



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

Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

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

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

Submission details

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.

About the Author:

VET is her passion and her professional life. She has been working in VET and general education since 1974.

Before becoming first a VET consultant, and later an RTO (2002), she worked as a Curriculum Manager (1990s) for TAFE (SA) managing the development of course accreditations and later accreditation and management of the ATS. The ATS and its success in SA remains a model of the best entry level training other than apprenticeships and industry pathway programs. In this role she managed the development of an auditable QA system based on ISO9000 which led to many quality improvements and cost savings in training management of the ATS.

In addition to owning and managing a small RTO, Amy is also a highly skilled instructional designer who on sells her training products to other RTOs and to TAFEs through the sister business Sea Eagle Training. Sea Eagle Training consultancy work also sees her keeping current in developing accreditation applications for enterprises.

Healthy Business Training Academy is a distance learning organisation and much of the assessment is RPL. Training partners and contract trainers provide face-to-face training, particularly in vocational specialisations and in regional areas.

In the past two years the RTO has formed auspicing arrangements between HBTA and partner RTOs and high quality non-RTOs. Although this sometimes appears to be like herding cats, the group is highly synergistic and all contribute to cross pollination in assessment practices, support compliance and each other.

Amy's qualifications are:

B.A (Soc Sci); A.L.A (UK); Dip. Ed.; TAE40110; TAE50111; TAE50211; HLT52012; BSB50207; BSB50407; BSB51607; BSB51107.

She also retains a hands on in delivery and assessment, primarily in the areas of health and TAE.

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:

- **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?**

The number of RTOs is immaterial. It is the lack of quality in the providers who issue a testamur after 2,3, or 5 days of training with unsatisfactory assessment standards that are the real problem. By making the TAE a 'Licence to Practice' it has created a cash cow for organisations only interested in maximising profits with no care about creating a workforce of well trained professionals.

The problem would be solved if ASQA audited and removed the lowest common denominator organisations, especially those where people get the TAE one week and begin delivering it the next (it happens!)

- **Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?**

Yes, however it should be noted that some contract staff work for more than one RTO and obtain a qualification from a third party organisation to whom they later apply for employment

Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?

No: **RPL is not an inferior form of assessment but a superior one** if done with due diligence and with the insistence on quality evidence portfolios. 80% of my candidates come in for RPL and back this with gap training where required to bring them up to current standards. This is Best Practice and one which other quality RTOs follow. It is not a tick and flick process and any candidate who does not meet the standards is not issued with a qualification.

- **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?**

Get rid of the cowboys.

- **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?**

Yes, indeed. I would consider at least three years with demonstrated skills portfolio, not delivering tick and flick over and over but a thorough and prescriptive recruitment practice to ensure only the best get to train VET professionals.

- **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?**

They should certainly hold one or both of the TAE Diplomas, as will happen with the RTO standards 2015. I am not sure that holding a tertiary (university) qualification alone would equate to an improvement due to a difference in ideologies and also a lack of experience in delivering and assessing a range of AQF levels. From assessing such qualifications for RPL status I do not accept them without a substantial portfolio that shows evidence of VET practice meeting the competency standards for TAE.

- **Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?**

The TAE necessarily requires a practical component which may either be after the initial training or incorporate evidence of industry training delivery and assessment prior to enrolment in a TAE qualification.

I have some reservations about candidates who want to RPL/CT in a progression from CATII>BSZ>TAA>TAE without offering any evidence of PD or undertaking training to upgrade their skills. I invariably find all such candidates require a measure of retraining even if they have been in a training role for some time due to the constant changes in the industry.

How long is a piece of string? How long the practical component needs to be depends upon prior experience in a training and assessment role. Cleanskins need to have a considerable period of mentoring to develop skills. I am not sure all RTOs have the willingness to invest time in fostering trainer skill development. The good ones do.

There needs to be a clear demarcation between the acquisition of a qualification and competence. The latter can only be attained through professional work practices.

- **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?**

Most certainly because demonstration of the critical evidence can only be provided if the candidate can provide a portfolio of evidence and certified work performance. The Diplomas cannot be seen as an entry level qualification as much of it has to be demonstrated by RPL. The TAE40110 should also be pre-requisite.

As a point of interest, 50% of candidates who ask my RTO for RPL only in this qualification fail to be awarded a testamur outright. Gap training is generally required to bring them up to speed.

I would say that at least three, preferably five years of prior experience is required at a certifiable level of performance. (Not doing bad delivery and assessment over and over.)

