



## Template for submissions to the *Quality of assessment in vocational education and training – Discussion Paper*

### Key consultation areas

The Department of Education and Training (the department) seeks stakeholder input on the *Quality of assessment in vocational education and training – Discussion Paper* (the discussion paper). The paper covers the following broad themes to improve assessment in vocational education and training (VET):

#### Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment
- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

#### Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued
- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

#### Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment
- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment
- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

### How to provide feedback

To support the Training and Assessment Working Group to provide the Australian Government Minister for Vocational Education and Skills with recommendations on how to improve assessment, stakeholder consultations will begin with the release of the discussion paper in January 2016 and continue through to Friday 11 March 2016.

Respondents may provide feedback on some or all of the discussion paper's themes. To assist with the compilation and analysis of the views of all stakeholders, respondents are encouraged to provide feedback via this preferred submission template, with attachments as required. Submissions in alternative formats will also be accepted.

All written submissions to the discussion paper and queries on the consultation process may be directed to the department via email at [trainingpackages&VETquality@education.gov.au](mailto:trainingpackages&VETquality@education.gov.au).

All written submissions will be made publicly available on the department's website, unless respondents direct otherwise. See the [terms and conditions for public submissions](#).

## Submission details

1. Submission made on behalf of:  Individual  Organisation

2. Full name: Elizabeth Horne

3. Organisation (if applicable):

On behalf of  
Outdoor Council of Australia  
& Outdoor Recreation Industry Council of NSW

*With contributions from*

*Employers*

*Volunteer Sector*

*TAFE Western - Lithgow*

*Pathfinders*

*Blue Mountains Adventure Company*

*Wilderness Escapes Outdoor Adventures*

*TAFE NSW Sydney Institute Randwick*

*Outward Bound Australia*

*RTO's*

*State peak bodies for Recreation*

4. Please indicate your interest in this discussion paper: 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 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:

Quality of VET Training may or may not be affected by the number of RTO's offering TAE qualifications. The quality of training is a combination of many things, not least quality and compliance of the delivery aspects of a qualification in conjunction with assessment. Thus the quality of training and assessment of the TAE underpins the quality delivery and assessment of the whole VET system.

A more comprehensive vetting system for RTO's offering TAE's may result in higher quality provision.

RTO's who deliver their own TAE should be able to prove impartiality by a strong third party/ external assessment.

Recognition of Prior Learning is relevant to this qualification. Sufficient rigour should be applied to ensure currency and knowledge of skills from the TAE Unit guides.

It is a requirement for all other courses within the VET system that the instructor must have currency in the subject matter they are teaching. Thus a TAE instructor/assessor should be able to show currency in the delivery of VET teaching and assessment.

It should be essential for RTO's offering TAE's to have a member of their staff who has the Diploma in VET as they may provide greater depth of knowledge and be able to provide moderation and create assessment tools for their staff. A university level degree may not provide as deep an understanding of the VET system, thus it may be counter intuitive to include this as a requirement.

Many TAFE's require their teachers to have a Cert IV in TAE as well as a higher qualification than the qualification they are teaching. For example if teaching a Cert III the teacher must have Cert IV or above. This model could be adopted to the RTO's delivering TAE qualifications.

As per all qualifications, the capacity to demonstrate competency in the unit of study is key. Thus it is important for a TAE graduate to be able to demonstrate VET experience as part of their qualification requirement. The length of the practical component would be different for Cert IV and Diploma. Having said that this measure alone will not improve the relevance and validity of assessment.

## 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:

Currently the Cert IV includes the following core units:

TAEASS401B Plan assessment activities and processes

TAEASS402B Assess competence

TAEASS403B Participate in assessment validation

TAESS502B Design and Develop Assessment Tools – it is absolutely essential that this unit is a core unit. It is foundational to all the TAE stands for.

If the competence of trainers or rigour of assessment is in question then the VET sector could move the qualification required to a diploma or graduate diploma of VET. The graduate diploma was a previous benchmark qualification that TAFE NSW applied to all teaching staff. This multiyear course ensured all staff understood the depth and scope of training and assessment and could construct valid teaching and learning activities.

