![Australian Government — Department of Education and Training]

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:

    Gary Watkins

3. Organisation (if applicable):

    House with No Steps

4. Please indicate your interest in this discussion paper:

    Disability Organisation / RTO

    (i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)

5. Do you want your submission to be published on the department's website or otherwise be made publicly available? ☒ Yes ☐ No

    a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous? ☒ Published ☐ Anonymous

    b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

1. Discussion questions – RTO limitations:

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?

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

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

    - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?

- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?

    - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?

    - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?

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

    - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

- 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?

This is quite a complex question.We believe that a RTOs should be allowed to deliver the TAE but they must be subject to external audits of process. If you review the number of current RTO there is little or no consistency in Cost, time of delivery or validity in the training. Given we operate in a flexible world the restriction of practice for RTO's in terms of the training of their trainers is a difficult situation. It should be noted the issue is not the number of RTO's but the quality of the training that is being provided by those RTO's who have T AE on the scope.

By exploring the various RTOs it should be noted the difference in in time, costs and requirements vary from organisation to organisation. When new trainer qualifications are gazetted, RTO's must be able to prove the quality of their training program, the trainers providing that training and their assessment tools. I noticed in a trip to Singapore some four years ago that the Singapore government had adopted the idea of one provider of trainer qualification. Thisfails to accept that individuals and organisations will have different requirements. We note belowthat the Singapore government has adopted four levels of trainereducation.

Further to the argument whilst we accept the need for solid trainer education in the delivery of VET products if we are to adopt such a principle that we hope that universities would adopt a similar

of training program for their lecturers, and at the end of the day are subject matter experts who deliver training/lectures/tutorials. Like universtities, Industry based qualifications are based around Industry specialists and it is the skill of the professional in terms of subject expertise and not necessarily the trainer qualification .

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

As an organisation we have not put TAE on scope as we believe the principal should be your trainers are trained outside the organisation. Again it is the quality of delivery and not the number that is the real issue. Ethically we believe that our trainers should be trained in the delivery of their subject matter expertise. We have seen examples of rubber stamping without real rigour.However the resources of organisations are constrained and the provision of training qualifications is, in the case of the HWNS, not seen as a necessary core competence for the organisation which has significant training commitments in terms of disability services..

- 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?

We agree with the principle of recognition of prior learning but a process needs to ensure that the process is valid. The development of trainer education/skills has had an interesting path, from the business package through the TAA to the TAE and now with the adding of language and literacy we move further and further away from the quality of delivery and more into the realm of restrictive practice.

  – 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?

We note that the Western Sydney University has been providing skill training for their lecturers, who at the end of the day are subject matter and content experts. The people delivering this program are recognised by their ability to educate their students in their area of expertise but also because they are people who get great results and ensure that the learning environment is of quality. 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?

The principles of adult education need to be viewed in a broader context and scaffolded to support multiple learning contexts. For example, it is our understanding that there are people already with higher education qualifications who are also trainers. We note that the majority of trainers at HWNS are workplace based and refer to the Singapore model and the fact that a number of universities already offer qualifications in adult education which in the first instance don't allow these people to deliver training without their TAE.

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

In a number of universities, where a practicum takes place for subject matter experts (e.g.someone holding a science degree) in the completion of their diploma of education up to 6 weeks is required.

Yes a practicum is a good idea but its length should be directly related to the length of programs and the relationship between skills and the theoretical framework underpinning those skills.

The context where basic understanding of skills training is extremely broad and therefore flexibility, rather than restrictive practices, need to be applied.

- 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?

Employment history and abilityto deliver skill training are two different issues. In principle a demonstrated history should be the basis under which the program delivery are required.

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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:

Outlined below is a cut-and-paste of the Singapore system. It has a variety of levels that relate directly to the skills required for trainers. This systemprovides the flexibility required by organisations such as HWNS..

This is a direct cut-and-paste from the WDA website.
http://www.wda.gov.sg/content/wdawebsite/L207-AboutWSQ/L301-WSQIndustryFramework-TrainingandAdultEducation/L401-013TrainingandAdultEducation.html

Workplace Trainer Programme

Programme Objectives:

The WSQ Workplace Trainer Programme (WTP) is designed specifically for workplace supervisors, line-leaders and managers who also perform the role of a trainer. It aims to equip them with the competence to effectively deliver workplace training and conduct assessment at their workplaces.

