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

Key consultation areas

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

Chapter 1: Foundation reforms

- ensuring the requirements for VET teachers and trainers provide the strongest platform for high-quality assessment

- ensuring those teaching VET skills are highly competent professionals with high-quality, contemporary skills in assessment.

Chapter 2: Reforms to the assessment of VET students

- assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued

- ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.

Chapter 3: Reforms to the regulatory framework

- improving the detection of poor quality assessment

- ensuring quick action can be taken against registered training organisations (RTOs) delivering inadequate assessment

- managing the consequences of inadequate assessment by removing invalid qualifications from the system where necessary and supporting students if this occurs.

How to provide feedback

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

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

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

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

Submission details

1. Submission made on behalf of: [x] Individual   [ ] Organisation

2. Full name:

    | Sue Flindell |

3. Organisation (if applicable):

    | Positive Learning Solutions |

4. Please indicate your interest in this discussion paper: | VET Practitioner |

    (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   [x] Yes   [ ] No
    website or otherwise be made publicly available?

    a. If yes, do you want your name and organisation (if   [x] Published   [ ] Anonymous
        applicable) to be published alongside your submission,
        OR would you like for only your submission to be
        available and your details kept anonymous?

    b. If no, please advise the department upon submission that you do not want your submission
        to be published or otherwise be made publicly available.

- Is it appropriate for relatively large numbers of RTOs to deliver TAE qualifications or skill sets? Should the number be reduced to a targeted number of RTOs focusing on high-quality provision?

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

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

  - Is recognition of prior learning for TAE qualifications or skill sets granted with sufficient rigour to ensure the quality of student assessment? Should the practice be restricted?

- Are there opportunities to improve the assessment skills of the VET workforce through changes to the delivery and assessment of TAE qualifications and skill sets?

  - Should TAE qualifications and skill sets only be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector?

  - What circumstances would support a change requiring some VET trainers and assessors to hold university-level or higher-level VET qualifications, for example, practitioners delivering and assessing TAE qualifications and skill sets?

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

  - Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? Would this condition help to improve the relevance and validity of assessment? How long would this period of time be?

COMMENT:

As a vocational consultant with RTOs for over 20 years and as a NSW Department of Education consultant in providing training and assessment, professional development, coaching and mentoring to Trainer and Assessors in this field ,I believe this qualification is unique, complex and operates in a multidimensional vocation.

It requires the TAE trainer to not only have strong Educational ability and practice but to have a broad understanding of the Vocational industry in which the student has expertise. At the least, they need to have the ability to learn and adapt their learning methodologies to incorporate the determinates that are required in the industry vocational area. (Eg TAE trainer needs to have a broad understanding of licencing requirements, regulations and legislation in the students industry area.. ie Electrical) . Only then can a TAE trainer assist mentor and support the student in developing and providing learning and assessment practices that are representative of the field in which the vocational student has expertise.

Therefore, my view is that TAE RTOs should have a direct link to IRC and/or SSO in the delivery of the qualifications and abilities in the specific industry area.   They could be supported and monitored by the IRC and/or SSO as well as have the opportunity to assist and provide industry advice and direction. The IRC and SSO would benefit in having a direct link to Industry specific RTOs of which to also gather current industry practice 'on the ground' in order to ensure TP and training and assessment strategies reflect current practice in the industry.

It is not about how many, in a number, but more the correct amount of TAE RTOS to support the specific industry vocational. It must represent choice and versatility

If RTOs specialise in a particular industry area and they have some strong educational qualifications and experience, then I believe it is a worthwhile practice, with ISC and SSO oversight and monitoring, to enable them to train their own staff. Of course still with ASQA final oversight

You should not deny someone RPL. It goes against the Principle of Assessment of 'fairness' . A person may have worked in this area for many years and can demonstrate their evidence in many different ways. It may not be RPL in the complete qualification. Or it may take the form of an Assessment only pathway. The emphasis needs to be on my points above and the rigour in which it is judged to ensure it meets all the Qualification, TP and Rules of Evidence. This I believe is limiting at present. The RPL Assessor needs to have significant skills, experience and expertise to be able to adapt to the various vocational evidence and ensure all components are met.