The focus of this paper has been on assessment and not teaching hence the major component of the VET equation has been excluded from the conversation. A TAE qualification does not adequately prepare someone to deliver training and without extensive training and experience training outcomes will always remain inconsistent.

It is important to listen to all who are willing to contribute to the review of the TAE, sometimes the minority have a creative idea that the majority may be blind to.

### 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:**

Becoming a member of a national professional association does not automatically equal a more professional workforce. It would be much more appropriate to look at the base line qualification the TAE10 as being inadequate to provide the necessary skills, knowledge and experience of VET trainers and assessors. A proposed diploma or graduate diploma of VET studies would enable a thorough and rigorous qualification that would ensure teachers were equipped to plan and deliver lessons, construct valid and reliable assessments and undertake the role of a trainer and assessor in the VET industry. This would negate the need for a professional association.

It is important to remember that a VET professional is a dual professional, ie a professional trainer and assessor, and also a professional within their industry sector. It may be more appropriate for VET professionals to be members of the peak industry associations for the industry sector they deliver training to.

Is the issue lack of VET teaching and assessing skills, lack of currency in field of delivery, lack of up to date knowledge of industry trends, disparity of what VET teachers deliver and what industry needs/expects etc. A national VET professional association will not solve these issues.

#### 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:

A current VET Capability Framework exists and might be able to be refined. If capability frameworks are to be created for each training package it should be the responsibility of the Skills Service Organisation's to include these in the update of training packages.

Professional organisations such as VELG currently exist. Making membership to such an organisation mandatory for all VET professionals may simply add another layer of compliance to an already complex structure. Mandatory membership may not result in increased uptake of ongoing professional development of VET trainers and assessors. There are plethora resources online for the VET professional who seeks to continually improve.

The Qld College of Teachers, who manage professional compulsory registration for all early childhood, primary and secondary teachers, were tasked by the previous State Government with developing a professional registration scheme for Further Education and Training (ie FET = VET). This work was completed, but the current State Government has not chosen to enact the registration process. It appears to have been voluntary (to start with!)

VET professionals are required to have a minimum Cert IV TAE and currency in the qualification they are training in. It is best left to ASQA to check currency in both areas for trainers and assessors in RTO's.

The former ISC, Service Skills Australia, had a voluntary trainer/assessor accreditation called "Right Way" for the Service Industries. It is unclear as to what effect this had on the quality of training.

It might be interesting to explore the role that a Skills Service Organisations could fulfil in support of VET Professionals. Potentially their function could be expanded to include connecting industry and RTO's for a more collaborative development and higher quality delivery of training packages.

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

- Which of the suggested models for a VET professional association would be considered most preferable and viable in the current VET environment? Model A,B or C?
- What value would a VET professional association, or associations, add to the VET sector?
- What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?
- Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

### COMMENT:

Model A is too complex and adds an additional layer of compliance via an accreditation process. Model B is the preferred option.

Mandatory membership for professionals in the VET sector may simply add an additional compliance measure without solving the underlying issues.

Long term sustainability could be individual membership fees, as it is the individual VET professional that the Association should be targeting the services to. This alone will not sustain a national association, therefore it will likely to require ongoing support from the federal government.

It may be beneficial to allow the Volunteer sector to have organisational membership to ensure they are able to support the volunteer sector gain access to resources for continual improvement.

## 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:**

The VET Capability Framework provides simple structure and breakdown of the VET trainer skills at different levels. Use of this as a means of self-evaluation; or as a tool for a co-worker or supervisor to give valuable feedback could be implemented within RTO's as a professional development tool that is tangible and provides instant self-reflection and/or feedback. It provides feedback on practice that is key to an evolving VET professional. This tool could be used at all levels of VET instruction.

The framework could also be used by third party assessors within industry.

## 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:

If third party validation is to be successful, the industry representative must know and understand the Training Package in an independent and thorough manner so that feedback is objective rather than be skewed by a specific employers requirements; or specific RTO's agenda.

