



## 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](mailto: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:  

Krista Peterson
Katrina Gilligan
3. Organisation (if applicable): 

Katrinass School of Hair and Beauty
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4. Please indicate your interest in this discussion paper: 

RTO and Industry Representative
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(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:

We do not feel that necessarily restricting the number of RTO's allowed to deliver the TAE qualification or skills set is the answer. More focus should be placed on the monitoring of those that do deliver it for quality, placing them under scrutiny and if to be found non-compliant then removing their ability to deliver the TAE qualification or skill set. Only allowing a number of RTO's the ability to deliver the TAE qualification or skill set disadvantages any current or new RTO's from expansion.

Provided RTO's issue the TAE or skills sets in an ethical manner then no they shouldn't be restricted from issuing these to their own trainers and assessors. In many cases it is a financial advantage if you can train and upskill your own staff.

We believe that if this question has been raised that the rigour of the RPL process for TAE qualifications and skill sets is questionable. Again if the process is undertaken in an ethical manner, people should be able to use RPL as a means for gaining this qualification. Particularly teachers who are university qualified, with a Bachelor of Education looking to attain a lower level qualification, although equally important and valid, like the TAE.

Yes, the TAE qualification should only be delivered by VET practitioners who have experience within the VET sector. The question has been raised about quality assessment and training and those that deliver the training to the 'trainers' are to be treated no differently.

We do not feel that they should necessarily hold a university-level or higher-level VET qualification to deliver the TAE.

## 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:

The TAE Certificate IV should include a core unit dedicated to the design and development of assessment tools. The potential improvement in the outcomes for the students will include assessors with a wider range of understanding for the assessment tools being used and the ways in which they have been designed or developed. It allows trainers and assessors to in the future contribute positively to the improvement of assessment tools within their training workplace.

If industry validation of the current core unit for *TAEASS502B Design and develop assessment tools* unit has been undertaken and no need for a change is required, ie: developing a new unit than don't waste time on that aspect. Look at ensuring that the delivery of the current unit is being done well, poor student assessment outcomes is not indicative of the units that the trainers and assessors have learnt in their TAE but rather on their training abilities themselves.

No this unit should not only be restricted to diploma level, it is a unit with foundation skills that as a "new entrant" into the training and assessing scene needs to be studied. If that much weight is being placed on the importance of this unit and improving assessment outcomes for students then I would expect the absolute minimum that a trainer and assessor can have would be a Certificate level for TAE.

Decision makers should always give strong weight to a combination of key stakeholders, the industry and anyone else who has arguments, including analysing the nature of their arguments and the underlying reason for their arguments.

### 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:**

Yes, we believe there should be a professional association for Australia's VET system and they should have in place the capability to assist in the development of professional skills for the VET workforce. The Australian government who are assessing the quality of assessment currently in VET remain responsible for ensuring the viability of the VET sector for continued training and growth for the employment sector of Australia. They should actively support a VET professional association.

The barriers will be the introduction of the association, will it be compulsory to as a trainer and assessor be part of this association? How to enforce the compliance of this if so and the future monitoring of the association and its effectiveness, lastly the cost involved, how much will this be? Is membership yearly or more?

The purpose of the association should be to really help with trainer and assessor development and accountability for their positions. They hold a position that is equally valid as a school teacher, this is the delivering of information for educational purposes and failure to have good quality trainers and assessors impacts negatively on the students.

#### 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:

Yes, if the below were not the activities they would be responsible for implementing, what is the exact purpose of having a national professional association?

- coordinate, approve or design professional development programs
- develop capability frameworks and put in place monitoring programs
- 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?

These activities should be at national level allowing for consistency across all states and across the VET sector.

Currently organisations like ACPET or VELG devier components of these, however, it is not a requirement RTOs be a member of these and does not necessarily place any accountability on the trainers and assessors themselves for their own development in the VET industry.

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

- Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A,B or C?
- What value would a VET professional association, or associations, add to the VET sector?
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

### **COMMENT:**

Model C could be the most beneficial as the work as already been significantly done and would be a branch out into the VET sector.