There is evidence of 'I've been doing this for years ' but the question is more 'But have you been doing it right, and/or do you need to adjust your practice given the constant change in the VET and Industry sector'?
This is where the rigour needs to be enforced.

Increasing the level to University degrees, I believe, will not ensure quality outcomes in delivery. I have a university degree in Adult education which at the time did not contribute further to my delivery and assessment in practice.
Years of practice and experience in many situations and environments has been the largest contributor to my abilities.

Therefore, yes they need to be in the industry, they need to have qualified and highly experienced mentors and coaches, (vocational and educational). They need be subjected to a vast amount of practical experience in their vocational and educational field.

This qualification requires a highly skilled professional that needs to operate over at least a 12-month time in a supervised capacity, with guidelines on hours and criteria. They then become accredited, after meeting all requirements, and must engage in and demonstrate currency in their practice vocational and educational each year (as with the RTO standards) , it is then logged as with other licencing/accreditation of professionals.
This qualification provides the benchmark for the vocational sector. If the trainers and assessors do not have the complex knowledge skills and professional integrity, then all other vocational qualifications will suffer and cracks appear in our credibility with stakeholders domestic and international and ultimately in confidence in the sector.

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:

Yes Yes, Yes.
I am constantly providing professional development to trainers and assessors in developing assessment tools.
I believe it is a major part of the trainers and assessors role in having the ability to interpret, develop and customise tools to meet the needs of the industry. "the real world' This is where we provide some flexibility, incorporate specific industry requirements and overall meet the needs of industry and students.
If this is core and delivered by a TAE vocational industry professional then we may not have the comments from industry….. They are not 'work ready'. 'it is not work related' 'You train them and then I will retrain them'

There is too much reliance on commercial resources that are generic and not customised to suit the specific workplace and in many cases not even valid.

We could spend more time on developing tools that are job related and look more at a holistic training and assessment practice that is representative of the environment in which they operate with the ability to transfer the skills to multiple environments.
At present there is not enough emphasis on the dimensions of competence in assessment tools, particularly. Job-environment and contingency skills. (What if?)

All comments need to be taken on their merits considering the various situations. Only then can we understand the full complexity of the qualification and the outcomes that need to transpire.   My comments are in relation to the whole qualification. If you are referring to the Designing and Developing Assessment Tools unit I believe in all cases it needs to be core, having worked with trainers and assessors of very large RTOs such as TAFE and small private providers.

As far as the packaging of skills sets in the qualification. The value of these skill sets needs to be more heavily marketed to ensure the training and/or assessment roles resemble the persons job role. Eg Enterprise RTO and large RTOs   Pushing a person to complete a qualification that is not representative of their role or future role can see the 'watering down ' of the qualification.

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:
Yes refer to my comments above. Re an Accrediting body and Association and their guiding purpose.

It needs to be a national system and as always will require adequate resources to meet the commitments.
See above comments on links to IRC and or SSOs

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:

Yes agree with all the activities above including professional development programs . These need to come from a central body/bodies (eg like old ANTA or currently ASQA, IRC and or SSO.

They need to have links to national agenda, industry currency and best practice. At present there is no central body to guide best practice and innovation and ensure what is out there is giving the right message.

Bring back ANTA or something like it. It was one of the best organisations to guide practice and promote innovation in the VET field.

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

- Which of the suggested models for a VET professional association would be considered most preferrable and viable in the current VET environment? Model A,B or C?

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

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

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

COMMENT:
Model A represents my thoughts as outlined in question 1 and 4

See details in question 1 as to value.

