

SUBMISSION

To

The Department of Education and Training

ON

The quality of assessment in vocational education and
training– Discussion Paper

Author

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Discussion questions addressed:

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Submission details

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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)
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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:

In addressing the question “*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*”?

The discussion paper raises the issue of where TAE qualifications are delivered and assessed by those that lack expertise in the VET area. It must be borne in mind that knowledge taken away by the learner from such a session will be acted on by the learner. Should the learner receive knowledge from an uninformed source then we will, in all likelihood, see tasks performed at a substandard level, needing to be corrected at some future time by a teacher with the requisite ability. In turn leading to financial losses and time wasted which cannot be recovered. All of this points to a weakness in our training system.

Learning, be it through the avenue of training in a vocational education & training establishment, or formal education such as university, is best achieved when the trainer/teacher possesses expertise in the area being delivered. This expertise comes after time and experience in an industry. In the delivery of VET qualifications, this equates to trainers and teachers that have been in the VET industry for a lengthy period. They are better placed to share the nuances and better practices that

are learnt with time in industry, along with the insights gained from their own professional development.

To learn about automotive brakes; accounting principles or Language, Literacy and Numeracy, learners need to learn from those that may be seen as experienced practitioners of the area under study. Learning from an experienced person, ensures that knowledge gained through experience in industry is shared with those undergoing training. In turn, those undergoing the training gain insight into the better practice from the lessons learned. The result of this approach, In the case of the TAE, is a practitioner that is better prepared to deliver meaningful training.

In conclusion, the education and training of our workforce is central to the economic wellbeing of our nation. In holding a TAE qualification, we assume that the individual has attained a certain level of technical expertise in the delivery of training. To improve the delivery of training, we need to learn from those that can make the subject matter accessible and relevant. This can only occur where the trainer/teacher has experienced the many dynamic circumstances that occur daily in the VET sector. This in turn creates individuals that are better equipped to deliver meaningful learning.

Recommendation: That all TAE qualifications and skill sets be delivered by individuals who can demonstrate a specific period of training and/or assessing employment history in the VET sector.

In addressing the question ***“Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?”***

This is critical to the quality of our vocational education and training.

The TAE Cert IV and Diploma are entry level qualifications to teaching and training. While individuals may be highly experienced in their area of industry, the imparting of skills and understanding to another, is a specialised field of study. As is well acknowledged and accepted in literature, all learners are individuals and possess different ways of learning. To enable the learner to acquire new skills, the teacher /trainer must be equipped with a sound understanding of different learning styles. Be able to recognize these, and adapt their delivery to accommodate the various learning styles sitting in their instructional area. These skills, in identifying different learning styles, come with the acquisition of knowledge, and the practical application of that knowledge in the learning environment. The end result of this is a higher degree of learning success in any cohort of learners.

Any practical component should be taken over a 12 month period and be in 2 parts.

Part 1 would concentrate on the preparation for the delivery of training. This would look at lesson plans, time management and what resources are to be used. Strategy to be used, and linkages with training packages and competencies.

Part 2 of the practical would be a capstone and would entail a lesson/ training session observation by 2 to 3 assessors with one being an industry expert in the area being delivered. This assessment for the entry level qualification would focus on lesson delivery and student engagement, the relevance of subject matter, the identifying of various learning styles and lesson structure.

In conclusion, this practical element of the TAE would be better served if it is conducted by an independent body, such as a professional VET association. The choice of allowing RTO's to use in-house assessors to form the bulk of part 2 of the practical assessment, would open the door to compromised training/teaching standards. There may be an argument for one of the assessors to be from the RTO to maintain a level of professionalism expected by the RTO. However, an independent VET professional body would and should encompass a level of professionalism that is expected from a national perspective.

Recommendation: That TAE Certificate IV and Diploma be required to complete a practical component . That this component be in 2 parts and be completed over a 12 month period and organised and conducted through an independent VET professional body.

In addressing the question ***“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 delivery of effective adult education and training is essential to the nation's productivity and its competitive edge.

The ongoing professional development of Vocational Education and Training practitioners is central to the above. The current mindset of RTO's appears to be that all that is required to teach/train someone a competency is a TAE Cert IV. While it is an ASQA requirement that holders of the TAE Cert IV undergo continual professional development. The reality is that apart from a small number of RTO's, there is often no encouragement for the individual to go onto further studies with a focus on deepening and improving their adult teacher/training skills.

