



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 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:

Reports from our members indicate that trainers/assessors qualified with Certificate IV TAE are sometimes not competent to train and/or assess. In particular, the methods used for workplace training and assessment are often not sufficiently rigorous. This is important to our sector, as we promote a place-and-train model of employment and learning where possible.

We further note, the learning process should take at least as strong a focus as the assessment process. Rigorous assessment processes used with candidates who have been ‘short changed’ in their training will simply reduce the number of qualifications issued rather than strengthen the capability of our workforce, which is our key concern.

- NDS does not believe restricting the number of RTOs will directly affect the quality of TAE delivery. We recognise however, that it could be easier to monitor quality with a smaller number of providers. We further note that monitoring the teaching and learning process is as important as the monitoring the assessment process.
- NDS does not endorse RTOs issuing TAE qualifications to their own trainers.
- Recognition of prior learning is a valuable assessment method for candidates who have extensive experience and/or higher level qualifications. That said, tools need to meet the

rules of evidence and be validated rigorously against the units of competence. Certificate IV TAE does not differ from other qualifications in these regards.

- Opportunities to improve assessment skills of VET workforce through delivery and assessment of TAE qualifications:
 - NDS holds the view that TAE trainers and assessors should have a minimum of 2 years full-time experience training and assessing in the VET sector. Additionally, we contend that it would be preferable for them to have gained their experience employing a variety of delivery and assessment modes with a variety of learner cohorts including workplace-based candidates.
 - NDS supports the concept that VET practitioners delivering and assessing TAE qualifications should hold a Diploma in TAE at a minimum but further supports university-level qualifications, alongside the experience identified above, as the ideal. It is imperative they have a demonstrated understanding of sequencing and structuring of learning programs including positioning and timing of assessment points is demonstrated. Additionally, demonstrated experience in holistic delivery and assessment should be mandatory. Programs that assess via regurgitation of online material are not considered appropriate. Trainers in TAE programs need to draw on a much broader field of experience than their candidates will begin with.
 - The requirements of the Certificate IV and Diploma TAE should require a practical component that assesses the competence of the candidate to work with a range of candidates in a range of settings, for example, three different cohorts employing three different modes of assessment. It is important that the candidate is able to demonstrate the application of the principles of adult learning as well as management of groups. We do not consider that a time element would contribute to strengthening the outcome.
 - An assessable practical component of the Certificate IV (as outlined above), in combination with an assessable practical component of the Diploma, should see a competent graduate of the Diploma qualification. We do not therefore see a need to demonstrate employment history in the VET industry before being issued the qualification. NDS contends however, that holding a Diploma in TAE qualification is not sufficient in and of itself for a graduate to become a trainer and assessor in TAE qualifications. This should require a breadth of experience as a trainer/assessor as discussed above.

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:

Any assessor needs to have a good understanding of assessment design. They need to be able to adapt existing assessment tools to suit the abilities and context of the candidates they are assessing, as well as to make reasonable adjustments as required. This is highly relevant in the disability sector where the role of disability support worker can be applied to a vast breadth of activity in a diversity of contexts.

Therefore, if the Certificate IV TAE is to remain the entry requirement for a VET assessor, a unit on assessment design must be included. The diploma level unit TAEASS502B would be appropriate as a core unit in the Certificate IV course.

Again we reiterate our position that a focus is needed on the learning program not only the assessment outcomes. We want people who are competent in teaching, not just able to tick boxes for assessment. If they haven't learnt the material they won't be competent irrespective of the assessment itself. A focus by the regulatory body on the integrity of the learning program will contribute to competence in the area of assessment.

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:

NDS considers industry validation and moderation and input into learning program development critical to strengthening the quality of assessment. Government funding to support networks could make a significant contribution to meeting this end.

Local and regional validation industry networks could provide supports to trainers/assessors within the sector in terms of:

- validation and moderation
- networking opportunities
- invitations to professional development and in service training
- sharing of VET and industry updates
- peer validation of assessor competence
- resource evaluation and sharing, discussion of workplace assessment strategies, etc.

In our sector it is of paramount importance that VET trainers and assessors are up-to-date with evidence-based practice and philosophies underpinning the National Disability Insurance Scheme. This is as important as their skills in training and assessment. With limited time to engage in groups outside of their employing organisation, it seems logical they engage with one group with a dual purpose rather than having to engage in two separate professional groups.

Resourcing is required to develop guidelines for validation network practice, facilitators and travel. This could be done through a national professional association; however less costly methods, such as funding peak industry bodies, ITAB or Service Skills Organisations to coordinate this work, would in all probability meet the same need.

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:

Please see response to Question 3.

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:

NDS does not feel that funding a national VET professional association is the best value for investment.

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:

NDS does not consider that external testing is practical or necessary. While we recognise the benefits of monitoring the integrity of the RTO and students' skills and knowledge, we also recognise there are already standards in place to meet this end.