I think a membership fee is viable for an individual as many work with multiple RTOs and it should be the responsibility of the individual to maintain their professional integrity.

A TAE trainer assessor needs to be mandatory others may be voluntary , would depend on the focus of the association. See my comments on question 1 and links to IRC and SSO

| 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 IBSA capability framework is ideal in which to link a professional association and levels of professionalism. It can also link to a sound learning and development framework of which to offer various professional development programs

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 RTO s engage in robust industry consultation throughout the training and assessment process from a complete quality management perspective, as is good practice, then we would not have specific industry concerns.

Many RTOs do this well, particularly specialised industry RTOS . From quality assurance (initial consultation, strategy and tool design) to monitoring (moderation) and quality review (validation). If there is a good marriage, it will fall into place and the benefits are rewarded for all parties. Therefore, I believe we need to include strong emphasis on industry consultation, and validation throughout the entire training and assessment process. More emphasis in the standards may reflect this by including industry moderation in the practical components of the course before competency judgments are made.

At present, in many cases, industry consultation is superficial and therefore the outcomes do not reflect the quality industry practices they should portray.

Validation, as in the standards, is not a proactive method for ensuring quality outcomes but more of a reactive method, once the horse has bolted. This would only have some value for future quality practice if it is mandated from an external party when evidence of complaints and concerns with specific sectors of the industry emerge. (risks) Such as with ASQA strategic audits where results are having a negative impact on industry credibility

Industry will only engage when there is something in it for them. WIIFM, and money does not create good practice.. (eg funding) Good marketing practices by RTOs to link to workforce development, recruitment, selection, career planning, and in particular how the engagement in training and qualified staff will add to the growth of their companies efficiency productivity and promote innovate strategies. This will in turn grow the RTO.

Linking funding of RTO s and industry more specifically to criteria that reflect these points above will assist in training with real returns. Workforce development funds have been a starting point for this but could be taken much further into traineeship and apprenticeship funding. Funding should not be there to 'prop up a business' as is often said and marketed, it is to help grow a business.

Independent tests and bodies, reassessment, I don't believe is the answer. What is currently existing in regulation or licencing does not always represent industry practice and or best practice. A Test is a rote learning model that does not test a person's cognitive abilities, problem solving, analytical skills, relevant LLN skills, practical abilities, dimensions of competency and the list goes on. It is a stop gap measure that maybe identifies PART of a gap when the RTO has not trained or assessed to the standards required. It also can force an RTO to train to a testing mechanism to get the licence which is very narrow in its approach.

Industry - The VET industry is multidimensional vocation and education. Expertise in both fields is required to interpret the application of TP. Industry (vocational) cannot and should not be expected to understand the educational terminology used unless they operate in both fields and extensively 'on the ground' Large bodies and industry organisations are often out of touch with the real world. In Validation we need to engage the right 'industry' expertise at the right time.

Whether it is designing the training and assessment strategy with industry management to assistance with workplace observation sheets by supervisors in a moderation phase, to finally review of the process for the next course and ensure that industry achieved what it required of its trainees and within the business .

For those on a career path and not currently in work RTOs should be assisting in that process by having strong links to industry providers that can choose to recruit from RTO student cohort.

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:

See question 7 above

- 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:

See question 7

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:
Yes – totally agree with the change in terminology needed.

No there is not a common understanding.

The difficultly we have with units of competency and requirements provided by industry before the person is allowed to work does not represent a competency approach. Eg responsible service of alcohol
Competency – "Consistent application of knowledge and skills to the standard of performance……"
I would argue that not one person can achieve this in a short course such as Responsible service of Alcohol who is not currently n the industry. I would say they are 'job ready'

If you are not in the industry field you are 'job ready'.
You are competent after a period of tme in the field being subjected to most situations, environments and contingencies.

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:
Sorry run out of time to give further points at this time

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:
Sorry would like to comment but run out of time

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:
Sorry run out of time to give further points at this time