Submission to the Education and Training on Quality of assessment in vocational education and training

Prepared by: Federation of Parents and Citizens Associations of New South Wales

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:

    > Jason Vials - President

3. Organisation (if applicable):

    > NSW Federation of Parents and Citizens Associations

4. Please indicate your interest in this discussion paper:

    > NSW Parent Peak Body

    (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   ☒ Published   ☐ Anonymous
        applicable) to be published alongside your submission,
        OR would you like for only your submission to be
        available and your details kept 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.

- 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 allowing unlimited registered training organisations (RTO) to deliver Training and education (TAE) qualifications or skill sets beneficial for students, parents and the community?
We believe no it is not. The ability to have appropriate and high quality delivery of training packages to people in NSW and Australia is paramount to ensuring that the skill set of our workforce is of a high standard. By having a limited number of registered training organisations, this will allow for what we believe to be improved delivery and consistency of training packages across the country.
The number of registered training organisations if reduced may also provide the opportunity for improved compliance processes and procedures to be implemented and reviewed. Opportunity for economic growth is important but should not be at the expense of poor and inconsistent delivery.
If numbers are reduced how does this impact the delivery to regional and rural areas?
Providing criteria for registered training organisations to meet, that ensures delivery in regional and rural areas would have to be implemented.
To ensure that high quality and appropriate practices are followed, we believe that registered training organisations should not have the authority to issue or deliver TAE qualifications or skill sets to their own trainers and assessors. By allowing this to happen, opens the doors to discrimination in the workplace, bias and possibly lack of quality training and delivery of the qualification due to businesses seeking their own economic growth and bottom line over high quality outcomes.

Recognition of prior learning (RPL) is important in allowing professionals an opportunity to continue to extend their knowledge, experience and understanding of an area they have already received a qualification in and/or worked in. Through demonstrated assessment procedures, mapping of a person's competencies already achieved with existing training packages units, demonstrated experience, and professional feedback should be acceptable. The possibility of further increasing or improving upon assessment tools for recognition of prior learning (RPL) could only benefit this process and its ability to compliment an individual seeking to further their education.

Do we believe there are opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skills set?

Changes are needed to a degree that are practical and to a consistent and high quality of delivery. The idea of implementing a practical component for TAE certificate IV and Diploma would be beneficial in assessing and demonstrating knowledge of a professional industry.

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:

This should be decided by strong weight of the key stakeholders and be dependent on the arguments put forward.

Decisions on what units should be included in Training packages and at what level should be dealt with as per any other training package.

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:

Consistency and continuity are important elements for establishing and maintaining a high quality educational system for the people of NSW and Australia.

Do we believe there is a clear role for the Australian governments in assisting and developing professional skills of the VET workforce by funding a professional association? Yes we do.

Establishing a national professional association for Australia's VET system would not only compliment the state systems, but provide an overarching support and provision of consistent regulation throughout the country in relation to vocational and educational training (VET). The nation needs to be supported holistically and not just state by state, which can show varied outcomes.

Is this not currently part of the Australian Skills Quality Authority (ASQA) role?

As the national regulator for the vocational education and training (VET) sector, the Australian Skills Quality Authority (ASQA) seeks to make sure that the sector's quality is maintained through the effective regulation of:

Vocational education and training providers

Accredited vocational education and training courses, and

Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers including those delivering English Language Intensive Courses to Overseas Students (ELICOS).

Would the two exist? Would one be replaced by the other with increased roles and responsibilities?

Barriers to establishing a national professional association would include state organisations agreeing to the development of the association, and meeting the varying needs of individual states.

In establishing a national professional association the management of RTOs and the progress of a professional body for Trainers and Assessors, which allows for professional standards to be promoted and to comply with expectations of the wider community, should involve both the profession and industries that it may affect. This is a continuing role for the Government to oversee and encourage input from all stakeholders. The establishment of the Institute for Teachers within a number of the states may offer the basis for a similar institute for Trainers and Assessor nationally.

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:

As a national professional association it would be beneficial for the organisation to be able to undertake the activities and roles needed to support VET trainers and assessors across the country. The provision of one single entity providing the role of coordinating, approving and designing professional development programs, develop capability frameworks, advocate for VET trainers and assessors, register practitioners, and provide professional governance structures and teaching standards for the industry would ensure constant teaching practices in assessing and reporting were being undertaken.

The advantage of one single entity is that it may reduce the risk in regards to identification and addressing of problems or issues when they arise, due to the varies systems in place across the country. It would also hopefully provide increased regulation of the profession, where one organisation can react to an issue or need.

Professional development needs to be based on the model of the Quality Teaching Standards.

