![Australian Government — Department of Education and Training]

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 .

Submission details

1. Submission made on behalf of: ☐ Individual   ☒ Organisation

2. Full name:

Keith Cowlishaw

3. Organisation (if applicable):

RMIT University

4. Please indicate your interest in this discussion paper:

Dual Sector Provider

    (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:

The TAEIV is considered a threshold qualification therefore opportunities for continuous self-improvement are an important component of ongoing professional development. Our professional development practices at RMIT allow our practitioners to have the skills required to provide well rounded training programs to our students. Professional development is a key factor to shaping our workforce planning and improving the student experience. This ongoing building of practitioner's skills ensures our staff are well equipped to deliver quality training across all our program areas.

Implementing a stringent TAE approved provider list could reduce the amount of RTOs operating in this space and ensure those who are delivering this qualification are able to meet the mandated regulations to ensure the integrity of the program. All providers on the approved provider list would need to demonstrate consistent high quality delivery of the TAE at certificate IV and diploma level.

RTOs that are on the approved provider list would demonstrate capability to correctly assess RPL plus deliver to and assess their own staff. This would be evidenced through the regular auditing on the quality of their delivery and assessment practices.

Removing the option of RPL may dissuade experienced trainers, teachers and learning designers from improving their expertise and innovative teaching practices. RPL is a key component towards accessing vocational education however RMIT agrees that a more stringent process is necessary. An

approved provider list for the TAE plus regular auditing on the quality of delivery and assessment would significantly reduce the risk surrounding the appropriateness of RPL and in-house delivery of the TAE to trainers and assessors.

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:

The TAEIV is an entry level qualification; at this entry point it is important to note that trainers would not typically be in a position to demonstrate the experience required to design and develop assessment tools.

The practice at RMIT is to encourage and support ongoing professional development for all our practitioners; this is imbedded into our workforce planning. Our professional development programs allow us to provide our staff with the necessary expertise required across all levels of practice from teaching through to developing and designing effective learning and assessment tools.

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:

Professional development for education providers is an important factor towards encouraging innovative teaching practices that support student engagement. Victorian providers are able to utilise the professional development services of the VET Development Centre however the costs often present a barrier to staff undertaking PD or spaces are limited due to the financial restraints of the institutions ability to pay.

The Victorian VET Development Centre already demonstrates good practice for PD within the vocational sector and would be a sound building block for shaping a national association. If a national association was to be implemented it must be able to offer a national consistency across vocational education practices for professionals, yet also have a thorough understanding of the state based regulations that impact on delivery in a national VET environment.

RMIT as a large tertiary institution provides professional development to allow our VET practitioners develop their skills. Smaller providers may not have the resources or capability for workforce development of this nature.

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:

All the examples provided above would be beneficial to the improvement of the vocational education sector. If a national association was to be put in place it should be able to provide ongoing support to its members through the monitoring and supporting of practitioner professional development particularly in designing effective assessment practices.

As stated in the previous question the Victorian VET Development Centre currently demonstrates respectable practice and would be a sound building block for shaping a national association. Any national association must be able to offer national consistency across vocational education practices for professionals, yet also have a thorough understanding of the state based regulations that impact on delivery in a national VET environment.

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:

The governing authority of RMIT University is the Council. The Council's prime responsibilities are set out under the RMIT Act 2010 and the Council Governance Charter. In addition the Academic Board is responsible for recommending new programs, regulations and policy to Council and for establishing procedures related to both higher education and vocational education. This academic governance model is aimed at addressing the overall capability of our VET and HE staff through ongoing and supported professional development activity.

Our academic governance model lessens our need for a national association however of the three VET professional association models presented in this paper RMIT would support model B. It has a range of the functions that are currently covered through existing organisations such as the VET Development Centre and the Victorian TAFE Association. These organisations demonstrate good practice in supporting professionals and are strong advocates of the VET sector. With improved financial support from the government model B could draw on the current Victorian models to strengthen their national practice.

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:

Capability frameworks are a good tool in that they outline a model of practice; the gap is in how to support a practitioner to apply that practice in various scenarios. RMIT would argue that a framework is only the first step it must also include the practical application to address the expected outcomes of a skill set or qualification.

Through our workforce planning and ongoing professional development RMIT continues to successfully implement capability frameworks across all our courses. In our case we do not see the need for an association to develop a 'new capability framework'; it would however be of greater benefit to the VET sector if the current best practice in this space was considered.

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:

Through the licensed trades within the building and construction related sectors there already exists an external assessment model which is governed by the appropriate state and territory licensing authorities. This is a sound industry and training provider collaboration model and a very good example of how industry successfully engages in assessment by having a strong understanding of VET pedagogy.

On the other hand, the advanced diploma of oral hygiene and advanced diploma of dental prosthetics is a prime example of an external assessment process taking place in isolation of the completion requirements of the vocational qualification. Due to this misalignment between the requirements of the nationally recognised qualification and the mandated external assessment, undertaken by the Australian Dental Council, an individual is at risk of not securing employment until the external assessment is successfully completed. Whilst there is certainly value in having an industry approved validation process particularly in areas where the job role places people at risk of harm, it seems counter-productive to develop this process in isolation to the nationally recognised qualification.

Therefore RMIT suggests that this be taken into consideration by the government when looking at industry endorsed external testing. It is important to note that it would be difficult to achieve a rigorous external assessment process without an examination format, which contradicts the purpose of a vocational learning pathway. In higher education the external assessment model assumes a one size fits all approach and is often exam based, however successful completion of an exam or test is not an indication of vocational competence.

