



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

Key consultation areas

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

Chapter 1: Foundation reforms

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

Chapter 2: Reforms to the assessment of VET students

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

Chapter 3: Reforms to the regulatory framework

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

How to provide feedback

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

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

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

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

Submission details

1. Submission made on behalf of: Individual Organisation
2. Full name:
3. Organisation (if applicable):
4. Please indicate your interest in this discussion paper:
(i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)
5. Do you want your submission to be published on the department's website or otherwise be made publicly available? Yes No
 - a. If yes, do you want your name and organisation (if applicable) to be published alongside your submission, OR would you like for only your submission to be available and your details kept anonymous? Published Anonymous
 - b. If no, please advise the department upon submission that you do not want your submission to be published or otherwise be made publicly available.

Queensland Fitness, Sport and Recreation Skills Alliance

The Queensland Fitness, Sport and Recreation (QFSR) Skills Alliance is a not-for profit industry workforce development peak body that leads and influences workforce development and innovation in Queensland's fitness, sport and recreation industry. Our vision is that industry operates at maximum effectiveness, through a workforce that is skilled to meet the needs of the industry. This can be challenging for a workforce that is dominated by small to medium enterprises and reliant on its volunteer workforce.

QFSR Skills Alliance has most recently provided industry intelligence to the Queensland Government on the workforce development, skills and training needs and issues of the fitness, sport and recreation industry throughout Queensland. We work closely with industry on skills, training and workforce development issues and provide resources and advice to industry to support their operational needs.

The fitness, sport and recreation industry is diverse and includes non-for profit organisations, small to medium enterprises and volunteer based. Our industry plays an important role in promoting health and wellbeing to Australians. With over 65,000 people employed with the fitness, sport and recreation industry (ABS, 2016), high quality training and assessment ensures that our industry can play an important role in promoting health and wellbeing to Australians.

The SIS training package

The Sport, Fitness and Recreation Training Package is the national framework for skills development for the sport, fitness, community recreation and outdoor recreation industries. It includes nationally recognised units of competency and qualifications to train and assess individuals in a range of skills and job roles.

QFSR Skills Alliance currently has a close collaborative industry relationship with Service Skills Australia (now SkillsIQ), as they develop and review industry training packages, which are currently being updated to reflect current industry practices and meet the new Standards for Training Package.

There are currently 281 registered training organisations for SIS and 719 registered training organisations for SIS10 listed on the training.gov.au website.

Quality in the assessment process

To ensure quality in the assessment process, training packages must meet the skills needs of industry now and in the future. The training package overall design must focus on underlying knowledge, skills and criteria to help shift the focus on the assessment process. The training package design must allow for greater industry involvement. QFSR Skills Alliance supports a model where if industry identifies a need, industry could determine additional assessment requirements and/or participate in the assessment itself. Different types of assessment models could be developed to ensure industry specific application. For example:

- Models of mentoring in the workplace followed by assessment in the workplace
- Direct assessment by industry (rather than the RTO)
- Workplace assessment – a model where the employer performs the assessment

In these scenarios the final qualification identifies who validated the assessment. This provides more kudos to industry which is more likely to increase industry's participation in the VET system. Some problem areas that exist are the shortened delivery which is inconsistent with the course level, the delivery of on line courses used as a means of fast tracking a qualification without industry practical experience.

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:

The Queensland Fitness, Sport and Recreation (QFSR) Skills Alliance welcomes the opportunity to provide comments on the *Quality of Assessment in VET Discussion Paper*, with a particular reference to *Chapter 2: Reforms to the assessment of students*. The responses provided in this template represent a consolidated view of the Queensland fitness, sport and recreation industry.

Consultation with the Queensland fitness, sport and recreation industry denoted mixed opinions as to whether an industry-endorsed externally administered test is a practical solution to increasing the confidence of all stakeholders. Many within the industry believed this approach undermines the role of a Registered Training Organisation (RTO), ASQA, and is inconsistent with the competency based VET system.

One drawback for industry-endorsed externally administered test is that it may require the creation of standardised courses, learning materials and assessments for each training package, thereby removing the flexibility on how training programs can be tailored and be responsive to industry needs.

In addition, a test focuses on knowledge and only some aspects that it can test the applied skill. There may be some aspects of courses that are high risk, where knowledge tests would be beneficial the fitness, sports and recreation industry, such as dealing with young people, dealing with complaints, risk assessments for high risk student activities, injury protocols and where legal procedures need to be known. This is an area where an organisation such as QFSR Skills Alliance can be actively involved in providing advice and support to industry.

Other instances include students seeking recognition of prior learning or recognition of current competency where the student should be able to successfully pass an industry-endorsed externally administered test as part of demonstrating their competencies towards the unit outcomes.

In the past, the fitness and health industry had national testing for personal trainers seeking to be registered with Fitness Australia. Prior to becoming a registered personal trainer, individuals were required to undertake a theory and practical assessment, achieving 80% on each. Nowadays, registration requirements for fitness professionals are the attainment of a nationally recognised qualification and the ongoing evidence of professional development activities (known as Continuing Education Credits) over a registration period of two (2) years.

However, if industry-endorsed externally administered tests are implemented, the results should be made public by the RTO. This would allow an RTO to strengthen their assessment practices and aid the continual development of quality assessment outcomes in the VET sector.