Does the Australian Skills Quality Authority not undertake some of these responsibilities? As the national regulator for the vocational education and training (VET) sector, the Australian Skills Quality Authority (ASQA) seeks to make sure that the sector's quality is maintained through the effective regulation of:

vocational education and training providers

accredited vocational education and training courses, and

Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers including those delivering English Language Intensive Courses to Overseas Students (ELICOS).

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

- Which of the suggested models for a VET professional association would be considered most preferrable 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:

We believe Model B should to be the preferred model to be considered

A VET professional association would undoubtedly add value to the existing professionals and stakeholders throughout the country, with the provision of one single entity providing the role of coordinating, approving and designing professional development programs, develop capability frameworks, advocate for VET trainers and assessors, register practitioners, and provide professional governance structures and teaching standards for the industry.

To ensure appropriate compliance and professional standards and processes are maintained establishing a mandatory membership fee for individuals and registered training organisations maybe beneficial in assisting the sustainability of the national professional association.

- 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:

As education needs to continue throughout life and benefits both the individual and the community in economic and many other ways, the community, through governments, should make available sufficient resources to see that reasonable personal aspirations and community needs are fully served. To provide equality of opportunity for success in, as well as access to, education for all, it is essential that alternative educational pathways are available for those groups whose capability is not truly reflected in their Higher School Certificate or normal school results.

Training courses should always include properly thought out units of competencies. Students gain these as a result of the way they are taught the subjects, including supported reflection on the subject material and job experiences. They should be expected to reflect on why the techniques they are taught work, where the industry for which they are learning is going, and what the environmental impact of the industry is, and about the power relations between people in the workplace.
The competencies should be assessed as part of the general assessment of the subjects.

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:

In regards to assessment, there should never be one tool used. The requirement of knowledge and understanding should be assessed using a multifaceted toolbox for assessing using varying techniques to determine assessing a person's knowledge and understanding.
An industry endorsed, externally administered test could be a practical way to determine if a VET graduate is competent, however should not be the only way to determine if competent within a competency based VET system. Competency is gained at different levels and this could be reflected in the results, and not just as a pass or fail.

In designing and regulating such test, it would be beneficial to ensure that this is a role of the national professional association to develop and administer.

- 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:

There is a role for industry to play in the validation of assessment. As professionals in their industry, knowledge and understanding of industry practices are current and known by employers and can provide additional assessing and reporting information on an individual.

For example the Aged Care Industry the RTOs are required to engage industry in the validation of the training packages for Aged Care Workers. As an RTO with Aged Care on scope there is an ASQA requirement to ensure industry links to the community that the RTO serves. This could take the form of meeting with the nursing Homes and conducting a validation session of the assessments. This practicality allows for the industry to ask why or why not this.

Specific requirements or criteria could be developed to assist industry and employers in fulfilling any validation and assessment requirements.
This may include:-
   Verifying practical experience of an individual in the workplace;
   Most training packages having a requirement of hours that are performed in the work place and
   being signed off by industry or independent assessors;
   Criteria for industry/employers to meet to be involved in validation of assessment; and
   Observing specific skills in the workplace and recording outcomes.

There is a need to have strong connection between the national professional association and industry to ensure that the validation and assessment processes of individuals has a holistic approach to the overall competencies and skill development of a student.

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:

No opinion offered

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:

P&C Federation have an expectation that competencies, skill sets, for any qualification from any of the training packages including the TAE package, will ensure that the students have on completion reached a national standard. Students need to be assured that the skill set they achieve will enable them to be able to gain employment in their chosen industry. Both government and industry should work collaboratively to ensure that VET graduate expectations are developed and implemented in regards to particular training products. Ensuring that a common understanding of the VET system outcomes are communicated and delivered, within assessment practices is instrumental in ensuring consistency and high quality validation and assessment practices are achieved and providing clear outcomes for individuals.

Employers and the general public need to be able to have confidence in the system that produces qualified people in any industry to have gained their skills at a recognized level. As an employer in any state of Australia should they wish to employ a Certificate IV TAE - trainer and assessor - they should know this person has gained the qualification and are regarded as competent in their role.

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:

No opinion offered however the streamlining of red tape should enhance opportunities to maintain qual RTO providers

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:

Two tier system approach.
Regulations impose a civil penalty provisions and as the regulator a national professional association has the ability to act swiftly in certain cases as outlined in regulations and professional code of conduct.
Any breach of regulations by a professional body could be made public allowing for transparency for students in identifying high quality training providers and registered training providers who have not been compliant.

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:

Regulation of the quality of assessment is an important factor that should be considered. Individual circumstances can be varied in regards to reassessment. It would be recommended that the National Professional Authority develop criteria to ensure that in regards to reassessment specific outcomes are identified and that consideration for reassessment may be undertaken, with guidelines outlined to identify what students may meet the requirements for reassessment and which students would not meet the requirements for reassessment.

There should be a consequence for poor outcomes from trainers and assessors and this should be addressed by the National Professional Authority.