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:

- **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?**

New entrants should not be involved in development of assessment tools. They simply do not understand enough of the instructional design constructs to do so. However, they should be taught how to evaluate the assessment tools written by others (and especially those produced by commercial sources) to ensure they meet the principles of assessment and will meet the rules of evidence. They also need to be assisted to contextualise assessment tools for reasonable adjustment or to meet specific industry or workplace requirements e.g. contextualising an imported BSB unit for a health workplace.

- **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?**

Yes. Likewise RPL. Recognition of current competencies is all that is required (skills analysis) at entry level. RPL is too complex for newbies to grasp.

- **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?

In the case of the review of the TAE many well informed people in the industry gave input.

Who identifies the key stakeholders?

75% of trainers and assessors work in industry, not for RTOs. The case was put forward to develop a Certificate III for these people (maybe even resurrecting the BSZ because that met their needs better than a TAE). Then all that would be required if they wished to move to TAFE or work in an RTO would be a top up to Cert IV (as in how to unpack Units of Competency because people out in industry never do this). IBSA accepted that this need existed but did absolutely nothing about implementing it.

As it stands we are training 75% of our graduates in skills they will never use which is contrary to long held VET principles.

Quality maxim: The people who do the job are the best people to say how the job should be done. It is not too risky to do, so apart from those concerned about the nice quid to be made by the same old consultants who do not listen to the industry.

If the Cert III idea had been acted upon maybe there would be fewer 2 day wonders denigrating the professional standards of trainers and assessors.

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:

- **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?**

There is absolutely no need for the government to throw money at this. There are already some well-established and well supported professional associations. To name a few:

- ACPET
- VETIG (Community of Practice)
- VELG
- AITD
- AHRI

All of these are long established, provide members with a great deal of professional information and conduct PD activities. They are fully supported by membership fees which are quite affordable for organisations and individuals.

Providing another funding bucket is a sure way to create another routing avenue.

- **What are the barriers to establishing a national professional association? How could these be overcome?**

What part of totally unnecessary does the government and its advisors not understand?

- **What would be the most useful guiding purpose of a national professional association?**

Really, just leave the existing organisations to do what they do extremely well.

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:

- **What activities would be most beneficial for a national professional association to undertake? For example, would it:**
 - **coordinate, approve or design professional development programs**
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 - **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?**

None whatsoever because the existing organisations already do all of this. Why reinvent wheels?

- **Are there any existing organisations that could fulfil this role?**
- **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?**

See my comments above.

All these things are well catered for. Suggest the government gets advisors with some knowledge of VET and what is already available. As for mandatory or voluntary, a quality RTO looks to employ staff actively involved in such organisations, even if it is just undertaking the PD to meet Standards requirement.

Why are we even having this useless discussion?

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

COMMENT:

No need for models, we have real live examples.

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:

- **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?

These are best used by employers to select staff. Any professionals serious about obtaining more than entry level jobs are well advised to add these to their portfolios.

It is not mandatory, but the wise do this already.

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:

- **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?**

The matter of industry dissatisfaction with training and assessment has been largely disproved by reports issued by NCVET showing that more than 80% of employers are satisfied.

I don't know if any of you people in the think tank are aware of this but we are already required to involve industry in the development of Training and Assessment strategies and in assessment systems.

This total focus on assessments and assessment systems is skewing the whole issue. There is another side of the coin which is the TRAINING system preparing the candidates for assessment.

ASQA does not audit training delivery (perhaps it is too hard because it is much easier to measure outputs than inputs).

A large number of the cash cow rorters fail not only in their assessments **but because they simply do not provide sufficient volume and standard of learning.**

As an example of where it has all gone wrong one only has to look at the C3G scenarios in QLD.

Faced with evidence that providers were issuing qualifications after five days, rather than the six to twelve months required to train in the qualification, they simply cut the funding back to five days' worth of payments. **This did nothing to improve the quality or alter the state of affairs. What it did do was make training non-viable for the quality providers already struggling with a system seriously underfunded to meet quality standards.**

It is simply not worth the time of a quality organisation to be chasing such funding.

Also, from 40 years of VET experience I can vouch for the fact that very few employers understand VET or could engage in a meaningful manner in assessment system development.

- **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?**

The current farce imposed by the Standards of RTOs on conducting validations only after the student evidence has been signed off and the testamur issued is not consistent with Quality Assurance. If industry is to be involved at all in validation it should be from the very beginning by involvement in the development of the TAS or TNA, providing input for the development of training methodologies and assessment systems. Best Practice validates before implementation, checks for quality variances during the delivery and assessment phase and **doesn't issue a testamur unless the candidate has met the competency standards.**

Imposing an unworkable set of validation standards on RTOs has increased costs by 15% (which is the profit margin of most of us) without any actual benefit to CQI.