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:

The interpretation of industry varies, and so muddies the discussion when broadly referring to 'industry' role in assessment. As the peak body for workforce development for the fitness, sport and recreation in Queensland, QFSR Skills Alliance regards industry as:

- Peak bodies for sport, outdoor recreation, fitness and community recreation
- State sporting organisations and other similar representative organisations
- Employers
- RTOs
- Schools
- Group training organisations
- Industry skills councils – national and similar state bodies
- Australian Apprenticeship Support Networks
- Unions

It is clear that 'industry' including RTOs, peak industry bodies, employers and national training package developers need to have a stronger, more sustainable long-term collaborative framework to boost the quality of assessment in VET.

Employers have indicated to QFSR Skills Alliance that industry representatives involved in the development of courses (learning content and assessment) would aid in building industry capacity and capability.

Furthermore, it was raised during our consultation with industry, that there is a balancing act in getting industry to participate and engage in training and assessment areas that are needed to boost the quality of assessment in VET. For example, it has been confusing for employers and individuals who are serviced by multiple RTOs for similar training products being asked the same or similar questions on assessment issues but not understanding the outcomes or purpose of the questions. From an employer or industry representative view point these questions from the RTOs are asking the same thing.

One recommendation for the Queensland fitness, sport and recreation industry is to use existing state industry peak bodies (such as QFSR Skills Alliance) that have the capability to facilitate industry engagement to ensure quality assessment in VET. This approach would aid RTOs in the development of courses and other compliance matters, including areas such as training and assessment strategies and industry validation. These peak bodies already have well-established, functional industry networks. Such a model would need to be supported and subsidised through government funding or a fee for service arrangement.

The big issue is that currently providers do their own assessment which creates an immediate conflict of interest. If the implications are serious enough, and external assessment is warranted such as for high risk skill areas and for high risk RTO - then you perpetuate the same problem if the provider seeks and pays their own external assessor. There is a role for a peak body such as ours to manage external assessors.

This model would also allow employers and industry groups to participate in the areas required and/or specialised in, and would ensure industry engagement is appropriately targeted to those that want to be involved and also have expertise to do so.

The lowest level requirement for all providers is that they must have an assessment policy and required procedures aimed at getting reliable and effective competency outcomes. This must be public and audited by ASQA.

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.

- In the above circumstances, something has to be done to improve the quality of overall training and course offerings, and this should not be seen as a cost impost rather making the system more effective.
- 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:

As a peak body for workforce development in Queensland, QFSR Skills Alliance works closely with other peak bodies, industry associations/organisations, employers, individuals and RTOs to ensure that Queensland's fitness, sport and recreation industry has a trained and qualified workforce.

The QFSR Skills Alliance strongly supports an independent validation of assessment triggered by funding requirements, where independent validation of assessment could become a requirement for RTOs seeking access to government funding.

As part of our role within industry, the QFSR Skills Alliance has recently recommended to the Queensland Department of Education and Training (DET) to re-open applications to become a pre-qualified supplier (PQS) under the 2010-2016 User Choice Program and any future User Choice Programs. A key part of this recommendation, was the emphasis to DET that QFSR Skills Alliance would work closely with approved PQS's in Queensland to ensure quality outcomes and real work outcomes for those undertaking training when using government funding. This involvement would build the confidence of those within the industry and government.

QFSR also supports independent validation on a risk based determination i.e. where a qualification is identified as high-risk. The risk factors may vary between competencies, qualifications, training packages and industries.

In particular for our industry, some of the outdoor recreation skills sets could be considered high risk due to the nature of skills involved, judgment of the individual and public perception. Therefore, there could be a requirement for independent validation applying to RTOs offering these skills sets.

Furthermore, if independent validation of assessment is to be risk-based, assessments conducted wholly online is noted as a key factor that needs to be considered within our industry.

The fitness, sport and recreation industry recognises the need for online learning. However research by QFSR Skills Alliance highlights that graduates need more on the job training for better outcomes. The increase of online training and the way assessments are being conducted within the online environment is leading to students being ill equipped to work within the industry.

One recommendation is to target funding towards training that increases on the job training as part of nationally recognised qualifications. This will ensure that graduates in the fitness, sport and recreation industry can get real work experiences and be mandatory assessed for all the practical aspects of a training program.

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:

There is a role for industry to develop resources outlining VET graduate expectations for particular training packages. Employer representatives consulted by QFSR Skill Alliance highlighted a mismatch between industry expectations and the outcomes identified in the relevant training package. Employer representatives were also unclear in understanding VET terminology, in particular the terms ‘competent’ and ‘job ready’.

It could be considered that developing government or industry resources with clearly defined VET graduate outcomes would contribute to consistency and clarification of parties in understanding of the outcomes. However, this would impede the flexible, varied and sometimes innovative models of delivery currently available.

Employer representatives supported the paper’s points on the technical nature of training packages and agreed there is benefit in articulating this as a specific, plain English way in order for industry to understand graduate outcomes.

Ideally, the developers of the training package (such as the previous Service Skills Australia for the SIS Training Package), through consultation with industry peak bodies are better positioned to develop resources on VET graduate outcomes.

As discussed earlier, there is a lack of confidence in the industry with the development and take up of online education. The industry recognises the need for online learning; however lack confidence in the outcomes when a learner is deemed competent, purely from third party reports or video evidence.

To increase industry awareness, one recommendation would be to inform industry through the student’s testamur, on how the student was deemed competent (such as RPL or TTL meaning theory, third party, and logbook). Currently this type of information is only available to RTOs.

Another recommendation is for RTOs to provide a clear, detailed outline of what was covered in each unit of competency on the student testamur, as employer representatives indicated their focus is on what is covered during training and not on unit codes and names.