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:

There seems to be a misconception that 'industry' adds the most value to vocational training for the assessment component only. When in reality the learner, employer and RTO report higher satisfaction rates when all three parties work in partnership throughout the lifetime of the program. This is relevant for employers and existing workers to ensure the program is meeting the expected outcomes as well as ensuring full time class based learners are exposed to industry experiences.

RMIT has an extensive history in working successfully with industry which can be demonstrated through our existing partnerships across multiple sectors. We ensure RMIT programs maintain industry relevance with high employability rates through our Industry Reference Groups (IRG). The IRGs are well-versed in our pedagogical practices as this supports them to be active in reviewing and validating our assessment practices.

If industry/employers where to play a role in validating assessment addressing this capability gap is an important factor, especially in ensuring the integrity of the vocational program. Under the newly formed training package management system the Skills Service Organisations (SSOs) in partnerships with RTOs and Industry Reference Committees (IRCs) would be best placed to address and develop an industry-wide validation plan for assessment. This would improve assessment rigor by assisting industry and training providers to work in partnership when determining and benchmarking competency.

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:

RMIT argues against an independent and external validation assessment process as it would add another layer of complexity to what is already a complex system. An external validation process has the potential to put learners at risk of only being deemed competent based on an employer's expectations, potentially undermining the unit of competency that has been supposedly developed in conjunction with industry (the training package management model).

Validating assessments requires more than just checking if assessments are relevant to industry. It is not appropriate to expect industry to participate in a full validation session, but rather to provide input only on areas that ensure the assessments are valid. Caution is needed when responding in a knee jerk fashion to industry feedback on training and assessment. Employers in particular can have very specific or unrealistically high expectations of VET training outside the scope of the skill set or qualification.

RMIT works closely with all our Industry Reference Groups this is also a requirement of the RTO Standards. We highly value this model of industry and provider validation as it recognises the valuable contribution of both parties, whilst respecting that as a VET provider the staff at RMIT are best qualified to identify the most appropriate assessment techniques. A provider with formal industry engagement processes for assessment and validation will be well placed to determine competence.

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 an ongoing issue with communication and collaboration across the VET sector. Training products must be fit for purpose and meet the expectations of the graduate. Under the prior training package management system there was little opportunity for input from education providers to contribute to the Industry Skills Councils (ISC) understanding of quality teaching and learning practice. By ISCs only working with industry many qualifications lacked the contextualisation needed to ensure consistency with assessment delivery.

It is important that under this new model the Skills Service Organisations (SSO) are able to define to industry what their expectation of graduates should be according to the AQF level. Additionally industry needs to clearly define their 'job ready' expectations to SSOs through recognising that completing a qualification or skill set should not be in isolation to the training provided in the workplace.

Therefore it is common sense that high quality training providers become a key component in the new training package management system. This lack of consultation with providers under the previous ISC model has resulted in qualifications that were not contextualised to delivery in the workplace. This lack of collaboration with training providers by the ISCs has resulted in instances of industry being dissatisfied with the training even after assisting the ISC to develop the qualification.

To undertake training package development work successfully the newly appointed SSOs must seek expertise from high quality providers as well as industry. Therefore, a key factor for consideration here is the importance of including educational expertise in the new arrangements for training product development.

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:

RMIT would not support further increases to the rules and regulations for training providers. The Standards for RTOs 2015 clearly state the rules of assessment, how it is to be conducted and by who. This question seems to assume that solving assessment solves all problems and does not take into consideration that vocational education has traditionally been a stepping stone into work. The solution is in better trained educator's not additional regulation from independent bodies, national regulators or state authorities.

Professional development of practitioners is core to improving practice within the sector. It needs to be consistent across all providers and clearly define the career trajectory against personal goals. Improving practice through supporting practitioner skill development will improve training delivery and provide graduates with valid assessment outcomes. Government dollars would be far better spent on developing transparency on the skills and knowledge required to be a quality practitioner as opposed to prescriptive regulations that inhibit training delivery.

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:

Central to this question is the impact on the student by ensuring they are not penalised. The current auditing process is drastically under resourced in comparison to the number of training providers operating. Due to time restrictions and the mass of providers in the market, auditors are forced to look at common denominators such as basic assessment documentation evidence. This means they are unable to spend time on the actual delivery and assessment practice against the quality of student outcomes. This lack of resourcing is providing the opportunity for a small number of RTOs to consistently underperform.

RMIT would suggest increased resourcing for the regulator to ensure that adequate auditing is regularly taking place across all RTOs. This is crucial to protecting students rather than penalising them for unintentionally choosing a low quality RTO. The regulator needs to be fully implementing its authority against providers who continuously deliver poor assessment and student outcomes. The current RTO registration process needs to be far more stringent particularly in providing evidence of the need for training delivery. An example of this is where there is an influx of providers in the same area delivering the same qualifications; what would be the evidence of need for an additional operator in this market?

- 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:

Cancelling qualifications of students should always be a last resort. Requiring re-assessment of students negatively impacts on their ability to demonstrate competency, particularly in the case of them not being competent in the first place. However if clear fraudulent and inadequate training and assessment has occurred cancelation may be the only option. If this was to occur RMIT would recommend the following options should be offered to students:

- A tuition assurance scheme be established to financially protect students
- Refunds for all fees associated with the training
- Option to be re-assed by another provider with RPL as an option
- Option to enrol in the qualification to complete proper training and assessment through another approved training provider

RMIT notes that this discussion question does not request feedback on what processes a regulator would follow when recalling an issued qualification and whether the government is intending to provide further information on this matter?