Duration: 2 months (approximately 47 contact hours)

Suggested Entry Requirements:

- Performs the role of a workplace trainer
- Employer-sponsored where employer allows for workplace training opportunities
- Effective verbal and written communication skills in English, employee to possess workplace literacy skills at the proficiency level equivalent to WPLN level 4

Modules:

WTP requires learners to complete two modules.

- WP1: Facilitate Workplace Learning
- WP2: Assess Competence

WSQ Advanced Certificate in Training and Assessment

Qualification Objectives:

The Advanced Certificate in Training and Assessment (ACTA) is designed to provide learners with the essential skills and knowledge to deliver training and assessment across different industries. Delivered as an integrated curriculum, and emphasising on peer learning, use of technology, reflective practice and continuous professional development, ACTA is suitable for professional adult educators who wish to develop their knowledge and skills in competency-based training and assessment.

Duration: 3.5 months (approximately 103 contact hours)

Suggested Entry Requirements:

- Effective verbal and written communication skills in English
- Keen interest to facilitate learning and assess adult learners in an array of learning settings
- Possess appropriate level subject matter specialisation and industry experience, relevant for design, facilitation and assessment of learning
- Possess basic Information and Communication Technology (ICT) skills
- Able to source and analyse relevant materials from various avenues for design and development of learning resources

Modules:

 ACTA requires learners to complete six modules and is delivered as an integrated curriculum (cohort intake).

- M1: Apply Adult Learning Principles in Training
- M2: Design a Learning Experience
- M3: Prepare and Facilitate a Learning Experience
- M4: Interpret the Singapore Workforce Skills Qualifications System
- M5: Assess Competence
- M6: Prepare for Continuing Professional Development

WSQ Diploma in Adult and Continuing Education

Qualification Objectives:

The Diploma in Adult and Continuing Education (DACE) is designed for practising adult educators, and is a qualification requirement for Curriculum Developers for WSQ Approved Training Organisations (ATOs).

Duration: 12 months (Approximately 236 – 243 contact hours)

Suggested Entry Requirements:

- Effective verbal and written communication skills in English
- Strong analytical skills
- Strong presentation skills
- Good IT and research skills

- Completed WSQ Advanced Certificate in Training and Assessment (ACTA)
- Secured a Practicum Host Organisation (PHO) to facilitate learners to conduct training needs analysis, evaluate needs and develop courseware as recommended from the analysis.

Modules:

DACE requires learners to complete all 5 core modules, an elective track of up to two elective modules, and an Integrated Practicum.

Core:

- CM1: Develop Practice Through Reflection (1)
- CM2: Review Competency- Based Training Approaches for Adult Workers (2)
- CM3: Conduct a Training Needs Analysis (2)
- CM4: Develop Curriculum and Instruction for Adult Learning Programme (7)
- CM5: Develop and Review Competency-based Assessment (4)

Elective Tracks and Electives:

- Assessment and Evaluation
  - o EM1: Develop Assessment Tools (3)
  - o EM2: Evaluate an Adult Learning Programme (3)
- E-Learning
  - o EM3: Design and Develop an e-Learning Programme (6)
- Workplace Learning and Training
  - o EM4: Develop a Workplace Learning Plan (3)
  - o EM5: Develop an On-the-Job Training Programme (3)

WSQ Specialist Diploma in Advanced Facilitation

Qualification Objectives:

The Specialist Diploma in Advanced Facilitation (SDAF) builds on the foundation of Adult Educators (AEs) competencies covered in the WSQ ACTA, which enables practitioners to hone their capabilities needed to facilitate learning and development using blended learning approaches, to enable sustained learning and positive change.

Duration: 7 months (Approximately 158 contact hours)

Suggested Entry Requirements:

- Completed any version of ACTA or DACE or equivalent
- Experienced and active Adult Educator with facilitated training experience from the last 3 years
- Secured a Practicum Host Organisation (PHO) to allow learner to conduct a scoping session to design and deliver a facilitated session

- Effective verbal and written communication skills in English
- Good knowledge on technology and reasonable mastery of ICT skills

Modules:

SDAF requires learners to complete 4 modules and a practicum component.

- AF1(A) & (B): Facilitate Mindset Shifts for Impactful Change (5)
- AF2: Use Blended Learning to Deliver Effective Learning Facilitation (5)
- AF3: Use Process Facilitation to Achieve Desired Group Outcomes (3)
- AF4: Brand Yourself for Professional Success in a Digital Age (3)
- Practicum

- 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?