Upon entering the VET sector, the new trainer/teacher brings a certain level of expertise of the industry that they are a part of. Subjectively, this experience is one of the compelling reasons why the individual was recruited. The person must hold a Certificate IV in TAE. The person then enters the VET sector and their focus is on being prepared for the delivery of training. My observation over a period of time is that they become very knowledgeable in their area of industry expertise, but they lack the ability to deliver meaningful training/learning across a range of students. The problem is not their industry knowledge; it is an inability to adapt to changing classroom dynamics due to a failure to engage in ongoing teacher/trainer professional development.

The Certificate IV provides an elementary level of knowledge and ability in how to deliver a lesson to a class of people. Ideally, a holder of a Cert IV TAE would deliver training/teaching to an entry level class. This is not what occurs. Based on their industry knowledge, Cert IV TAE's are engaged in training to an advanced level of student, Stage 3 apprentices as an example. Should the class be disengaged due to the ability of the trainer/teacher to deliver in a manner that engages them, then this can, and does result in an entire cohort that has a low success rate.

Experience has shown that where a teacher/trainer has engaged in ongoing professional development in the VET sector, their ability to deliver meaningful training/teaching is enhanced. Research conducted by various large VET providers has demonstrated that where TAE Cert IV trainers/teachers undergo ongoing professional development, they are better equipped to meet the

challenges faced in the classroom and are more likely to remain and make a positive contribution to VET.

Ongoing professional development that moves towards a university level VET qualification, will ensure that the delivery of training/learning is delivered by people that have a delivery method commensurate with student ability and expectations.

Recommendation:

That it be a requirement that all VET Certificate IV and Diploma level VET practitioners/professionals undergo continued professional development in the delivery of training/teaching. And that this is in the form of moving towards completing university level qualifications.

In addressing the question “***Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?***”

Under no circumstance should RTO’s be permitted to issue TAE qualifications to their own trainers or assessors. In allowing this to occur, there is an unacceptable element of risk to the quality of trainers being issued a qualification. We have witnessed over recent times the lengths that some RTO’s will go to in issuing trade certifications to individuals that are worthless to industry. By extension, this practice, no matter how well it is policed, will encourage unethical practices to be followed.

Training in any TAE qualification may be provided by any RTO, but to maintain the integrity of the system they must not be allowed to issue TAE qualifications to their own trainers and assessors which then permits them to deliver training in their own establishment. This problem may be overcome with the advent of a VET professional association that issues a practicing licence/certificate to a holders of a VET TAE qualification.

An independent professional VET association would be better placed to license/register an individual to practice in the VET sector. This model would be in line with issuing authorities such as the Legal Practitioners Admission Board of NSW, which admits individuals to the legal practice within NSW; is independent from university’s that issue legal degrees, and provides avenues for professional development. It is also imperative that there be some mechanism that requires continual professional development in the delivery of learning/training in order to maintain currency.

It is my opinion, that this model would better serve the interests of the VET industry, and the national interest in maintaining integrity and providing a high quality TAE qualification.

Recommendation:

That TAE trainers/teachers, once they have obtained their TAE qualification, be required to obtain a license/registration to train/teach and this be through the avenue of an independent professional VET association.

2. Discussion questions – skills and qualifications 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:

In answer to the question ***“Is there a need to establish a national professional association for Australia's VET system?”***

I agree with the sentiments expressed in the discussion paper that teachers occupy a position of trust in the community. VET practitioners also occupy a position of trust in the community, albeit different to K12 teachers. VET teachers are responsible for the provision of skills and abilities to provide adults, upon leaving school, with the skills necessary for them to earn a living and create a meaningful life. They also provide the nation with the skilled work force necessary for the nation to compete, and earn its way in a dynamic world. These skills are not learned in either Primary nor High School, but in adult education.

Upon entering the VET training environment, an individual is exposed to two separate but related elements. One is the industry experience of the practitioner, the other is the ability of the practitioner to impart the required training in a manner that is accessible to the individual. As discussed earlier, practitioners spend a good amount of their time researching and staying current with developments in their field of industry expertise. Through this process they stay current with their industry practices and increase their industry knowledge. This is very good for learners, they get to learn of the latest industry initiatives. However, there is very little further study, or professional development of the teachers ability as VET practitioners. While the current RTO mindset prevails, that all that is required to train/teach is a TAE certificate IV, there will be no incentive to improve their ability to deliver meaningful learning.

I believe that there is a need to establish a national professional association for the VET system. a national professional association would support VET teachers and trainers in pursuing greater responsibility for the profession and increasing its knowledge base; this would assist in the development of VET teaching standards and contribute to an improvement in the quality of training/teaching; and as discussed above, it would be instrumental in accrediting VET teaching qualifications. Through this development, there will be more focus for the practitioners to develop their abilities as trainers/teachers. This point was canvassed by Wheelahan.L (2010) ¹, referred to in the discussion paper, where the point is made that a national professional association would “contribute to improving the quality of VET teaching”.

