



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:
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 Yes No website or otherwise be made publicly available?
 - 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:

COMMENT:

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

The number of RTO's registered to deliver TAE qualifications is not relative, rather setting high-quality standards, with regular audits and moderation of the delivery of individual trainers and assessors by their peers is more effective.

- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors? **Yes, most definitely.** Having trainers and assessors gaining their qualifications from an external RTO provides for transparency and also a form of moderation between RTO's whereby, trainers and assessors gain valuable information from another RTO and allows for consistency of approach.
- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning? **No. RPL is a very important tool and must be allowed as skills and knowledge can be gained from experience and also inherently known by individuals and this must be recognised.**
 - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? **I do not think that every RTO and everyone of the learners is 100% compliant however, I firmly believe that consistency between RTOs is paramount and therefore a standard set of RPL/Assessor kits and information needs to be produced by ASQA to ensure this approach is standardised** Should the practice be restricted? **Yes. Restricted to one set of notes, one set of assessment tools and one methodology of assessment and training**
- 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? **Opportunities for improvement are certain to evolve and become increasingly important as the workforce and innovation emerge naturally. If one set of notes, one set of assessment tools and one methodology of assessment and training are utilised will be a good start to improvement of the assessment skills.**
 - 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? **No. I do not believe that time or experience is as important as competency. If an individual can complete a task at a certain level consistently that is all that matters. If there is a restriction on employment history then there will be no change to the existing practitioners and it would be even more difficult for a new, fresh cohort of practitioners.**
 - 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? **University level qualifications (which I hold at an Executive Masters level) are no better than VET qualifications – which I also hold at**

Advanced Diploma level. What matters is competence and currency, not the piece of paper an individual holds.

- Should the TAE Certificate IV and/or Diploma require a practical component? **Yes, being able to demonstrate a skill is far more important than being able to write about it.** If so, how long should the practical component be? **Length of time is not important, either the individual can or cannot demonstrate the practical task to a commensurate level.**
- Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? **Having practical experience is extremely important however, should not become a pre-requisite to complete a qualification such as this-competence and currency is far more important. How could an individual get a start in the field of work if they don't have the qualification and how would they gain the qualification without experience?** Would this condition help to improve the relevance and validity of assessment? **No** How long would this period of time be? **Not relevant, as natural selection would indicate that if you cannot perform a task then you cannot be deemed competent and therefore would not be able to attain the qualification or employment in the chosen field of work.**

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

Comment

- Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? **Yes.** How would this improve assessment outcomes for students? **The Certificate IV gives the basis for delivery and assessment and without competence in this unit how could anyone design or develop assessment tools. An individual must be able to do to facilitate learning and be able to facilitate learning to design and develop assessment tools to ensure practicality.**
 - Should the core unit be the existing *TAEASS502B Design and develop assessment tools* unit of competency? **Yes** Are there alternative approaches, such as developing a new unit on the design and development of assessment tools? **There seems to be no issue with the current unit although improvements can always be made. Developing a new unit seems too extreme when the existing unit seems to work.**
 - 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? **Yes. The design and development of assessment tools is at a diploma level whilst the cert iv should only be restricted to training and assessment.**
- In the case of making any updates to the TAE, is it appropriate to form judgements based on majority considerations? **Yes, I believe that only the individuals that hold the qualification and are current ie working in the field, should be able to decide on improvements.** Or is it too risky to do so? **I do not believe it is risky, rather difficult to generate interest in change.** Is it a better basis for decision makers to give strong weight to key stakeholders and the nature of the

argument put forward? Key stakeholders tend to have alterier motives and tow a party line or political interest and should not be allowed to give strong weight to any decision

3. Discussion questions – benefits and purpose of a VET professional association:

Comment

- Is there a need to establish a national professional association for Australia's VET system? I agree that a national professional association governed by ASQA is a good way to achieve consistency across all aspects of training and assessment.
 - 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? yes
- What are the barriers to establishing a national professional association? Barriers include but are not limited to the geographic location of individuals and who they represent and how the individuals can be remunerated. How could these be overcome? Look at what has and has not worked in the past and work from there to achieve a system that is the best it can be and then improve on that constantly as an ongoing procedure.
- What would be the most useful guiding purpose of a national professional association? One that is focussed on achieving consistency of approach, change only when required and focussing on the existing standards

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

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
 - 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?All of the above is an excellent start
- 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? Consistency of approach is parramount to the success of any organisation and for it to be at state level or worse at an industry association level would allow the system to remain without vast improvement if required. A national level organisation under the auspice of the national vet regulator would be in a position to make decisions and ensure that consistency of approach
- Are there any existing organisations that could fulfil this role? ASQA

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

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? **See above comments - ASQA**
- What value would a VET professional association, or associations, add to the VET sector? **Consistency of approach and consistency throughout the whole sector**
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs? **Membership fees subsidised by the federal government**
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary? **Mandatory, a licensing system with CPD is paramount to the success of any system**