Community of practice

HWNS deliver a significant amount of 'training' to both internal and external stakeholders across the organisation and beyond. One of the issues with this is the ability of the organisation to be able to meet its regulatory requirements with respect to accredited training and to ensure that all training content and delivery is of a consistently high standard. This situation is made more difficult by the regional nature of both the organisation and the training delivered. There is a need to ensure that all staff who conduct training with either internal or external stakeholders on behalf of the organisation are delivering such training in accordance with the necessary standard.

There is also a need to recognise the expertise of staff involved in training activities throughout the organisation as these staff are usually employed in roles other than full time training, have highly valuable skill sets and a willingness to share those skills sets with others.

Further as identified in our recent ASQA audit we need to establish a methodology to ensure we monitor workplace personnel's contribution to the delivery of training and assessment is monitored by the organisation.

As a result of this the HWNS is in the process of developing a community of practice. Outlined below are some of the principles that were using in the development of such a professional development organisation. Such a community we believe would be valuable to both the Australian government and the VET workforce in ensuring that the professionalism of trainers is maintained.
Of concern is the ability of such an association to be hijacked into other areas of concern e.g. acting as a union in wage negotiations.

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

Establishing another layer of bureaucracy and inflexibility for the training organisation

It is important to acknowledge the role of employers and industry in establishing such an association. Experience over the period of time,for example Industry Skills Councils have shown that the focus on outcomes can easily be replaced by bureaucracy.

In the same way if the organisation is funded by government and not necessarily by the individuals, the organisation will answer to government and not to the training needs of employers.

This will establish another layer of inflexibility for the non-profit training organisations. Particularly in the non-profit arena the reduction of bureaucracy is aprime focus of the current body monitoring the governance of non-profits, the Australian Charities and Nonprofit Commission (ACNC)

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

The following is suggested as providing both a professional framework, yet the flexibility for employers.

1. Establishment of Community of Practice (COP);
2. All members of the COP will provided with documentation to certify their membership;
3. Members will be provided with a number of professional development activities throughout each calendar year; as a point system
4. Membership of the COP is open to all qualified trainers who meet the minimum requirements set out in the membership document;(to be established)
5. Membership of the COP is mandatory for all trainers delivering or assessing formal training activities to both internal and external stakeholders on behalf of RTOs .

Proceeding in this manner will ensure that all trainers who wish to undertake the delivery of training activities on behalf of RTO's or other training organisations are formerly recognised for their efforts. It will allow government to better meet its regulatory requirements around the delivery and assessment of training activities.

- 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:

The below roles and responsibilities are based on the community of practice being established by HWNS

Roles and Responsibilities of the Community of Practice

All training developed and delivered by RTOs to either internal or external stakeholders will fall into one of the following four categories;

- Accreditied Training: Any Qualification, course, skill set or unit of competency that forms part of the scope of registration for the RTO;

- Professional Development Activity: Any internally provided course or program or activity which is part of the ongoing training program provided to staff and volunteers as part of their employment with RTO and for which RTO is required to provide evidence of successful completion of such training;

- Enterprise Training: Any course or program provided to external parties by staff or volunteers on behalf of RTO, where RTO is required to provide evidence of successful completion of such training; and

- Learning Activity: any course, program, workshop or activity delivered to external stakeholders on behalf of RTO, where that course, program, workshop or activity is not RTO training, a Professional Development Activity or Enterprise Training.

All trainers and assessors will receive a Responsibility Statement which outlines the duties and responsibilities specific to their role and the training or assessment activities and programs in which they are involved.

As stated there is a need within RTOs, both in terms of legislation and for business reasons to ensure that training delivered by trainers to either internal or external stakeholders is both consistent across the state and of the highest possible quality. This is of particular importance with respect to any accredited training delivered or assessed on by RTO. Given the new legislative requirements surrounding consistency and quality of training and assessment by the new national regulator ASQA, RTOs needs to ensure its ability to show that it has taken steps to achieve the highest levels of consistency and quality.

This COP approach has worked well in a number of other organisations, most notably within UnitingCare Community(UCC) in Queensland. The reason that the UCC experience is worth considering is that as an organisation with its own internal RTO, has a similar geographically dispersed workforce and when E&T's volunteer component is included a similar sized workforce.

