

1. RTO limitations

We congratulate those involved in this report for the scrutiny of the TAE qualifications. The variation in the quality of delivery and assessment remains despite the regulators efforts to exercise control in this area.

Maxima agrees in order to deliver TAE qualifications, additional requirements should apply. If these are deemed to be limiting the number of RTOs who can deliver qualifications, then we would support such a decision.

Further, Maxima strenuously agrees TAE trainers should have significant vocational experience in the units they are delivering in order to ensure participants get a pragmatic education on all the requirements of each Unit of Competence (UoC). We endorse the inclusion of a practical component to assessment as well as time spent in industry prior to the final issuing of the qualification. We do not believe that holding a university level qualification is necessary for the delivery of the TAE; the focus should be clearly on VET sector experience.

2. Skills and qualifications of trainers and assessors

Trainers and assessors must be able to design a basic assessment tool. It does not matter whether or not they are required to do this regularly in their role but in order to be effective assessors and contributors to validation, they must understand basic instructional design. On that basis the TAEASS502B should be in the Certificate IV but the performance evidence must be very specific about tool design and development.

3. Benefits and Potential activities of a VET professional association.

Maxima would be enthusiastic supporters of a national professional association for Australia's VET system. Maxima is a member of ACPET and VELG and find those associations invaluable to; source information and professional development and further, advocate on behalf of VET professionals and RTOs. We enjoy the professionalism of VELG in offering high quality professional development opportunities and resources and the advocacy from ACPET particularly Mr. Rod Camm, which is a great advantage to the sector.

The most significant challenges will be to establish an association that is highly regarded across the private and TAFE sector and has sufficient influence to make membership valuable to all stakeholders. The guiding purpose could be to act as conduit for information from and to government about the needs of the VET sector and professional development at ALL levels of RTO.

The IBSA capability framework is an excellent tool and it would be of great benefit for this to be broadly used as a minimum standard across the VET sector. Maxima would endorse this being

part of the project brief for a professional association and would envisage that registering VET practitioners would also be part of this brief.

Past projects which have had a lasting impact on the work of RTOs and professionals from the VET sector include (*Framing and Reframing The Future* – with funded projects that produced practical publications/resources used at all levels of an RTO.

4. Models for a VET professional association

Maxima's preference is model B. We would be concerned with state based or multiple provider models as the intent may not be consistently applied. The current disparity between states on funding requirements is very difficult to work with as a National RTO and we would support a National Approach.

A value add we would seek is advocacy to State and Federal governments and reasonable cost professional development directly related to knowledge of and meeting regulator standards.

It is reasonable to expect fees to be applied to the membership and we would see the fees applied to the RTO on a sliding scale based on the number of enrolments (not the number of staff as this can be manipulated). Membership should be mandatory for all RTOS being very mindful that a small or industry based RTO will find costs other than the recoup of operating costs prohibitive when added to the cost charged annually by the regulator.

5. Capability Frameworks

Per our response to question 4, we have found the IBSA capability framework an excellent. More professional development on its application would be productive and professional development aligned to skill development at each level would be advantageous. A system which promotes a single standard for trainers and assessors would make recruitment in this role a more transparent process.

6. Increasing Industry confidence

Maxima view the current media cycle of stories about poorly performing providers and those seen as 'roting' the VET Fee Help schem as having a significant impact on this industry. Whilst this is not directly associated with the engagement to the quality of assessment, it does influence the perception of industry and consumers with regard to the operations of VET training providers.

The challenge of industry engagement is the lack of agreed definition for 'industry'; providing a broad but well defined definition would enable better engagement strategies.

Maxima would not like to see the reintroduction of standardized testing with a pass/fail result reintroduced. The concept of competency based assessment, when used properly allows for the customization of assessment to suit the learner and the employer. This means training is plausible for participants who have not experienced success in a traditional academic setting

where testing is the primary source of assessment. It is our experience that learner's capacity to do a job is not demonstrated in this way.

7. The role of industry in assessment

We have, in part, addressed our concerns on the definition of industry in question 7.

There is no doubt industry endorsement of the assessment content and method has a significant impact on the employment opportunities for the participant.

However industry's capacity for involvement in validation is limited by their understanding and availability to be involved. For the large part the latter problem is where we experience the most impact in industry involvement in validation. Consider SME enterprises who are focused in maintaining and growing their business; their capacity to participate in validation is limited. The RTO then must find very innovative ways to meet the validation requirements.

It would be of value to have an 'Employer Kit' – where the employer has a reference on how their involvement will assist their business, what their role is and what they should expect in a validation session. It should describe the value employers add to the validation session.

8. Specific models

From an RTO perspective; independent validation would be a preferred model. That would mean that there is a standardized approach, in the validation technique and measures. . Maxima would endorse a best practice model in preference to a high risk model, and would also endorse the validation as a funding requirement.

9. Industry expectations and graduate capabilities

The experience in South Australia, where government audited the Certificate III in Aged Care and found in some part employers did not fully understand the course outcomes, indicates there is some need for resources on graduate expectations.

A comprehensive explanation of competency would be of great value both within the VET sector as well as for employers. Many people do not know the origins of competency based training and assessment and so are not able to value how it has positively impacted on the concept of employability.

10. Evidence of assessment and graduate competency

The redesign of training packages has strengthened the evidence to support assessment. On that basis it may be preemptory to determine if anything more is required.

Maxima would endorse the retention of assessment samples for a longer period, in order to improve accountability in the quality of assessment, provided electronic storage was an acceptable method.

The TAS documents vary much in quality and depth of information, some are very good and facilitate a clear understanding of training and assessment requirements.

11. Enforcement

Maxima would like to see the interviewing of students and employers as part of the registration audit process. Those cohorts are the best feedback on whether course outcomes are achieved, whether student's assessment prepared them for the employment outcome.

Enforcement is a matter for the RTO who administered the assessment and where feasible should spare the student and employer from any additional burden.

An RTO should always have a chance to provide follow up information where a discrepancy in assessment and evidence has been identified. The reassessment of this information should be undertaken by a new auditor for the purposes of transparency.

It is challenging to balance the desire to act quickly against non complaint RTOs against the desire to give all RTO managers an equitable chance to demonstrate their compliance with the requirements. Whilst more emphasis could be placed on user feedback, if this feedback combined with other evidence shows a systemic poor result then action depending on the severity of the non compliance, would be appropriate.