6. Discussion questions – capability frameworks:

Comment

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed? **That we need a consistent, national approach**
 - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association? **Yes, we can continue as is however, to put in place a national regime focussed on consistency and not self gain or commerciality would be far more advantageous**

7. Discussion questions – increasing industry confidence:

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? **I am sure that there are many alternate approaches not covered in the discussion paper however, I will always come back to standardisation and consistency of approach**
- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? **To ensure industry confidence consistency is paramount. When you have RTOs able to create differing training tools and assessment tools and one RTO's pathway is perceived to be easier than another, then industry confidence will be reduced.**
- For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent? **I do not agree with "tests" rather externally administered assessments with a practical component is a good idea. If an RTO does the training either another RTO completed the assessment or it completed by an external board/panel.**

- What would be the benefits and drawbacks in requiring such tests? **The drawback of a test suggests an academic approach and the word should not be used rather, assessment. The only drawback I can foresee is the cost and timing of the procedure.**
- Under what circumstances would they be mandated, for example, for particular student cohorts? **The assessment, not exam, with a practical component should be standardised much like a CPA achievement for accountants**
- Should these be specified in training products? **Yes, Nationally consistent ones**
- Who should regulate the tests? **ASQA - the national vet regulator**
- Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training? **The assessment should not have a pass/fail result, rather you are competent or not yet competent and indentifying gap training is a fair and flexible approach that improves the quality standards and ensures high quality outcomes.**
- 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? **Having an externally administered assessment with a practical component will provide the consistency required and conceive consistency anmdf confidence within the industry**
- Should the results of tests be made public at the RTO level? **Yes, A public register similar to that of the NSW Fair Trading contractor licensing portal would be advantageous for RTOs and learners**

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

Comment

- What role should industry, for example, employers and industry organisations, play in validation of assessment? **Industry organisations tend to be self interested and do not express the industry they represent correctly (this is learnt from experience). The role of individual employers is most beneficial as they will give the issue at hand a true evaluation and not tow a party line or internal policy**
- Does the varied interpretation of ‘industry’ inhibit a proper appreciation of the topic and should it be defined? **Yes, I believe that any individual involved in a certain industry is a representative of that vocation not a person who seemingly represents them and sits behind a desk making decisions without being “out in the field” themselves.**
- If so, who would best define ‘industry’ when considering the practice of validating assessment? **The people that are actually working in that industry and a current industry practitioners**
- Do employers or industry groups have the skills required to fulfil this role in validating assessment? **Employers may not have the skills to required as most employers are industry professionals that have formed a business based on their industry knowledge not training knowledge. As with Industry groups most definatly No, I do not believe they are as they can be tempted to make decisions based on their own agendas. Is assessment such a specialised skill that industry and employers either do not want to get involved or should not get involved? **Yes,****

Being an assessor is much like being a Judge or arbitrator. Assessment of individuals can only take place by individuals with the same or higher level of skills with an understanding of transparency, consistency of approach and being fair, flexible and sufficiently recording the outcomes. Employers are important to give industry requirements but as individuals not through an industry association

- Is there a need to build industry capacity and capability regarding involvement with training and assessment? **There is most definitely a need** If so, how might this be done? **This is a far bigger issue than one individual can definitely answer however, I do know that asking individuals to be involved without being remunerated does not work.**
- 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? **Pay them! I have sat on many boards and steering committees that have been sidelined by unions and industry associations that pay their representative to attend and tow the party line whilst good and knowledgeable individuals cannot afford to continue to debate issues at hand and become disinterested when sidelined by political interests.**

9. Discussion questions – specific models:

Comment

- How can independent validation be best applied to avoid a 'one size fits all' approach? **I believe that the one size fits all when it comes to training and education. Once again, consistency of approach is paramount**
- 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 . **Most definitely**
 - funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding. **Yes agreed**
- Should there be an increased role for external assessment by industry, and in which situations? **Not solely by industry, rather a group including current industry practitioners** For example, should it be mandatory for certain industries where there is a concern for public safety if a learner is incorrectly deemed competent? **All areas should be treated the same otherwise there will be inconsistency of approach, confusion and unwarranted debate as to what is and is not important and this will destroy confidence in the system.**
- 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? **It should not be risk based – see above**

- Should high-risk student cohorts be required to undergo independent reassessment of industry-agreed sets of competencies before being issued with their qualifications? **No most definatley not. All assessments should be completed under a consistent approach to a high level of competence. Having varying levels will cause a perception of favoritism and special treatment.**
 - 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. **All qualifcations should be treated the same, RTOs with any level of proven non-compliance should not be operating and outcomes of assessment should not be differentiated no matter how they are delivered or if they are considered a higher risk.**
- 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? **There needs to be one set of assessment and a strict protocol in the issuance of the certificate If so, how could such a sample be chosen? It cannot be done fairly or consistently. It needs to be competed correctly in the first instance and by RTOs with industry relevance.**
- Who would be most appropriate to oversee the reassessment of qualifications? **ASQA**
 - For example, could existing regulators or other organisations (such as firms that specialise in assessing students) take on this role? **Only ASQA**