What academic neo maxi zoom dweebie thought that up without piloting it first with a reputable RTO?

- **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?**

Who thought up this little treasure? **What part of competency assessment being what people can do on the job do they not understand?**

Testing is totally irrelevant in such a scenario. When did you last find an employer who set an exam on the job? There is also no such thing as 50% competent and in some industries only 100% attainment of the whole standard is acceptable.

Where there is difficulty with external testing is illustrated by the RII high risk assessments for dogging, rigging and crane operation. Having been adequately trained and assessed as competent the candidates then have to undertake an external assessment (theory only) written by 'experts' who fail to write appropriate testing materials for the candidate groups, especially in terms of appropriate LLN levels. Attempts from industry and RTOs to make the external assessments meet industry realities fell on deaf ears.

Another example is the failed attempt by CSHISC to develop an assessment package for the Diploma of Enrolled Nursing. The assessments were abysmal, at AQF2 level writing by RNs who obviously got their TAE from a Wheaties Box. The same RNs whom I suspect wrote the un-assessable parts of the latest TP. After complaints from the industry, the assessment tools were withdrawn.

J'ai desparu

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:

- **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?**

Who is industry? In Business Services this can be everyone from the mom and pop fish and chip shop, to home based businesses, to the big international firms. Training is not one size fits all.

- **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?**

No. From 40 plus years of VET involvement I have met very few who could do this.

- **Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?**

From my observations industry is too busy trying to make a quid in difficult times to be remotely interested in this. They have largely abdicated from any role in training and assessment, preferring that the taxpayer do this for them.

- **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?**

There is no way to do this. It is a pipe dream. Back in the day we used to have tripartite committees (employers, unions and government) develop training but those days are long

gone. The current 'validation' methods imposed by the Standards imposes an undue burden on everyone without adding value to anything.

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:

- **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**

A principles based model would be fine if it actually followed QA Best Practice instead of being the academic brain bubble of somebody with very little knowledge of long established validation practices or of the principles of quality assurance. While the focus is on compliance rather than CQI things will not change as an after issue of testamur validation process, as has been demanded of us in Standards 2015 **is too late**. The horse has already bolted.

As an example of this, I was contacted by an SEQ RTO with a reputation for high quality who had validated their assessments after using a highly used commercial resource provider and its sister online learning system. To say that the assessments were woefully deficient was an understatement. The result was that they found that they had issued hundreds if not thousands of testamurs which affirmed a state of competence that did not exist. What were they to do at this point, revoke all the qualifications and make the candidates do the work over?

As I have stated earlier best practice in validation is during TAS development, during assessment development and before implementation, monitoring/auditing the evidence as it is received, moderating border line assessments **and not issuing a testamur where there is no confidence in the result. If one does this consistently there is no need for the cockamamie system imposed upon us by Standards 2015.**

I would gladly write this guide for people. Oh wait, I do and give it to all my TAE and Dip TAE students!

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:

- **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?**

More money being squandered on what does not need to be done.

- **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?**

As stated earlier there needs to be a clear understanding between assessing against the training product and competence, which can really only be assured by on job training and assessment because every workplace has different needs.

‘Job ready’ is a term generally applied to entry level training.

What is generally ignored is the fact that a great deal of training and assessment involves people who have already been in the workplace for some time:

- Upskilling
- Retraining after workplace changes or changes in technology
- Individuals wishing to change career (and don’t want their boss to know about it or be involved in it)
- The Paper Mill: trainers and assessors who constantly have to have the latest piece of paper to meet compliance (in vocational areas as well as VET).
- Also people in the workplace who also have to go through the Paper Mill to be regarded as worthy of employment or promotion.

There are as many system outcomes as there are reasons for enrolment. One of the most important that is overlooked is that employers often don’t want or need whole qualifications, just bolt on training in specific skills. It is the employees who want the qualification.

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:

- 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?

I think the standards are already quite explicit on these things.

What is required is to audit on the delivery systems to ensure quality of training. This does not happen now for (I suspect) two reasons:

- It is not as easily quantifiable as assessment outcomes
- I have yet to meet an auditor who is current in the vocational area that they are auditing. This is not only from my own auditing experiences but from client audits I have attended.

The old QLD system of bringing in an industry consultant to audit the delivery and outcomes in a specialist area worked well. We are charged enough for it. Use some of this money to pay people from industry.

- 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?