While some sectors require workers to meet 'ticketing' requirements, this is not necessary in our industry. We believe the drawbacks to external testing outweigh the benefits. Drawbacks include inefficiency, potential impact on candidate confidence and a lack of flexibility.

The disability workplace is an exceptionally complex one. Assessing learners involves engagement with the people they support, their carers and families. We believe it would be too difficult to design a one-size-fits-all assessment given the range of contexts candidates might need to be assessed in. It would further be quite difficult to have an external assessor come (respectfully) into such an environment to conduct a practice-based test.

Finally, it is critical to note that many of the skills and knowledge required to carry out roles within the disability sector need to be couched in the values base of the candidate, which needs to be informed by the underpinning philosophy of the evidence base drawn from. We do not consider assessment of this by means of an external test would be possible.

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:

At present there is no requirement for disability support workers to have a minimum qualification. Based on the experience in the Aged and Children Services sectors we are supportive of a well regulated VET sector and also investing in workers' skills and knowledge, though we note this need not imply a formal qualification requirement.

We strongly support employer engagement in the evaluation of RTO performance through validation networks.

Our belief is that for industry validation to be meaningful, it needs to be carried out with:

- Trainers and assessors
- Representatives from industry who are supervising and have in-depth knowledge of the roles targeted by the qualification
- Consumers serviced by graduates of the qualification

Assessment is only meaningful if the knowledge and skills prescribed by a unit of competence are assessed in a manner that is relevant to the workplace. Balancing the interpretation of consumers, workplaces and the competency standard during validation is a complex task that needs expert facilitation.

As explained at Question 3, NDS believes government needs to fund regional validation networks to carry out this work.

An industry validation network is considered superior to paid external validation or individual workplace validation of assessments. The two latter options provide too much opportunity for corruption of the intent of the process.

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:

NDS supports a validation process that aims to strengthen RTO practice as described in the first sub-bullet point above. We also support funding of training and assessment to be contingent on participation in a validation network and demonstration of continuous improvement as a result of such participation.

NDS does not support external assessment within the disability sector for reasons discussed at question 7.

As mentioned previously, NDS prefers a place-and-train model of employment and learning, This sees the employer play a part in the assessment process.

We believe all RTOs delivering in our industry should participate in validation networks. Concerns about performance of an RTO should be report to ASQA by employers.

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:

NDS considered that ongoing changes and innovations within industry would deem this exercise to be costly and difficult to manage thereby out-weighing the benefits.

As mentioned previously, NDS prefers a place-and-train model of employment and learning. This means that competence and job readiness are identifiable at the same point in time in the workplace.

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:

NDS believes that moderation of candidate work, in concert with validation of tasks, is the most effective measure of the standard of assessment and further allows a process for the examination of sufficiency of evidence in each case. More prescriptive standards risk the flexibility required to meet the diversity of people and environments encountered across Australia. Mandatory RTO participation in regional moderation meetings with de-identified samples of work would be the ideal.

Moderation can be undertaken as an activity within a validation network as mentioned in previous responses. This single regional body, which could link to a broader national network, could be coordinated with a fairly small budget. Links to ASQA would be useful to provide pathways to follow if it appeared that an RTO was not participating or strengthening their practice on the basis of feedback from the network.

The separation of training and assessment is not an approach that NDS endorses. We believe the additional expense in administration would not lead to any significant benefit. We actually consider that assessors would be less inclined to provide the flexibility and reasonable adjustment required by virtue of not knowing the candidate.

NDS members that are also RTOs report that there is often quite some difference in the interpretation of standards between auditors. We support a moderation of auditor findings by ASQA and the documentation of generally agreed upon interpretation of standards. We do not believe RTOs, with commitment to the disability and the VET sector, should have to work in the state of confusion that has characterised their operations in the lead up to and from an ASQA audit.

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:

With the use of a validation and moderation network, employers are quickly able to ascertain RTOs that are meeting the required standards and those that are not. It is predicted that demand for training and assessment services from a non-participating RTO would decline under such an arrangement.

Government agencies funding training and assessment could seek documented feedback from networks to ascertain the frequency of assessments being deemed 'not valid'.

NDS supports the suspension of an RTO's registration on the basis of significant complaint or repeat offenders, pending investigation into their compliance. Repeat offenders could be defined as RTOs that did not participate in regional validation networks and/or did not implement changes to practice on the basis of feedback from the network.

Clear direction needs to be provided by ASQA as to how an RTO can rectify its position if found non-compliant. Non-specific feedback from auditors is confusing and potentially costly to RTOs.

NDS supports a tuition assurance scheme designed to protect employers' and students' investment in training in the event the RTO is suspended or de-registered during their program.

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:

As mentioned previously, NDS believes that monitoring of learning programs and assessment processes will identify an RTO's shortcomings.

NDS supports the revocation of qualifications issued to ineligible candidates. Student confidence is based on registration and compliance with VET standards. Tuition Assurance paid as a component of student fees, would cover the cost of retraining and assessment, which may prove inconvenient but not a financial burden. Tuition Assurance would only be applicable in this situation if there was no element of candidate fraud.