10. Discussion questions – industry expectations and graduate capabilities:

Comment

- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? **Most definatley**
- If so, who should take this work forward? **The National VET regulator**
 - 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)? **Not if the assessments are carried out by current industry practuitioners. is there a common understanding of VET system outcomes? No. There are a lot of RTOs not interested in the industry they hand out certificates and qualifactions for and do not carry out assessments and or training comensuratre to the training standards or industry expectations.**

11. Discussion questions – evidence of assessment and graduate competency:

Comment

- Should the Standards for RTOs be revised to include strengthened and more specific rules around the conduct of and evidence to support assessment? **The issue with the standards is that they allow too much flexibility and interpretation.**
- Which elements that have a clear link to quality of student outcomes need to be strengthened? **Consistency between RTOs**

- 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? **No not really. A condition of registration is that an RTO must have industry experts with a stake in the business not sub-contractors that have no responsibility and also rid the industry of thrid party sales companies who will register anyone without checking their prerequisites.**
- 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? **Assessment inputs are far more effective. Checking things that have already been completed is useless**
 - Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students? **ASQA, as it has the authority and is independant**
- Are there other mechanisms that you would like to see added to the regulatory framework to prevent poor assessment? **Yes consistency of approach and a standardised set of assessment tools for both RPL and face to face or elearning.**
- For example, should training-only RTOs be recognised as a formal part of the regulatory framework. **No. All RTO's need to offer RPL and give their learners a choice of how they wish to learn**

12. Discussion questions – enforcement:

Comment

- How could the focus of regulation move to evaluating assessment outputs? **By having a standardised set of assessment tools.**
- Which additional regulatory enforcement options should be considered in dealing with RTOs providing inadequate assessment? **I think ASQA is sufficient however, banning of individuals with a history of poor performance would help rid the training industry of these tyrants**
- 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? **Yes I agree that the RTOs should pay for a reassessment and that Civil penalties would be a good preventative measure for extreme cases**
- To what extent should the characteristics of the RTO influence the response? **There should be no influences as all RTOs should be treated the same** Should the size of the RTO or the number of students involved matter? **No however, individuals responsible for the RTO actions need to be made responsible not allow it to fall directly on the CEO**
- 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? **These RTOs should be disbanded and their learners distributed to another RTO/s**
- How could such repeat offenders be defined? **Once an RTO has committed or found to be non compliant and then is found to either not be compliant or fails to adjust its methodology again, they should be deregistered and the CEO along with the other individuals that have a say in their running of the organisation, banned for a certain time period.**
- What role should regulators have in communicating their activities and findings? **Public register** Does current regulatory practice provide adequate transparency and disclosure, or are there other approaches that should be taken? **After undergoing a recent desk audit, I found inconsistencies and a certain clandestine approach to the review with no regard for flexibility or a site visit to explain the allegations. Although found to be compliant, I feel that the situation could have been handled a little better.**

13. Discussion questions – cancellation and reassessment:

Comment

- Where inadequate assessment has occurred, should the power to cancel qualifications be exercised more frequently than it has in the past? **I do not believe that the learner should be unfairly treated if they have the evidence however, if they cannot answer some simple questions relating to their level of competence in a certain qualification then the qualification should be removed if they decide not to complete the skills gaps identified.**

- What factors should affect this decision (for example, potential impact on public safety) and how should they be balanced? **There needs to be a competency conversation carried out by an independent suitably qualified and current assessor to gauge the individuals competence**
- 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? **Yes, any fraud should be treated by common law**
 - Should there be a time period after which ASQA should not move to cancel an individual's qualification? **No, time has nothing to do with it**
 - 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? **If the person received a qualification unfairly and cannot show competence and currency then no matter what, the qualification needs to be removed.**
 - Who should bear the cost of reassessment and any gap training found to be necessary? **The learner if found to be not competent with the RTO receiving a fine. If found to be competent than ASQA or the person making the accusation.** If the cost is to be recovered from the RTO, should this be pursued regardless of the RTOs financial viability? **Yes with the directoirs being personally responsible including the assessor and sales person.**
 - Who should deliver the reassessment? **There needs to be a competency conversation carried out by an independent suitably qualified and current assessor to gauge the individuals competence** Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment? **Possibly, although if found to be a rouge assessor another assessor should undertake the reassessment or another RTO paid by the original RTO**
 - What should the qualifications be for those doing the reassessment, and what industry experience and currency would they need? **The industry experience and currency needs to be standardised. There needs to be a competency conversation carried out by an independent suitably qualified and current assessor to gauge the individuals competence** To what extent should ASQA, industry or employers be directly involved in the reassessment process? **Depending on the circumstance, ASQA or their representative should check the reassessment using standardised assessment tools industry and employers especially employer group not be involved.**
- 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? **Yes** Should membership be mandatory for all RTOs? **Yes** Who should operate such a fund, and who should bear the cost of its operation? **ASQA and the federal Government**
- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications? **None – each individual should be treated the same regardless of their income. A person is not employed because they hold a certain qualification rather if they can perform their job.**