Not really, if the assessment practices are bad what is the point. Auditors generally only want to see current evidence and surely with the 'new and improved validation' process in place why would this be necessary?

- 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?

The current system already imposes excessive costs on RTOs. The result has been many fine RTOs simply closing their doors and walking away, leaving the large, poor quality providers firmly in place to milk the cash cow of taxpayer funding.

- Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?

My RTO specialises in assessing students, can I put my hand up for the cash cow milk please?

- 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?

Really, do you think more regulation is going to prevent poor assessment? The reasons for poor assessment lie as much in doling out public funding with no governance as lack of knowledge in the industry.

If more regulation is needed it is in the governance of recipients of public funding. This should not be handed out without auditing the organisation from TAS to Assessment Tools. Problems such as those identified in the Security Industry would not have occurred if someone had the guts to say 'It is not appropriate to issue a high risk qualification without extensive training in a workplace and without training in the legal implications of the job and non-aggressive self-defence training'. Certainly no online only courses should be approved. The failure to do so saw RTOs falling over themselves to get easy money.

Secondly what is needed is a widespread PD of all assessors to bring them up to speed. I recently attended a webinar from a prominent PD provider which said all one needed to be compliant in assessments was ten theory questions, one checklist and a third party report (no matter what the unit or the AQF level). As someone with expertise in assessment practices I was horrified.

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:

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

The whole compliance system is already totally fixated on assessment outputs. Seriously, has whoever wrote this discussion paper never experienced an audit?

- **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?**

If an audit finds that an RTO (or TAFE) is providing inadequate training and assessment (the two go hand in hand) there should be an investigation of why:

- Poorly trained staff?
- Organisation just in it for the money?
- No investment in staff PD or mentoring?
- Use of third party resources without validation?

If one has a disease one goes into remedial therapy or one excises the problem.

If the RTO is willing and able to invest in CQI and meet the standards required, they should be counselled to do so. If the RTO is not truly willing to invest in whatever is needed to be up to speed, they should have their registration cancelled.

Funding external assessment (I suspect someone here wants to grab some taxpayer dollars) is not the answer. Ask the RII providers how well that works.

- **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?**

From my observation of the failings in the industry is it the large organisations with many students who are the worst offenders, yet these are the organisations that the system seems to prefer (fewer people to audit). Small RTOs generally form close associations with employers and students and maintain a better supervision of their trainers and assessors.

From my perspective there should be a more tailored regulatory response to the degree of risk involved.

Additional civil penalties mean nothing if the large organisation can pay lawyers to take it to the tribunal or pay fines.

- **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?**

The Act already gives them teeth. They should use them. Many of the non-compliances recorded at audits relate to procedural and administrative matters. This kind of non-compliance should be differentiated from an organisation that demonstrates poor training and assessment practices.

- **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?**

One of the difficulties I have encountered with the regulators is that they make up hidden rules that have no relationship to the legal obligations and often on matters in which the Act is silent. For example, it took me two years of fighting the regulator on their insistence on reregistration if an RTO merely wished to change from a non-incorporated to an incorporated status with no other changes necessary. Much of my valuable time was spent on getting justice on this because there is no regulation of this in the Act. There needs to be a more collegiate relationship between regulator and providers, such as we built up in QLD with DETA/DETE/DET.

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:

- **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?**

The actions of the Victorian government have paved the way here. What is needed is the national regulator to exercise the power given to it.

- **Should a scheme for the reassessment of students be implemented? If so:**

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Again, the actions of the Victorian government have provided a precedent where qualifications have been recalled and taxpayer funds have been recouped. Those who lost their qualifications have gained the right to another round of funding. VET Fee Help should follow the same process and student debts incurred by fraudulent or incompetent practice be cancelled.

If the assessments are so bad that the qualifications need to be recalled, then it is not just a matter of reassessment because the problem may also be the training methodology and content (or lack thereof).

The qualifications of those conducting any reassessment should be exactly the same as those stipulated in Standards 2015.

ASQA has no expertise in assessment (or training for that matter). If the cancelled qualifications are for entry level, there may be no employers as there are not for many instances of mature aged training and retraining. How many employers would have the skills to assess candidates unless their staff held vocational and VET qualifications as required of RTOs?

Regarding the individual needing the qualification for employment. Are we just there to provide a Paper Mill or there to build skills and productivity?

I will leave you with the conversation between one of my TAE students and one who chose to do a 2-day wonder TAE.

'Why don't you go to a reputable RTO and learn the kind of skills that will get you better jobs?' "I don't want to learn anything; I just want a piece of paper so I can work in TAFE".