



## 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:
3. Organisation (if applicable):
4. Please indicate your interest in this discussion paper:   
(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's website or otherwise be made publicly available?  Yes  No
  - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous?  Published  Anonymous
  - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

## 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:

NO - The same rules need to be consistent across VET. If limits, restrictions or specific quality standards are placed upon how many or which of the RTOs offer TAE then every other industry sector should be able to make the same rules. This means we have National Standards plus some unspecified industry body setting a supplementary standard.

NO – assessment must be valid, reliable etc in every instant. If a RTO cannot be trusted to assess its own staff they should not be trusted to assess the family of their staff, the friends of family etc. The RTO's processes must be sufficiently solid that all are reliable. Otherwise they should not be an RTO.

NO - Recognition of Prior Learning is assessment provided for a specific group. Assessment rigour does not vary from one group to another. Again, if an RTO cannot be trusted to assess people asking for RPL they should not be an RTO.

YES – there are opportunities

No, specified length of service is not a viable measure

No, a university qualification is not appropriate

The final two sub-dot points are covered in the next Discussion Question .

## 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:

YES – It is unfortunate that the least admirable qualification in the National VET system is the Certificate IV in Training and Assessment. It is primarily a knowledge-based qualification in a competency system that does not measure rigorous performance in either training or assessment. How can people for example who have never held a job in a specific industry or field assess reliably for that industry? Some component of a VET qualification must be a pre-requisite. Further, how can you be a professional assessor when you have not been required to ever create an assessment tool?

Australia needs a very comprehensive readable book that describes the features of our VET system. The contents of such a book need to be one pre-requisite of enrolment into Certificate IV in Training and assessment.

The second pre- or co-requisite needs to be at least two units from a Training Package at Certificate II or higher in VET.

These pre-requisites ensure a person knows the system and has experience in that system.

Then add a new unit along the lines of “Develop and use advanced group facilitation techniques” plus bring in as a mandatory unit “Design and develop assessment tools”. Strengthen the assessment expectations of all assessment and training units so these units need more training, more practice and more thorough assessment.

Remove the unit “Plan, organise and facilitate learning in the workplace”. Real facilitation of groups includes a need for one-to-one and one-to-few teaching so nothing really new is added by having this unit. Further, to successfully plan, design and develop programs that do not occur in a well resourced workplace is more difficult. And it can also be claimed that training is part of all workplaces be it at a workbench or in a separate room.

The Certificate IV in Training and Assessment should be built upon the following lines –

Number of units: **10**

### **Core Units**

- TAEASS401 Plan assessment activities and processes
- TAEASS402 Assess competence
- TAEASS502 Design and develop assessment tools
- TAEASS40x Evaluate and respond positively to assessment results and processes
- TAEDEL401 Plan, organise and deliver group-based learning
- TAEDES401 Design and develop learning programs
- TAEDEs402 Use training packages and accredited courses to meet client needs
- TAEDEL50x Develop and use advanced facilitation techniques

### **Elective Units**

Two core units from any national Training Package at Certificate II or higher.

These electives are the two that are the pre- or co-requisites.

The expectation that graduate must do two level 5 units strengthens the Certificate IV

Second Dot Point – I was a major contributor to the early Training Packages. I do not recall a situation where anything other than agreed consensus determined qualification packaging rules. Maybe majority should determine what the qualification outcomes should be and solid logic/discussion should determine which units best achieve that result.

### 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:**

Some value can come from a national professional VET association. I am uncertain that it is a 'need'.

The government could assist perhaps in funding one officer or two plus accommodation in each state or territory. This requires state organisations or at least a state branch structure.

Barriers relate to the diversity of interests in the system. One group already claims to represent private RTO. Small RTOs, government TAFE colleges, enterprise RTOs, community not-for-profit etc all see a different world. Then of course there are traditional state rivalries.

To bring all these into a 'strong and respected national voice' may be hard. And maybe this is not the primary reason for having a professional association as this role tends to represent the political lobby activists.

The purpose for having such an association include –

Enhancing the professional status of VET practitioners

Fostering continuing professional development,

Developing and promoting a code of conduct,

Facilitating improvements to standards,

Facilitating interjurisdictional alliances and good practice

#### 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:**

Third dot point:

The Training and Development Association (TADA), of which I am secretary at present, has operated in Western Australia for about 25 years. Membership grew at the peak towards 100 but has dropped in recent years below 20. However it maintains an emailing of 300 so frequently attendance at events includes more visitors than members. Visitors pay a higher attendance fee.

Several events are held across the year in evenings in Perth covering topics of current interest. A typical one maybe the Training Accreditation Council, sometimes with a federal colleague, making a presentation in relation to new standards.

## 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 A is preferable

Model B is overly centric; Model C would be ineffective as primary focus of teacher associations will and should always be the school sector.

The value is that it gives VET its own association which promotes professional growth, development and collaboration.