Our research shows that in recent years UCC has faced difficulties with respect to the consistency of the training of its staff across the state and its ability to deliver this training where needed. There were a number of issues which caused this

1. Training conducted across a large number of geographically diverse locations;
2. Inability to have trainers released from normal duties to conduct training or assessment activities;
3. No cohesive network for trainers and assessors to access in order to discuss issues with respect to content and delivery;
4. No centralised repository of training resources, leading to an inability to control the content which was being presented; and
5. Lack of rigour with respect to consistency of delivery and assessment of material, leading to inconsistencies around levels of competence of participants.

The HWNS comments on this model are as follows.
Whilst HWNS already possess quite a strong learning culture amongst its staff, we need to continue to build this as a means of increasing staff satisfaction and retention rates, ensuring that our staff are as well trained as possible so that they can provide the highest levels of service to our clients, whether they be internal or external and to meet the wide range of legislative requirements we work within.

Further to this one of the central aims isto ensure that the various business functions of HWNS has confidence in the quality and value of the training being provided. Having training delivered by a person who was a COP member builds organistionalconfidence in the quality of the training delivered. This issue is critical for E&T. We mustensure that our internal stakeholders throughout the multipleregions and business units have confidence in not only in the quality of the training being delivered, but also in the value of credible internal trainers..

As a provider of training and assessment activities to external stakeholders, such as Government and a number of major private organisations as well as other not for profits, HWNS need to be able to assure these stakeholders of our reputation for the consistency and quality of our training.

This can only be achieved with a flexible system that allows HWNSto control the quality of the accreditation process.

TheHWNS COP isbuilt around similar ideas to UCC, in particular the idea that membership of the COP was not limited simply to those people who delivered RTO accredited training, but to all interested.

This development of a community of trainers and assessors allows for;

1. Trainers and assessors not to feel isolated, but rather supported in their endeavours;
2. Increases knowledge exchange, to ensure the best ideas and innovations are included in our training no matter where they are developed;
3. Allows Trainers and assessors to obtain feedback, compare notes, develop their skills through informal networks as well as through formal Professional Development activities; and
4. Provides recognition of the value that these staff provide to E&T as an organisation.

- 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?

The advantage of a national system is to develop consistency of training levels and capabilities across all jurisdictions.

Of concern generally is the fact that we now have consistent national training products, consistent standards, we would then have consistent training qualifications and levels. The ability to provide a point of difference for registered training organisations would disappear sincein reality they would all be the same.

In the school education system we all acknowledge that some schools are better than others, in universities we acknowledge that certain universities provide a better quality product and attract better students than others . We need to ensure that we don't have the same level in all organisations as a result of suggested changes across the board.

In an audit by ask what of HWNS we found that the auditors were more worried about the qualification and meeting the minimal levels, which they acknowledged we exceeded but felt the training was about the qualification and not the fact that these people were trained to reach the standards required to support people with disabilities.

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

To our knowledge there are no organisations that could fulfil the role.

5.   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:

- 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?

HWNS would suggest mode B as it fits with our concept of the community of practice. Model A appears to be a model based on governance and quality and ignores professional development. Model C from commencement would become a subset or junior partner in the the teacher registration system.

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

See our comments on the community of practice

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

The disability sector has established a community of professionals.

National Disability Practitioners

Working for Disability Professionals

National Disability Practitioners (NDP) focusses on supporting, developing and connecting those working in the disability sector.

Members are more equipped, informed and appreciated – ready to thrive in a challenging and rewarding professional environment.

NDP provides the resources and opportunities to enrich the careers of members, create community and further strengthen the Australian disability sector.

Such an organisation forms a model for VET

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

The NDP as identified above is a voluntary organisation but a majority of disability organisations paid the initial membership fees to ensure the success of the organisation. A similar methodology for such an organisation perhaps even based around sector/industry guidelines would be enough to attract the majority of trainers.

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

In terms of capability frameworks we again point towards the Singapore model that has for its trainers various capabilities. The advantage of such a model is we no longer have one size trainer fits all but a variety of trainers operating at different levels in different sectors being able to communicatein multiple contexts .

- 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?

At HWNS we have implemented an education and training advisory committee which meets quarterly to examine and advise the RTO on the following

1. Ensure connectivity between HWNS & Industry with HWNS Education & training.
2. Endorse a HWNS Education & Training framework that promotes a Learning culture with HWNS & Industry.
3. Provide Industry intelligence to HWNS Education & Training on training needs and employment issues.
4. Review of HWNS Education & Training ensuring
   a. Resources, ensuring they meet the needs of Industry & HWNS
   b. Program delivery meets the need of Industry & HWNS
5. Endorse Pathways & Learning strategies for employees of HWNS to be used in career growth

By having such a committee we are able to identify training needs and at the same time the skills required by our trainers

- 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?

Such a committee gives our organisation the confidence in our training delivery, and with this mixed with our community of practice we believe our 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?

By concentrating on the negativity and failure of a minority this initiative will become locked in administration and compliance and lose the true opportunity of improving delivery methodologies skills of the trainers. At the end of the day it is essential to provide traineeswho have the skills not only to gain employment but to build their career due to the strong link betweenindustry and a high qualityproduct delivered inthe VET sector..

8.	Discussion questions – the role of industry in assessment:

- What role should industry, for example, employers and industry organisations, play in validation of assessment? Does the varied interpretation of 'industry' inhibit a proper appreciation of the topic and should it be defined? If so, who would best define 'industry' when considering the practice of validating assessment?

- Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved?

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

- How can we ensure engagement with industry is appropriately targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?

COMMENT:

- 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?

There are two factors/history that should be considered.

1 Queensland as part of its original auditing process for RTO's would invite the appropriate ITABs to participate. This meant that the audit looked at two factors the system and the quality of the assessments that were being conducted given the I tab people were subject matter experts on that particular package.

2 As indicated above HWNS has implemented a number of strategies to ensure that our training and assessment meets the needs of the disability sector. Additionally we have joined a group coordinated by the Community Service ITAB in New South Wales which focuses on validation.

- 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?

Yes see comments above

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

As anindustry sector (community services) RTO we worked closely with the Community Services and Health Industry Skills Council which is now been removed. The capacity to link with industry was there, buthas been lost.

- 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?

The Australian Industry Skills Council is a good start.

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

  - 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?

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- 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?

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?

  – 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:

- 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?

No, because of the poor standards of a small number of commercial RTO's the rest of the industry is having to pay. Is been suggested to our RTO recently that we need to spend 20% of our revenue on compliance. Any suggestion of an increase will ensure not only a movement of RTO's away from accredited training but also employers away from programs due to the complexity that they have to deal with in terms of meeting RTO compliance.

- 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?

Today we live in a world of technology. Mid-2015 the HWNS a decision was made to scan and copy all assessments for all students onto our AVETmiss system(VET track). This is an ongoing practice and is presented a number of difficulties but in the end the assessment for each student will be recorded.

- 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?

Assessment outputs can be gauged by industry's acceptance of the quality of the product produced by the RTO. In the case of universities I would use the example of medicine where doctors from some universities are acknowledged to be better practitioners than others.
The introduction of another regulator is not the answer.

- 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?

In terms of adding additional mechanisms to the framework, HWNS would suggest a moratorium on change for at least five years and a longitudinal study carried out to determine whether or not in actuality the framework is successful.

It is our opinion that the failing and quick returns of a few are the primary reason that honest capable RTO's are paying the price for continuous change.

In reality the Regulator, Industry, employers and even local RTO's know who these providers are yet little action is taken against them but the Standards raised for everybody else.

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:

More regulation does not necessarily mean higher quality. Assessment and the measurement of outcomes have been going through continuous change over the past 10 years. Accredited training packages have been changing, the move to ASQA and training qualification continue to change and so it is difficult for trainers and RTOs to stay on top of change and still do the job required by Industry.

 There needs to be a time of consolidation. It seems strange that as an industry we know the providers who need special attention yet we change the whole to find the few. Theses organisation on paer do the right thing but under the surface they provide cheap qualification and bring the industry down.

We know of RTOs that deliver programs in a short period of time and yet they achieve great outcomes (all pass) and some bureaucracy thinks this is a great outcome.

More control is not the single answer .

The HWNS has established a COP framework presented here which has the capacity to assure the quality of training for this organisation in multiple contexts.

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?

This is difficult to answer. Is occurred over many years in schools, TAFE colleges and universities.

At the very grassroots level what has been done in schools firstly to improve the level of language and literacy of students and the skills of their teachers.

This is a systemwide issue that should not focus on the VET sector.

- 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?

See comments above.

- 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?

See comments above

- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

This is opening Pandora's box