department). This would include checking the location of the training, time frame and length of qualifications. Monitoring should be conducted to check that courses are being run as agreed. A further measure to ensure compliance could include spot audits on qualifications. In some cases, courses may not being run over time frames that meet industry and employer standards, so auditing that includes invoice for rental of training space, dates of submission for courses etc. should be sought by the Department.

Skills and Qualifications of trainers and assessors

The skill set, qualifications, and experience required to make a great trainer are vastly different to the skill set, qualifications, and experience required to make a great assessor. Under the current Training and Education (TAE) qualification, trainers are responsible for both the training and assessment component. In our experience this often results in a situation where you have a fantastic trainer who is not completing the required paperwork, or a trainer who is failing to engage students and successfully teach, but is doing a great job on the assessment component. To address this we recommend that compliance and teaching be treated as separate areas.

To further improve student outcomes, there should be a greater focus on the quality of training and the knowledge transfer process, not just the assessment and mapping process. As an employer we have had many experiences where the compliance has been met, yet student training and knowledge outcomes are poor.

The discussion paper proposes a change to the TAE certificate IV to include a core unit on the 'design and development of assessment tools', as a solution that may improve assessment outcomes for students. In our view a focus on the 'design and development of assessment tools' will come at the expense of an examination of the core issue, and that is do the skills and qualifications of trainers meet the needs of students? We need to ask questions about how information and knowledge is transferred; is it done in a way that builds understanding, is it done in a way that encourages critical thinking in order to be able to achieve an outcome under the framework. We believe that a focus on the development of an 'assessment tool' would further drive the compliance reliant audit process. The TAE should be driven by accepted and proven adult learning principles and data driven research.

Vocational Education Training (VET) Professional Association

We support the concept of a national association for VET professionals. We believe it would both increase the professionalism in the sector and contribute to increased quality in assessment outcomes as well as providing a conduit for best practice across the sector. A national association could also play a vital role in aligning career progression with professional registration. VET professionals could be required to meet certain industry requirements (i.e. for trainers 12 months experience with a registered RTO and a diploma level qualification). This system would create a real career pathway and increase the standard and professionalization of workers in the sector, with some even working towards achieving a full bachelor's degree. This would create a greater number of qualified teachers. Those teachers would then be able to be registered as experts in a particular industry.

A VET Association could also positively promote the profession of VET trainers and assessors, including the promotion of a real career pathway. This role is very much needed

in Australia where the VET sector has a relatively low status as compared to school or university based teaching.

Increasing industry confidence

The involvement of the employer in any industry based test or post qualification assessment is vital. There is often a disconnect between what is being taught and assessed and what is required in the workplace. Industry loses confidence in assessment when graduates cannot meet the required job competencies. This is a particular issue in disability services, where a poorly trained and equipped graduate can potentially have a very negative impact on the health and well being of the people we support.

We are particularly concerned that students are able to graduate from a Certificate III in Disability without completing a practical work experience component. This has left us in the situation of hiring graduates with a Certificate III Disability who do not have the required competencies for the job.

For example, we recently employed a person who had completed a Certificate III in Disability, finishing the course with top marks. When he commenced work we quickly discovered that he could not perform even simple tasks in the workplace. He had gained no practical skills in the training. After further questioning we discovered that he had completed the course in just 4 weeks and had not completed a work experience component. Unfortunately, this is not an isolated example. We have many examples of RTOs 'ticking the box' that graduates had completed a work experience placement when in fact they had not.

Role of Industry in Assessment

Industry has a valuable role to play in terms of validating assessment. In an industry such as ours where graduates will be placed in high-risk roles, as they provide care, support and services to vulnerable clients it is vital that they are able to meet industry standards and are capable of performing the practical requirements of the job. The critical task of industry in this process is to ensure that the assessment is reflective of actual practice.

A best practice approach for industry involvement in validation would include the involvement of both employers and service users. Industry and/or employers who are hosting trainees on work placement should 'sign off' on several assessment components based on their interactions with, and observations of the trainee during work placement. To further enhance the assessment validation process and to give consumers a voice, feedback should, where possible be sought from service users.

Specific models

As a disability service provider we operate in an industry where there is a concern for the safety of our clients and staff if a new employee in the workplace has been incorrectly

deemed competent. As such we believe that due to the nature of the work we do there should be a role for external assessment by industry experts. Further, we recommend there should be a national minimum industry standard of training/accreditation for all support staff and that this should be compulsory for all support staff working in the sector. This will be even more important in the National Disability Insurance Scheme (NDIS) environment, as the market expands rapidly to include more Providers (non-for-profit, full profit, contractors and sole-traders).

Industry expectations and graduate capabilities

As long term and experienced employers in this industry, we have found that the content of the qualification and the graduate capabilities do not always meet the requirements of the workplace. We believe that a number of strategies could be introduced to address this. Firstly, to ensure that trainees understand the requirements and realities of the job there should be a one week work placement very early in the training – trainees would then be able to opt out of the courses if they did not believe they could meet the physical and mental challenges of the work. Additional work placements could then be scheduled throughout the course.

The majority of Endeavour Foundation's clients have an intellectual disability, and in our experience the Certificate III Disability does not adequately cover intellectual disability. This is particularly true in regard to understanding non-verbal communication and managing more complex behaviours. The certificate qualification needs to include more components that focus on person-centred approaches, understanding triggers and unmet needs.

Enforcement

The discussion paper raises the issue of enforcement options in dealing with RTOs who provide inadequate assessment. Firstly, it is important to define the difference between assessing poorly and not assessing at all (or incomplete assessment). There is always a level of interpretation involved in deeming someone as competent against an often arbitrarily defined skill. An RTO may deem an assessment as appropriate and the individual may have the skills required, however the assessment evidence is not suitable. This is a different issue to failing to assess a component of a Unit of Competency at all. In our view different responses are required for each of these issues.

RTOs that fail to assess at all and are categorized as falling into the blatant non-assessment category should be subject to the heaviest penalty regime. RTOs that falter on the interpretation of assessment or compliance with record keeping need to be dealt with differently for example be given the opportunity to reassess, or use an independent assessor.