Externally administered test would add another layer of compliance and complexity and cost that will need to be monitored by RTO's and ASQA. Externally administered test are inconsistent with competency based training.

Third party assessors from within industry would need to complete skills set such as TAESS00006 – workforce Supervisor – to be able to contribute to assessment, mentoring and provide work skills.

The biggest issue is employers not understanding the training package and what the expectations of competency are. In this paper only one page was dedicated to it yet it is the single biggest contributor to angst, unhappiness and confusion. This debate has always existed as training packages espouse "job readiness" yet in reality no one who leaves a qualification can walk straight onto a job site without rigorous testing, orientation, familiarisation with work practices and time spent learning new roles. No training course or training package can do this yet the language used in VET design is "job ready". This change of language is the first step in education of industry.

The next step is having small or microbusiness contribute to the training package review in a meaningful way. Under the new VET reform industry will contribute to the review of the training package by providing in-kind staffing of technical working groups. Rather than spend resources to create a system of retesting, these resources could be used to pay experts to work on the TWG of training package reviews.

## 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:

Validation and moderation at an industry level will be particularly challenging for the Outdoor Recreation Training package. Employer and industry groups often do not have sufficient knowledge of the training package or the relevant skills and experience to contribute productively to validation/moderation at an industry level. In addition to this small business operators often do not have the human or financial resources to provide input, the system can then sometimes exclude small operators.

There is a need to educate industry about the training packages. Greater understanding of the units of competency, core units, assessment processes within the package will lead to a more informed industry. More informed industry will lead to a more informed conversation about the quality of assessment and outcomes from the training providers. This should lead in turn to a more effective VET sector.

There is already a heavy burden on assessment within training packages and the reality of having students reassessed against an external or industry body would make VET training in the outdoor sector even more cost prohibitive and less attractive. There is far less rigour in the university sector and students and employers will move to this model.

Payment, finding qualified staff, time away from industry, increase regulation are all issues associated with industry or external assessment.

## 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:

To incorporate re-assessment as a mechanism to improve quality of delivery and assessment of Training Packages seems onerous on all RTO's and industry. Decreasing levels of financial resources are already reducing contact hours.

If all VET Qualifications required a level of industry experience prior to graduation, industry would have the opportunity to provide feedback to the student and RTO regarding the student's competence in the work place. This would then provide a skills gap analysis that could be addressed in further course work. Ideally this would be throughout the course timeframe not immediately before completion. Outdoor Recreation is an industry where this industry experience is a necessity.

Industry may place importance on the number of assessment events but this is not the crux of the assessment dilemma at all. It is about content delivered and competence levels and how in turn that can be objectively assessed. Can the person do the job/ perform the skill without direction.

National consistency of qualification is particular issue in Outdoor Recreation Training Package, where employers report great discrepancies in graduate competence. The Outdoor Recreation industry believe the root cause for this is broader than just assessment.

External validation should be risk based. The factors might include:

- RTO profile – previous issues with non-compliance or substantiated complaints received
- Concerns raised by employers of a trend of a particular RTO graduates being substandard

## 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:

Higher order issues must be addressed to understand and discuss industry expectations and graduate capabilities.

Assessment will meet the standard set by industry if:

- Assessment reflects the training package
- Industry has input into the training package in the first place
- Industry has improved understanding of the Training Package and individual units of competence.
- We believe that there is disconnect within the Outdoor Recreation Industry between industry expectations of graduates being “job ready” and RTO’s producing graduates that are “currently competent” within the Training Package requirements. Some employers understand the difference, while others interpret “competent” and “job ready” as the same thing. Industry based validation of skills alone will not assist to address this disparity.
- Industry expects to provide internal training to familiarize new staff with standard operating procedures (SOPs) but should not have to be covering units from the training package.

Anecdotal evidence of two separate RTO’s delivering specialisation units in CERT IV rafting; one delivered the field component over 5 days on a river, and another delivering almost identical units over 20 days on a number of rivers. The cohort for both courses had similar pre-existing skills. It is not difficult to argue that the student who has paddled for 20 days has had more opportunity to practice skills and demonstrate competence than the student who has paddled for 5 days. However the qualifications would both list Rafting at a CERT IV level.

An employer must use more than just a VET qualification to screen potential employees. The impost is on the employer to interview, select, validate currency and induct employees accordingly. Employers in the Outdoor Recreation Industry in NSW are reporting anywhere between 2 days to 4 weeks of in house training for employee to be “work ready”. This is a liability to industry as it places employers, specifically small business at risk of being short staff as they cannot sustain high costs of staff training.

It will be incredibly challenging to ensure consistency across RTO’s re assessment unless greater emphasis by ASQA is focused on more far reaching audits of a larger range of RTO’s.

We have received anecdotal evidence from employers and RTO’s in our industry that suggests the different implementation of training packages at State level leads to very different funding models and subsequently different quality of training outcome for graduates. The reduction in training dollars to RTO’s over the last 5 years has had the impact of reducing face to face contact with students and the level of skills development they have in a variety of context. The result is that they may be competent within the assessment criteria in the training package but employers have

noticed a decreased capacity to operate in a variety of scenarios with that same competency. Thus Employers reporting graduates with less competence from a job ready perspective.

There is also some opinion within the outdoor recreation industry that changes made to the SIS10 Outdoor Recreation training package in the last review are no longer producing as job ready graduates.

Constant change in the VET system requires RTO's and VET Professionals to focus on the changing VET environment and ensure their internal systems are compliant. We must allow sufficient time to measure the effect of such changes.

Further to this we identify the gap between "competent" and "job ready" will always exist to a degree. There is no way RTO's can nor should they be expected to capture and deliver the culture and SOP's of all organisations in the outdoor recreation industry. This could only lead to a disabling monoculture that robs the Outdoor Industry of its diversity.

It is imperative that the federal government articulates the VET sectors role in producing competent graduates OR job ready OR work ready graduates. In some sectors competent within a training package does not prepare the student for work within industry without substantial resources and support from the employer.

## 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:

Standards for Training Package exist and a compliant assessment tools should address the evidence required to support the evidence. Under the VET Reforms and introductions of Skills Service Organisations, industry will have more input into the training package and therefore more guidance around what is deemed adequate evidence for competence. Those Training Packages that have already been reviewed to include the new Standards for Training Packages should begin to see changes in this area. Those that have not been reviewed have the opportunity to address assessment evidence as their TP is reviewed.

The length of time an RTO is required to maintain assessment samples is not likely to improve the quality of assessment. Adherence to Quality framework is more likely to. It is easy enough to maintain electronic records of assessment well beyond 6 months with current technology.

Consideration should be given to incorporating “industry independent experts” to assist ASQA in the registration stage of VET Professional, validating industry currency.

The regulatory body should not only focus on a desk audit for quality compliance but also consider developing a system of field/delivery audits, where the auditor would observe training and or assessment taking place.

Rather than training only RTO's - potentially all new RTO's should undergo external validation of their assessment processes and outcomes within the first 12-24 months of their registration. The capacity to maintain registration will be based on evidence of no less than 2 courses being externally validated. RTO's who have been found non-compliant should also undergo external validation for 2 years.

## 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:

If concerns are raised and substantiated with the regulator. An appropriate next step would be to implement complaint resolution policy and procedure. If the findings of these proceedings are such that the RTO is found to be not upholding Quality Standards then strategy to implement corrective action must be presented, including timeline. A full audit of the RTO could then be conducted within 12 months. If corrective action is not implemented surely registration could be suspended or cancelled.

### 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:

There needs to be a system in place whereby the student does not spend the money training with an RTO only to find their qualification is cancelled. This comes back to more rigorous requirements to become and maintain RTO registration. A tuition insurance scheme I probably required.

Rather than cancel a qualification immediately the opportunity for reassessment must be offered to the student at a cost to the state or federal government or at least covered by tuition insurance scheme. The responsibility for the RTO underperformance should be borne by the registration body for the RTO.