Membership could be at two levels –

All full-time VET personnel should be encouraged to be members

All part-time and those full-time who opt not to be members should be encouraged to be associates

Full members should pay an annual fee. However, this would effectively be a subsidised fee as staff would be paid a salary by the government and would handle day-to-day administration. Like the Perth-based Training and Development Association, events might have a two-tiered attendance fee.

## 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:**

No comment

## 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:

YES

**Chapter 2: Reforms to the assessment of students** is focused on recovery after the problem has been generated. It is too late once unreliable and invalid assessment has occurred.

Every effort must be made to ensure it is eliminated.

That requires a professional approach by well trained staff. That starts with Certificate IV in Training and Assessment. Fix this qualification.

Industry in the last 20 years has done a reasonably good job of presenting units of competency.

Too many people have been poorly trained. Maybe that should be have not been trained!  
Unfortunately many of the poorly trained became the trainers.

I expect a good deal of today's VET trainers and assessors do not look far beyond the Performance Criteria when they reading a competency.

Equally, the four dimensions of competency have been lost –

- Task skills
- Task management skills
- Contingency skills, and
- Job/role environment skills

Only Task skills are assessed. It is easy to do the task when everything is available and all goes well.

Managing the problems, handling the contingencies and performing to the standard expected in the work environment are what makes a person job ready.

And it's in these last three dimensions that most the knowledge and skills of the competency need to be demonstrated.

**TRAIN PEOPLE TO TRAIN WELL – ASSESS THAT THEY TRAIN WELL**

**TRAIN PEOPLE TO ASSESS FULLY – ASSESS THAT THEY ASSESS COMPREHENSIVELY**

Everyone needs to be fully capable of reading a competency, interpreting that competency, working out what assessment is required, designing that assessment regime to ensure every aspect of competence is covered. What degree of accuracy, what tolerances, what time limit, what standard, what volume, what checks need to be completed? This all needs to be explicit.

Everyone needs to be fully capable of reading a competency, interpreting a competency, working out what content needs to be included, what methods best suit its delivery and designing training that covers all this.

Then it is time to speak with industry representatives and brief them on what is planned to ensure there is agreement that the content and assessment is sufficient.

Another aspect to consider relates to the need for an RTO to have a document with a title of **Training and Assessment Strategy** that details processes to be followed for each qualification they deliver.

This should be subsumed into a **SUCCESS STRATEGY**.

This document must outline how they engage with industry to make sure every graduate is employable. That must be the aim of Training Package delivery and assessment. That's not easy to measure in short terms, employment may be delayed.

### **SAMPLE ASSESSMENTS**

There is or has been a reluctance to develop and distribute sample assessment tools. I believe there is a place for some of these to be developed as part of the total Training Package. All need to be clearly labelled "Validate with local industry contacts before use" or similar. However, someone must take a lead sometime.

### **TRAINING AND ASSESSMENT FACILITATION TEAMS**

Australia has invested millions into Training Packages and consequently has a good product. It has not invested anything like that amount in people. It's time to do so.

A small team needs to be brought together of determine what makes a good practical interactive hands-on approach to the delivery and assessment of a well structured Certificate IV in training and Assessment.

Once that is documented and reviewed a number of two-person teams need to spread out in and from capital cities to take this to initially all RTOs who have Certificate IV in Training and Assessment

on Scope, sometimes at a large RTO's premises, sometimes in neutral venues for small RTOs. Initially this is a train the trainer exercise.

In a slightly different guise these teams then contact key staff from all other RTOs, those that do not have TAE on scope.

This needs to be a professional development exercise, not an audit. Maybe it's the first role for the VET Professionals Association.

Yes, it will cost. And it helps and it's proactive. Maybe it builds a solid system from the ground up. One that does not need constant props and reactive counteractions.

## 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:**

My position is that industry puts huge effort into developing Training Packages. What the VET sector receives is an acceptable product.

As noted in response to 7 above I recommend industry adds a representative group of Sample Assessment tools, maybe peak competencies from a few of the common qualifications to set a standard of what is required.

Also from 7 above, I expect individuals in industry need to act as sounding boards for well-trained VET professionals to get feedback on Success Strategies and assessment tools. I suggest this is to be recorded by the RTO but is relatively informal.

My basic contention is that the issue must be solved prior to delivery and assessment. It cannot be fixed later – afterwards is too late.

## 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:

Put time and effort into ensuring the basic are in place. Avoid the failures before they occur.

## 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:**

A new focus on what is required by RTOs as they read and interpret competencies and move to comprehensive assessment automatically generates ‘job-ready’ graduates.

## 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:**

Once we have some Sample Assessment tools the audit will need to ask RTO staff how they use or exceed the quality of that tool. This gives a benchmark that has so far not existed.

The Standards need not change. The audit doesn't change beyond having a definitive measure.

## 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:**

Measure big RTOs by the graduates obtaining jobs as a result of gaining competency. There is a lag here but large RTOs should be able to follow up on graduates say for 2 years.

Measure small RTOs by how often they get repeat business – the real measure of a satisfied customer. Again, relatively low cost.

### 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:**

Eliminate the cause and the problem disappears.