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:

    Dianne Kelly

3. Organisation (if applicable):

    Lennox College Pty Ltd

4. Please indicate your interest in this discussion paper: RTO, VET Practitioner

    (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? The new Standards should address this to some degree, but there are many RTOs offering the qualification in a sub-standard manner. Should the number be reduced to a targeted number of RTOs focusing on high-quality provision? The question needs to focus on quality rather than quantity. If the issue becomes about how to regulate those providers more closely, then the number is a logistical problem for ASQA. The large number of providers acts to keep the cost competitive as many people undertaking the qualification are not subsidised by state funding and we still need to be able to attract people from industry into training to maintain the currency and relevance of training. Making the qualification, at least at Cert IV level, an elite qualification offered by a select few RTOs, will drive the price up and make it less attractive to people in industry, or will require RTOs to subsidise or fund the cost of the training to their new teaching staff.

- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors? This relates to the above, as many RTOs train their own staff to attract new trainers from industry and reduce the cost of doing so. Perhaps this could be addressed by requiring that

all assessments for staff must be moderated by an independent validator, not employed by that RTO, to ensure that the assessments are rigourous.

- A sector wide, peer review validation/moderation for Cert IV TAE RTOs could build best practice and ensure high standards by all participating RTOs. The VET Network in Victoria developed some sound practices in sector wide validation for training qualifications.

- 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?

In order to conduct RPL properly, there needs to be an assessment of current competence and underpinning knowledge. If RPL is done properly, this process should be appropriate. Once again, perhaps all RPL decisions for a TAE qualification should be either conducted by an RPL panel within the RTO or independently validated or moderated by someone outside the RTO before the qualification can be issued. It is important to note that many people seeking RPL have been teaching in VET for many years and simply updating their qualifications already held, in which case, the process (if done well) is entirely appropriate.

- 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? Yes, minimum two years.
    - 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? Trainers and assessors teaching in Diploma level courses should hold at least the diploma level qualification or higher education level, such as Bachelor of Vocational Education or Bachelor of Adult Education.
    - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be? Yes, 20 hours for Cert IV and 200 for Diploma.
    - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? It would be a good idea to have a requirement that they have actually practiced assessment at Cert IV level before undertaking further training at Diploma level. Would this condition help to improve the relevance and validity of assessment? Not necessary by itself. Having a practicum, where a percentage of all of their assessment is co-signed by a supervisor for a certain period would enhance their assessment practice, but logistically, this could be problematic and expensive. How long would this period of time be? Perhaps one year minimum.

2. Discussion questions – skills and qualifications of trainers and assessors:

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?

  – Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools?

  – Is the *TAEASS502B Design and develop assessment tools* unit of competency a specialist unit that should only sit at the diploma-level on the basis the Certificate IV is currently designed for delivery to new entrants seeking to be trainers and assessors?

- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? Or is it too risky to do so? Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the argument put forward?

COMMENT:

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? How would this improve assessment outcomes for students?

  – Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? Are there alternative approaches, such as developing a new unit on the design and development of assessment tools? This used to be a core in the previous versions of the Cert IV and it was moved into the diploma based on the assumption that entry level trainers would be using existing tools for assessment and only experienced or senior trainers would design tools. I believe that the unit provides a sound foundation for learning about the structure of a unit of competency as, designing a tool to meet the unit requires a trainer to have a strong understanding of the unit and to map all of the components of the assessment tools to the entirety of the unit or units. The argument for removing that unit from the Cert IV was that assessors just assess using tools already created for them. This leads to a view that the assessments are fixed and approved and cannot be changed by the trainers/assessors, which dumbs down the skill level of trainers and assessors. Assessors need to be able to understand and break down the assessment to be certain that the unit requirement is being covered if they are to sign off that a student is competent.

  – 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? All suggestions should be considered, if possible, and changes made on the merit of the 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:

- Is there a need to establish a national professional association for Australia's VET system? Having a national professional association for VET professionals will provide a means for RTOs to select registered trainers, with more assurance of current, professional and engaged trainers, it also provides a recognition for VET professionals that they are "teachers".

  – 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? Peroquialism? Costs?

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

- To provide professional registration and recognition for appropriately credentialed VET teachers and to provide a continuing professional development framework which can be linked to their ability to remain working for RTOS = ie teachers must achieve XX points of CPD each year to maintain their registration and RTOs could/should only hire registered teachers.

4. Discussion questions – potential activities of a VET professional association:

- What activities would be most beneficial for a national professional association to undertake? For example, would it:

    – coordinate, approve or design professional development programs
    – develop capability frameworks
    – positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
    – act as an advocate and voice for VET trainers and assessors
    – interact with industry to respond to their emerging needs
    – register VET practitioners?

- What advantages would there be to conducting these activities at a national level rather than through existing professional development undertaken through membership of existing groups, or that which is currently organised by RTOs?

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

COMMENT:

- What activities would be most beneficial for a national professional association to undertake? For example, would it:

    – coordinate, approve or design professional development programs yes
    – develop capability frameworks yes
    – positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals yes
    – act as an advocate and voice for VET trainers and assessors yes
    – interact with industry to respond to their emerging needs yes
    – register VET practitioners? Yes
    – arbiter of complaints against trainers/ RTOs?

- 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? Sessional or contract trainers do not always have access to a range of PD except if they pay a very high rate. It allows for consistent messages to be conveyed nationally to all trainers.

- Are there any existing organisations that could fulfil this role? VET Development Centre, VELG, ACPET

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:

- 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? Model B

- What value would a VET professional association, or associations, add to the VET sector? Registration would allow RTOs to hire trainers with more confidence, legitimise VET trainers and build professionalism within the industry, especially if there was a level of mandatory CPD points required for re-registration.

- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs? As many individuals work with numerours RTOs, this should be an individual membership fee, but in order to make it affordable, some form of subsidy would assist.

- Should VET teacher and trainer membership with a professional association be mandatory or voluntary? This could be driven by the RTOs in their hiring policy and would go towards their quality management processes, ie they would only hire senior teachers or course co-ordinators if they are members etc.

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 Framework can be used to guide PD areas for small RTOs or individual practitioners. If the famework was adopted by the VET professional association then registered trainers could work towards recognition within their field as as part of their CPD points.

Discussion questions – increasing industry confidence:

- Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?

- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent?

  - What would be the benefits and drawbacks in requiring such tests? Under what circumstances would they be mandated, for example, for particular student cohorts? Should these be specified in training products?

  - Who should regulate the tests?

  - Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?

  - Is the concept of an externally administered test, such as a test required before receiving a qualification, inconsistent with the premise of a competency based VET system?

  - Should the results of tests be made public at the RTO level?

COMMENT:

- Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?

- Discipline specific moderation could apply across subject areas to set industry level benchmarks across RTOs. Prior examples of this include the VET Network which was a state wide moderation event for organisations delivering the TAE and Diploma of VET Practice, and the Electrical Senate which is attended by RTOs delivering electrical qualifications and sponsored by EEOz, the industry body, or the Plumbing teachers Association which meet to collectively write and validate assessments across plumbing qualifications in TAFE. These associations have existed despite inter-RTO/TAFE competition and commercial implications as the participants were involved to maintain the high standards of their discipline/trade.

- 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? No, Tests are not a good way to confirm competence. Reliance on "tests" is contrary to the competency based system and only reveals that a person is good at sitting tests and remembering things. There is no way that an exam can determine whether the dimensions of competency are being met.

  - 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? No point testing for gap training at the end of a qualification.

- 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? Yes
- Should the results of tests be made public at the RTO level? No, there are privacy issues.

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? Especially tricky in the current situation where IRCs have not yet been established and the role is still a little unclear.