Such an association may have its funding provided by the Australian government. However, to maintain its independence, I believe that the bulk of its funding come from its membership. This membership to be made of both RTO's and VET practioners.

Recommendation: That a VET professional association be formed funded by government, RTO's and membership fees. This association be responsible for the ongoing professional development of its membership, registering/licensing VET practitioners, and improving the quality of VET teaching.

1. Wheelahan, L & Moodie, G 2011, The quality of teaching in VET: Final report and recommendations

In response to the question ***“What would be the most useful guiding purpose of a national professional association?”***

There are two primary functions of a VET association. One of the primary guiding purpose of the association would be to support VET teachers and trainers in pursuing greater responsibility for their profession and increasing its knowledge base; assisting in the development of VET teaching standards, and contribute to an improvement in the quality of training/teaching through professional development.

The other primary purpose would be the accreditation of holders of VET teaching qualifications to practice. This is critical to raising the standard of trainers/teachers and removes the onus of allowing RTO's to use those certified by themselves to train/teach. The centralisation of this function would see a standardised, national approach to practitioner quality.

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:

In answer to the question ***“What activities would be most beneficial for a national professional association to undertake? “***

To act as an advocate and voice for VET trainers and assessors.

Currently, VET trainers/teachers and assessors lack any voice in the decision making process in the delivery of training, assessing or the development of training plans. Often, where changes are being contemplated within the VET sector, the people that must deliver the training, or assess the competence of learners are not consulted. Often, those bodies that are making significant changes to the delivery of VET, will say that they have consulted with industry. This term will normally indicate a very narrow focus which equates to consulting with major industry bodies with a small smattering of smaller players in the industry. The result of this is often skewed. I have found decisions made in changing training plans that do not equate to what small business requires or needs. VET practitioners are not consulted and when questioning the direction taken, are often dismissed as their point of view being of little benefit. VET practitioners are often closer to what industry really wants due to their close proximity with small business who must work in the area and make up the back bone of the nation’s commercial interests.

To act as the national body that licenses/registers practitioners.

An independent professional VET association would be better placed to license/register an individual to train/teach in the VET sector. This model would be in line with issuing authorities such as the Legal Practitioners Admission Board of NSW, which admits individuals to the legal practice within NSW; is independent from university’s that issue legal degrees, and provides avenues for professional development. Following this model will mean that to train or teach one must be licensed/registered with the national association. To be clear, if no such license/registration exists for that individual, then they cannot train/teach.

To set standards and requirements for professional development

While it is a requirement of ASQA that those holding a TAE qualification undergo professional development, this is only happening in isolated pockets. There has been a failure to audit this requirement, leading to the unhappy result that we have students that may have received poor

instruction. A national VET association would be better placed to monitor the professional development of practitioners through a national licencing/registration system.

In response to the question ***“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 major advantage would be that it will provide a national focus and a national standard for all VET practitioners. Existing arrangements are normally at the state level and while this may provide a level of standardisation within a state there will be differences between states. This arrangement makes it more difficult to achieve a national standard, accepted by everyone. Often where the membership is with a teaching body in one state it may be with another body in another. A national association will provide a national standard and a single point of contact on all matters related to VET standards including professional development, industry voice and liaison with government and 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:

In response to the question ***“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?”***

My preference would be for Model B. This model will be better at remaining as a small and flat type of structure compared to model A. Model A, runs the risk of becoming a large bureaucratic body which will be costly to run and require a large admin workforce. I believe that model C will make it more difficult to achieve a national standard for professional development and liaison.

In response to the question ***“What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?”***

The best model of funding for a professional association would be a percentage of funds from government with the bulk of funding being provided by membership fees from individuals and RTO's. This model I believe will ensure an association that is independent.

In response to the question ***“Should VET teacher and trainer membership with a professional association be mandatory or voluntary?”***

Membership for individual practitioners should be mandatory. While being compelled to become a member of the association may be unpalatable to some, the issue is that the association to have any credibility must be seen to speak for the VET profession. If it is established as the body that licenses/registers practitioners, then there will be less resistance from practitioners.

6. Discussion questions – capability frameworks:
7. Discussion questions – increasing industry confidence:
8. Discussion questions – the role of industry in assessment:
9. Discussion questions – specific models:
10. Discussion questions – industry expectations and graduate capabilities:
11. Discussion questions – evidence of assessment and graduate competency:
12. Discussion questions – enforcement:
13. Discussion questions – cancellation and reassessment: