Quality of assessment in vocational education and training – Discussion Paper
January 2016

Paul Saunders - comments

- I welcome the opportunity to provide advice on ensuring that the Australian VET sector provides high quality learning outcomes for all stakeholders
- I fully support the concerns and aspirations expressed in the Executive Summary on page 4
- however I am concerned about the lack of supporting evidence for the assertions presented in this paper and the apparent limited understanding of the design and functioning of the Australian VET system
- I request that before yet more reforms are introduced that:
    - a broad, clear understanding by all decision makers of the design and functioning of the Australian VET system is confirmed,
    - a broad, clear understanding is developed by all decision makers of critical aspects of the system that have significant impact on the quality of learning outcomes,
    - the changes introduced to the system since its introduction are identified,
    - the current problems are quantified and analysed,
    - the root causes of problems are determined,
    - appropriate solutions are identified through comprehensive research,
    - broad consensus on appropriateness of solutions achieved,
    - proposed solutions are trialled,
    - following successful trials resources are appropriately allocated and solutions are implemented.

In order to inform this process I offer some commentary on the first three points. These comments are not supported by evidence in this document. I am not employed to carry out research and policy development hence this omission. However I will provide the supporting evidence should it be required. The views expressed in this response are mine and should not be attributed to my employers.

The design and functioning of the Australian VET system

Australia currently has a unique approach to vocational education and training that is not found anywhere else around the world. Virtually all vocational education and training in Australia is competency based.

Central to the system are units of competency. These are statements describing aspects of a work role. To date they have been developed by industry representatives working with Industry Skills Councils (ISCs) to "codify" the skills, knowledge and attributes required by a person to successfully perform a particular role in the workplace. There has recently been a major reform to the process by which Training Packages are developed but essentially units of competency retain this central and critical function. Australia has invested very heavily in this "codification" of work tasks over many years and the value of this national "asset" should not be under estimated.

Units of competency can be worked towards and achieved individually, or in groups, as Skill Sets or packaged together according to specific rules to equal a nationally recognised qualification. The packaging of qualifications is required to conform to the Australian Qualification Framework (AQF). This aspect of the system is designed to ensure that qualifications are portable, indicate a general

level of attainment and provide credentials linked to further study. It should be noted that the AQF has been retrospectively overlaid on existing VET qualifications without those qualifications necessarily having been thoroughly re-examined and repositioned within the AQF. I suggest that a significant number of qualifications do not conform to the AQF level descriptors. This is a problem within the system if graduates of a particular qualification do not actually have the attributes associated with the AQF level.

The fact that units of competency may be achieved individually or in small groups or as full qualifications is an aspect of the Australian system not replicated elsewhere. It provides great flexibility to meet local student and /or employer needs. It can provide for quick 'just in time' up skilling and is a very valuable aspect of the Australian VET system. Jurisdictional funding arrangements variously support or hinder this aspect of the design of the system.

The recent introduction of "continuous improvement" of Training Packages rather than a static 5 year life cycle has further enhanced the ability of the system to respond rapidly to changes in the modern, dynamic economy. However the development of units of competency within a continuous improvement regime needs considered application. Units must be written in a manner that is "future proof" so as to prevent continuous re-writing of units to accommodate small changes. The "churn" caused within the system by poorly written units has been a massive impost on learners, enterprises and training organisations in recent years.

In the original design of the VET system the input by industry representatives to the process ended at this point. Training Packages were endorsed and became available for Registered Training Organisations (RTOs) to offer to potential students and / or their employers.

RTOs were required to identify the characteristics of particular students or cohorts of students and develop training and education programs that would enable students to achieve competency as described by the industry determined units of competency. Students might undertake training towards individual units, groups of units or complete qualifications. Training might take place in a classroom, in a workplace, on-line or some combination of these methods. Students may be granted formal recognition for study or work experience they have already undertaken or the training program tailored to take into account prior experience. This flexibility in delivery methods is an enormous strength of the Australian system and will become ever more relevant as new methods of education and learning become available with further advances in information technologies.

Such flexibility is not available in more traditional VET systems that are characterised by defined inputs – a curriculum. In a curriculum based system to achieve a particular accredited outcome participants must follow the curriculum. These curricula are typically defined at a national or other jurisdictional level and all participants are required to work through the full curriculum. This inflexibility hampers innovative delivery methodologies, requires all participants to study for the same period irrespective of; prior experience, aptitude or age and is unable to accommodate local requirements or rapidly evolving skills needs. Curricula appear to be more generally understood than the Australian competency based system. One possible way to address some of the current concerns over quality in the VET system would be to commence the development and implementation of a VET curriculum. This would no doubt be required to be a national curriculum, would mandate what is to be studied, and how and would encompass standard assessments. This may be the solution to the current malaise but would be a massive undertaking (consider the work to date to develop the national curriculum for the secondary school sector), would require development by educational specialists and would introduce a level of inflexibility contrary to the needs of a rapidly evolving economy.

Following on from the 2009 paper 'Training Products for 21st Century' the Standards for Training Packages were introduced in 2012 with a requirement that all Training Packages were compliant with the Standards by the end of 2015.

The Standards introduced a fundamental change to the Training Package construct. The Standards required ISCs to add Assessment Requirements to every unit of competency. This appears to have been a response to emerging concerns that graduates deemed competent were found not to be so when moving into the workforce.

Assessment Requirements encompassing Performance Evidence, Knowledge Evidence and Assessment Conditions were added to units. These requirements were developed in conjunction with the rewriting of all units by ISCs working with their industry representatives. Unfortunately the re-writing of units and the addition of Assessment Requirements has not been completed in all cases. There have been examples of very little improvement to Training Packages and the addition of poorly conceived and inappropriate Assessment Requirements.

The significance of these change does not seem to be widely appreciated across the sector. The development of training programs that necessarily include assessment strategies has been taken out of the hands of training specialists and given to industry representatives that do not necessarily have the backgrounds, training experience or educational qualifications related to the design of assessment. This is not to mention whether industry representatives have the time to devote to adequately address the complex issue of assessment. It is worth recording here that the 2014 ABS figures indicate that less 3% of Australian enterprises employ more than 20 staff. It is unlikely that the remaining 97% have the time or staff capacities to write assessment requirements.

If Australia is to retain a competency based VET system it is essential that the fundamental importance of the unit of competency is understood. Units must be prepared to a very high standard. They must accurately document the skills, knowledge and attributes that a graduate requires to work successfully in a particular field. Units must adhere to the intentions of the Training Products for 21st Century project in that they must be written in clear English, not include unnecessary guidance material, be precise without vague, generalist statements. They are essentially a specification and must be written to the standard of commercial product specifications.

Units should not include mandated assessments or unnecessary information about assessors both of these aspects are very clearly required under the Standards for RTOs 2015.

The effective delivery of training towards competency and the assessment of achievement of competency is the responsibility of RTOs. This is another aspect of the Australian VET system that has undergone radical change since the original implementation of the competency based system.

When the competency based system was originally conceived and implemented the vast majority of vocational training and education was delivered by large, publically owned, quality assured educational organisations: Training and Further Education Institutes (TAFES). These specialist educational bodies had the capacity to effectively work with Training Packages and units of competency. They were able to analyse the training needs of particular cohorts of learners, develop customised local training programs that included assessment procedures in accordance with best adult education practice. These organisations undertook internal validation, moderation, course improvements strategies and other quality assurance processes.

Since the 2012–16 National Partnership Agreement for Skills Reform many new and very different organisations have become providers of vocational training and education (an increase from approximately 60 TAFE Institutes to a total of 5000 RTOs). The introduction of an open market for the delivery of VET in some jurisdictions and the entrance of new non educational entities to the training sector have coincided with the increasing concern about quality in the sector. The marketization of public service delivery is known to be a complex process and it appears that full planning had not been undertaken prior to this upsurge in entrants to the training sector. Regulatory regimes, regulator capacity and market entrant requirements were not sufficiently advanced to cope with the unprecedented growth in the number of RTOs. The Standards for RTOs 2015 (SRTOs) have gone a long way to correct some of the inadequacies in the system but these must now be rigorously enforced. The SRTOs very clearly require RTOs to conduct their activities in an educationally sound manner. The enforcement of the SRTOs will in a large part bring about a return to assured quality in the system and confidence in outcomes. It would seem wise to allow the SRTOs to be fully implemented and enforced before adding yet more complex compliance measure to the VET sector.

The introduction of further compliance measures around assessment is not required. It will be an additional cost to the public purse and a further impost on high quality RTOs which are already crumbling under the compliance burden introduced to weed out poor performers.

In response to your particular recommendations:

In order to answer this question it is necessary to have details of the empirical evidence on which the initial assertion is based:

> *"The assessment skills of the VET workforce have been identified as a key issue undermining the quality of assessment outcomes"*. (p.9)

I rigorously review research papers relating to vocational education and am not aware that any study has been undertaken that will support this assertion. Such a study is a necessary pre-cursor to designing and implementing new VET policy.

- 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?

Comment:
All RTOs should be of high quality. This is the purpose of "registration" and the responsibility of ASQA (or the relevant State regulator) to regulate and guarantee.

If an RTO holds current registration and meets all the criteria to deliver TAE it necessarily can deliver TAE.

- Should RTOs be restricted from issuing TAE qualifications or skill sets to their own trainers and assessors?

Comment:
As above.

- Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?

Comment:
RPL is merely an assessment methodology. It must be as rigorous and valid as any other assessment methodology. This is true of all qualifications.

- 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?

Comment:
Please investigate and provide the empirical evidence to answer this question.

- 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?

Comment:

Performing valid assessment is an extremely complex and sophisticated task. Please review the extensive research literature on assessment and it will become clear that of course assessment practices can be improved at all levels of education.

The TAE is an entry level qualification for VET teaching. It provides for a basic understanding of assessment. The holder of a TAE must only undertake assessment as part of a team within a RTO compliant with the Standards for RTOs 2015. The RTO infrastructure provides the quality assurance of individual assessment decisions.

- 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?

Comment:

This is a requirement for the delivery of the TAE under the Standards for RTOs 2015.

- 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?

Comment:

Empirical evidence documenting poor assessment practices by holders of the TAE undertaken within fully compliant RTOs

- Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?

Comment:

The Diploma does.

The TAE Certificate IV qualification might be improved in many ways. To qualify to teach in the school system one must undertake and successfully complete supervised teaching rounds. The addition of assessed supervised teaching would enhance the TAE.

- 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:

Entry to any VET qualification is required to be based on a pre-training review that considers whether the entrant has the ability to successfully achieve competency as a result of the training program to be delivered. This is sufficient for the TAE Diploma as with any other VET qualification.

- 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?

Comment:
As stated above the TAE Certificate IV can of course be improved. In a compliant RTO a single holder of the Certificate IV TAE does not develop assessment tools. These are developed, trialled, moderated and validated by a team of VET professionals that includes staff with qualifications higher than a Certificate IV and extensive experience in education and assessment.

- o 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?

Comment:
The unit is entirely appropriate for this entry level qualification but must only be utilised ina fully compliant RTO.

- o 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?

Comment:
Where the unit sits is irrelevant it is the process and infrastructure of the RTO that is critical

- 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:
The development of a VET qualification must follow the rigorous processes mandated in the current Training Package Development & Endorsement Process Policy. When this process is diligently followed high quality VET qualifications fit for purpose are produced.

Please provided the references for these projects:

> *"There have been a number of research projects which have identified the <u>need for a professional body</u> to enable VET educators to take greater responsibility for the professionalism and knowledge base of the sector."(p.11)*

The quoted reference do not assert this. Please provide research evidence to show that the development of a professional association in an educational field has enhanced student outcomes.

- Is there a need to establish a national professional association for Australia's VET system?

Comment:
Please see comments above.

- o 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?

Comment:
No however – all workforces in the 21st century must be involved in a process of continuous improvement. Governments have role to play to enhance the funding level of the VET sector on a par with the school and HE sector and reverse the decline in real funding levels in VET of the last decade.

- What are the barriers to establishing a national professional association? How could these be overcome?

Comment:
Not able to provide and answer without some valid research showing that the development of a professional association in an educational field has enhanced student outcomes.

- What would be the most useful guiding purpose of a national professional association?

Comment:
As above

- What activities would be most beneficial for a national professional association to undertake?

Comment:

For example, would it: These first four points are all elements of any work force development program. They are currently available to the system and I see no benefit in duplicating what already exists.

- o coordinate, approve or design professional development programs
- o develop capability frameworks
- o positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
- o act as an advocate and voice for VET trainers and assessors
- o interact with industry to respond to their emerging needs

Comment:

Industry input to VET is clearly defined in the process for the development of training products and in the Standards for RTOs 2015

- o register VET practitioners?

Comment:

What is the purpose of registration?

- 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?

Comment:

An effective national VET system in Australia is a sensible goal for the nation. There is a great deal of work still required across jurisdictions to bring this into being. Should a national system be achieved then a national approach to VET workforce development would be a required adjunct.

- Are there any existing organisations that could fulfil this role?

Comment:

There are organisations that do fill this role.

- **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?

Comment:
Insufficient evidence has been provided to indicate that an association would have any positive benefit on student training outcomes. If such positive outcomes can be proven thenis the time to discuss what and how to implement.

  - What value would a VET professional association, or associations, add to the VET sector?

Comment:
As above

  - What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs?

Comment:
As above

  - Should VET teacher and trainer membership with a professional association be mandatory or voluntary?

Comment:
As above

- **Discussion questions – capability frameworks:**

  - What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?

Comment:
Workforce capability frameworks are useful tools in workforce development processes.

A Standards compliant RTO must necessarily have a workforce development program in place and may make good use of capability frameworks.

  - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

Comment:
Work force development is a long term continuous process which must always utilize the best tools available at any particular time.

- **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?

Comment:

"Industry" in Australia is a multi-facetted deeply segmented sector of the nation. Very few organisations that might be described as industry have the time, skills, knowledge, expertise or motivation to have any further input than they already have. The Australian competency based training system requires industry representatives to describe the skills, knowledge and attributes they need in their workforce. It is the role of RTOs to develop training programs to enable individuals to develop those competencies.

- 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?

Comment:

Yes ensure that only RTOs fully compliant with the Standards for RTOs retain registration.

The duplication of assessment processes is inefficient and unnecessary.

- o 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?

Comment:

Compliant RTOs deliver graduates with the competencies that industry representatives have determined.

To ensure that graduates have the competencies industry requires much greater rigour must be applied to the development, quality assurance and endorsement of training products especially at the unit of competency level.

- o Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?

Comment:

I cannot provide an answer to such a simplistic question.

Any assessment instrument must be fit for purpose. The design of any assessment instrument is a complex task requiring sophisticated pedagogical knowledge, clear understanding of the use of the outcomes of the instrument, trialling, adjustment, validation etc.

o   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?

Comment:

No - competency must be determined by the application of a range of valid assessment methods. The assessment methods and instruments used need to be appropriate for what aspect of competency is being determined. A test may be a relevant instrument. Whether a test is administered internally or externally is dependent on the constructs within which education and training are taking place. Compliant RTOs necessarily have the capacity to administer all required assessment strategies.

o   Should the results of tests be made public at the RTO level?

Comment:

The publication of educational data appears to have some value to a society where there is choice in educational provision. The determination of what data is published and at what level of detail requires appropriate research to be undertaken and broad stakeholder consultation to achieve measures that provide value.

- 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?

Comment:
This question displays a lack of understanding of the design of the Australian VET system and the capacity of Australian commercial entities to have greater input. Industry representatives specify the competencies they require in the workforce. Compliant RTOs train individuals to achieve those competencies and confirm achievement through appropriate assessment methodologies.

- 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?

Comment:
I work on an almost daily basis with industry representatives. I am yet to meet anyone with a specialist qualification in education.

- Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?

Comment:
The purpose of our industries is to successfully undertake profitable activities. The purpose of our education and training sectors is to train people.

- 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:
Engagement with industry is already appropriately targeted.