- Course Advisory panels allow for "industry input" in validation, but even the selection of the Industry representative can be difficult or biased. The proposal mentioned earlier in the document for a discipline based peer validation process, in which industry could play a role with advice and guidance to all participants on current industry trends, might have merit in this regard, if not in industry panels.

- Do employers or industry groups have the skills required to fulfil this role in validating assessment? Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved? No, employers generally do not have skills to comment on validity of assessments, but can provide advice on current industry trends. Often, however, an industry expert will state that they no longer "do that" in industry, but the training package requires that we assess that component, so the RTO is required to go against industry advice in such a circumstance.

- Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done? Yes, but again, difficult to suggest how it will work until the IRCs are running properly.

- 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? Without the industry experts having training and expertise in relation to assessment, any input is often less valuable. Skilled industry experts are needed, but any such arrangements are likely to incur a cost to the RTO or the industry body.

- 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 Yes

  – mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk Yes

  – funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding. Not sustainable, it implies they do it once to get the contract and then not after.

- 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? Safety, health, construction exist in many ways through either professional registration following qualification or licencing.
- 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? Online perhaps for practical units? Regulation to impose a strategy where risk is identified by audit, high level of compliants or high risk profile of the provider.
- 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.
  - This begins to penalise the student for their study mode or the RTO non-compliance by making them resit assessments. A better solution in those situations would be to require that the RTO moderates all assessments, thereby ensuring the assessments are being checked off before issuing the result.

- 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? If reassessment applied to the specific cohorts for 100% online or workbased then it compensates for the lower face to face component of those training modes. In the case of a high risk RTO, then ramdom sampling would be better.
- 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? Firms like Vetassess which are supposedly specialist assessors are often inaccurate in their judgements are they are not specialist in the subject matter. Reassessment of qualifications brings about a distrust in the system. Improve the skills of assessors and trainers and make funding more uniform so that there is not a race to the bottom and quality will fix itself.

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?
- There have been many attempts to define what Job ready means and to incorporate that into training: Meyer key compentencies, employability skills, core skills framework. These are often ignored or glossed over, or changed just as RTOs come to grips with the best way to incorporate them into training and assessment.
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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:

- 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? Discipline moderation/validation group functions could evaluate assessment outputs of peer organisations, or other industry bodies such as ACPET, VELG etc

  – Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?
  – Yes ASQA should remain the regulator of this function so that there is one clear voice, but there needs to be work done to ensure that the ASQA auditors are consistent, the message is clearly articulated and support provided to ensure that message is clear.

- How could the focus of regulation move to evaluating assessment outputs? Reporting of external validation, ACPET Peer review reports
- 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? Where evidence indicates inadequate assessment, then the RTO should fund a reassessment.
- 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? Yes – great number of poorly assessed students has more impact on veracity of qualification.

12. Discussion questions – enforcement:

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

- Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? For example, should the regulator have an explicit administrative power to require a RTO to arrange and fund external reassessment, or should additional civil penalty provisions be created?

- To what extent should the characteristics of the RTO influence the response? Should the size of the RTO or the number of students involved matter?

- Given the need to balance procedural fairness with swift and effective enforcement action, what methods should be available to the regulator to manage RTOs that are repeatedly non-compliant with assessment requirements? How could such repeat offenders be defined?

- What role should regulators have in communicating their activities and findings? Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken?

COMMENT:
- How could the focus of regulation move to evaluating assessment outputs? Reporting of external validation, ACPET Peer review reports
- 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? Where evidence indicates inadequate assessment, then the RTO should fund a reassessment.
- 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? Yes – great number of poorly assessed students has more impact on veracity of qualification.

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:

For students impacted by recalled qualifications, there could be a scheme like the tuition assurance scheme whereby members could be nominated to provide gap training and reassessment for students in this circumstances and the fees paid by RTOs used to pay a set amount to the reassessing RTO.

  - Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud? Student fraud, yes,