A VET professional association may add to the crediability of the VET sector. However, if it is only being suggested to create jobs that are not necessary, waste time, money or only implemented as a band aid option it will further devalue the VET sector.

Membership fees will be important, teachers are responsible for their own registration fees and as such trainers and assessors should be also. To be employable registration is a requirement. They will be tax deductible also and registration periods should be over a couple of years, however, they must abide by annual requirements, eg: a certain amount of PD completed in the year. This PD as an example could be anything, training development, industry engagement etc.

If it is going to be implemented it should be mandatory, no point in making it voluntary as it does not lead to trainer and assessor accountability if some do not have to adhere to the association requirements.

## 6. Discussion questions – capability frameworks:

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?
  - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

### **COMMENT:**

The capability of a trainer and assessor is very important, however, how the frameworks have been developed and by whom will be the most important aspect. All VET sectors are different in the expertise and specialist skills required and if someone with no real understanding or knowledge of one VET sector has contributed to the development of said skills they do not reflect truthfully what is required of a trainer and assessor. There is room to use the frameworks as guides to capability requirements for trainers and assessors, however, the above remains an area of caution.

## 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:

There have been many approaches offered for the engagement of the industry for validation, however, not specifically outside of this perimeter and in relation to the conducting of assessment. Industry engagement with the conducting of assessment would require them to be trained specifically in that particular RTO's assessments and their policies and procedures. They would also be required to hold the relevant skills set for training and assessing if they were to have a direct say or impact on an assessment outcome for a student.

Who would be responsible for determining the industry-endorsed test? Would what one test fit all RTO's delivering that competency? And if the student outcomes are no different or worse who is held accountable and responsible, especially if the industry-endorsed test has been administered correctly and in accordance with all instructions given. Is there room for trainer and assessor interpretation to skew the industry-endorsed test and therefore skew the student outcomes? What would the standardised test look like and how would that impact on the RTO's training methods, this could impact on RTO differentiation.

If all components of the course have been met successfully no additional testing prior to receiving the qualification should be necessary, this question insinuates that the level of training in preparation for undertaking assessments is of a low level and again as mentioned in this response should be a key focus – trainers who know how to train and prepare students for assessments.

We are not opposed to the notion of a standardised test as essentially whatever is taught from one RTO to the other should allow students to confidently sit a standardised industry test, however, it must be explore the way in which this has worked or not worked within our other educational institutes – NAPLAN – the pressure on students to succeed and the pressure this has placed on

schools for 'outcomes' has defeated its purpose as we have seen the extent schools will go to in order to get 'good' outcomes/results.

## 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:

Industry should help to determine what the 'industry' is looking for in terms of the skills and knowledge of the graduates. They are in the industry and understand what the customers, clients etc are looking for, they understand the passion that graduates need to have and can advise on how this needs to be instilled into the delivery of training and the assessments. It is important that people understand experience can not be trained this comes with employment after training and those that are offering industry engagement can not expect graduates to have the same experience as someone with 12 years in the industry.

The word 'industry' is open for interpretation as not everyone engaged in 'industry' consultation is going to be the best to advise or give opinions on the above, however, defining 'industry' down too much may make it difficult to engage with them as it may limit the availability of what is considered an appropriate 'industry' person to engage with.

Potentially industry groups and employers may have skills for validating assessments, however, they will still and do require support when undertaking this process. To engage industry and employers is time consuming and often the main reason for the industry not wanting to be involved, other reasons include a perceived competitive nature between RTO's who are also in the industry as well and not wanting to reveal industry secrets or how they operate their business.

It shouldn't be a requirement that industry do build on their capacity and capability for training and assessment, however, if industry engagement is to be considered of such high importance and for it to be effective for the increase in not only student outcomes but their training in general then they will need to be able to have the capacity and capability to be involved. However, who is responsible for ensuring they do and how will they do it? Time, cost and other things come into play. Is this an extra burden for the industry themselves.

This is a difficult question to answer as some industries are limited in who they have available for engagement with or even location makes it difficult. Maybe more industry engagement is undertaken at the first level of the chain – the development of the training package where the assessment requirements are developed and finding a way to use these people as well for future validation with RTO's. This will then allow for feedback for the development and improvement of the training packages.

It is also important to note that RTO'S are regulated to a high degree now – when specifically looking at the outcomes, as previously mentioned the outcomes will only be as good as the training. If RTO's are bogged down by regulations upon regulations where is the time to train? Where is the time to ensure good quality, industry relevant, student satisfying training to come from? The focus should be on the training!

## 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:

It is a requirement that validation take place as it is, and each RTO will already be implementing ways to achieve this so that it best suits their own competencies and avoids a 'one size fits all' approach, however, more focus needs to be put on the use of the validation and how that impacts on the development of the RTO's delivery of training and assessment.

If a learner is incorrectly deemed competent, it is not necessarily going to change the future outcomes for other students by having external assessment by the industry as it comes down to the actual assessment item itself. There is no time allowance for external assessment to be conducted by industry and some RTO's will be limited on who is available to them for this.

If an RTO is not found to be at risk of public safety, they don't fit the criteria for an RTO profile that would require independent validation and the same for student cohort, would they not need to undertake independent validation? Is this approach more of a reactive approach, wait until the RTO becomes a risk in some form and then make them validate – does not serve to improve the quality of assessment – which is the apparent point of this paper, despite the more pressing issue being the training of the graduates.

- Should high-risk student cohorts be required to undergo independent reassessment of industry-agreed sets of competencies before being issued with their qualifications? – no – what is the point in having trained assessors to do this within the RTO itself? Suggesting this does not serve to put any trust into the RTO itself nor the assessor. Again who decides on the industry-agreed sets of competencies?
  - 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. – if there is high levels of non-compliance being found – why is that RTO not being looked into at a deeper level? The minority should not determine what the majority will need to do.
- 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? – the burden would be too great in terms of cost and time, who pays for this and where is it conducted?
- Who would be most appropriate to oversee the reassessment of qualifications? Good question and who would also hold them accountable?
  - For example, could existing regulators or other organisations (such as firms that specialise in assessing students) take on this role? – how much would this cost and again the RTO responsible for the initial delivery of this training and assessment should be looked at further.

## 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 this not considered when a training package is created? This would be where this should be taking place, as the training package is ultimately the tool that guides RTO’s in the development and implantation of their training, followed by the development and implantation of their assessment. If student outcomes are falling short when these are followed perfectly then the training packages, who develops them and how they are developed needs reviewing.

## 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:

Having RTO's retain all assessment samples for a longer period of time may or may not improve the quality of the assessment. The extra time to hold onto assessments needs outlining. This will only be beneficial if the assessments are used in the future, holding them in a box for longer but not doing anything with them will not improve the quality of the assessment. It is also more of a reactive approach as well, if there is deemed to be an issue with a current assessment and it is the same assessment from some time ago – there has been a problem for too long and should have been addressed earlier.

Everything will come with a cost, it is the nature of business, nothing can be done for free, ASQA is the regulator that would best be suited to this and the cost could be built into registration fees.

Poor assessment development or poor assessment outcome? Poor assessment development comes down to the RTO developing the assessment, however, poor assessment outcome down to the training. Having training-only RTOs recognised as a formal part of the regulatory framework will not necessarily increase assessment outcome – if the training is poor the assessment outcome is inevitably going to be poor also.

## 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:**

These are questions that once more detail and decisions about assessment outcomes is decided can be discussed.

### 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?

It is very dependent on whether the fault lay with the student who has simply forgotten how to do their job correctly, has a complete lack of care and causes injury or does the fault lay with the training provider who provided the training and assessment which was not to the standard or quality required. This will very quickly become a blame game and how long after when something happens in regards to public safety could the training provider be held accountable?

Not necessarily for the reassessment, it may come down to lack of training in which case they are not prepared to undertake a reassessment anyway.

In terms of income support eligibility and if qualifications are cancelled or recalled I don't think they should have their income support looked at as during that period of time they met the criteria for income support.