- 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:

Comment:
Independent validation is an unnecessary impost on the system if only compliant RTOs are operating.

- 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.

Comment:
Compliant RTOs have the capacity to undertake valid assessment.

- mandatory requirement to lift quality in specific instances, for example, where a qualification is identified as high-risk

Comment:
The required competencies of VET graduates is defined by industry representatives. Compliant RTOs only deem competent those participants that meet the competency standards.

If greater levels of competence are required then the industry representatives must upgrade the competencies.

- funding requirement, for example, independent validation of assessment could become a requirement for RTOs seeking to access government funding.

Comment:
Validation of assessment is a requirement to be an RTO. Being an RTO is a requirement 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?

Comment:
If a learner is incorrectly deemed competent the RTO must be de-registered. If this does not occur then what is the purpose of registration?

- 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?

Comment:
Independent validation is an unnecessary, extremely costly and largely unworkable addition to the VET system that will not enhance student outcomes.

- Should high-risk student cohorts be required to undergo independent reassessment of industry agreed sets of competencies before being issued with their qualifications?

Comment:
As above

- 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.

Comment:
If an RTO has any non-compliance it must have registration removed in full. That is the point of a "regulatory regime".

- 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?

Comment:
As above

- 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:
A compliant RTO

- **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?

Comment:
Industry does this – that is their role in the development of Training Packages

- 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:
From this document it appears that there may be very poor understanding of the VET system and VET system outcomes.

- **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?

Comment:
The Standards are comprehensive and appropriate. Non-compliant RTOs must have their registration removed. Why duplicate processes?

- 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?

Comment:
High quality RTOs have always had document retention rules as does any reputable educational organisation. Extending this to all RTOs is necessary.

- 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?

Comment:
Jurisdiction wide moderation of student outcomes is common practice in school systems. Internal moderation and self-validation is the norm in the HE sector. Internal moderation and self – validation is the requirement in the VET sector. Compliant RTOs reliably internally moderate and self-validate.

An external moderation system is extremely expensive to operate.

   o Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?

Comment:
ASQA already has responsibility to oversight this function through the Standards for RTOs 2015.

- 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:
The mechanisms are already across the VET system – they need to be used.

- **Discussion questions – enforcement:**

- How could the focus of regulation move to evaluating assessment outputs?

Comment:
The focus needs to move to de-registering RTOs that do not comply to the Standards

- 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?

Comment:
Non- compliant RTOs must be de-registered and measures taken to recover monies and provide adequately for learners who have been disadvantaged.

- 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?

Comment:
All non-compliance must be dealt with equally.

- 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?

Comment:

The regulator is there to regulate. They must have powers to immediately stop non-compliant behaviour. There cannot be such a thing as repeat offenders. If a business entity has been non-compliant then they are de-registered. A new application for registration would be submitted and if any senior personnel of a de-registered RTO were part of the application they would fail the proper person test.

- 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:

Full transparency and disclosure.

- 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?

Comment:
Very much so

- Should a scheme for the reassessment of students be implemented? If so:

Comment:
Yes at the expense of the de-registered entity

  o Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?

Comment:
It is the responsibility of the RTO to ensure students do not undertake fraudulent activity. If a student engages in fraudulent activity an RTO will not deem them competent.

  o 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?

Comment:
ASQA must operate in 'real time' to ensure all registered RTOs are compliant.

Current registrations may need immediate review to ensure that RTOs have the capacity to be compliant.

How has an individual received a qualification that is not valid? The awarding RTO should never have been registered in the first place. Where this has occurred the learner must be appropriately compensated, re-training offered and provided. If a person is incapable of performing their duties at work I am certain their employer will deal with that.

  o 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?

Comment:
The RTO and of course it is regardless of financial viability.

o   Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?

Comment:

A compliant RTO.

No they are no longer an RTO

o   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?

Comment:

Any re-training and re-assessment must be conducted by a compliant RTO in accordance with the Standards for RTOs.

- 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?

Comment:

No only reputable entities with the capacity to comply with the Standards for RTOs should become an RTO.

- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

Comment:

Graduates who have de-frauded by non-compliant RTOs must be adequately compensated according to law.