# 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:

    | Jodie Badcock |

3.  Organisation (if applicable):

    | Resources and Engineering Skills Alliance (RESA) |

4.  Please indicate your interest in this discussion paper:

    | Industry representative |

    (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.

- 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:**

1.1  RTOs are experiencing that ASQA are already refusing applications for TAE to be added to scope as there are 'too many providers' .  This is an issue as the RTOs are not able to secure technical experts with TAE competency through channels currently available.  A generic TAE qualification completed with an RTO that cannot provide an appropriate context is not to their benefit and does not meet the requirements of the RTOs.  RTOs need to have the capacity to develop their own staff in the context of the operating RTO using current industry specific tools and materials and opportunity for supervised practice and mentoring.  The number of RTOs delivering the TAE qualifications is not an issue – it is more about quality of training and assessment than quantity.

1.2  RTOs should not be restricted from issuing TAE to their own trainers and assessors.  It is often the case that small – medium and specialist RTO's are able to provide more and better opportunities for mentoring, supervised placement and practical opportunities than RTOs putting through large numbers of learners. Trainers and assessors also need to be technically competent in their field of expertise – specialist RTO's are able to contextualise the TAE delivery to ensure learners are working closely with the training package requirements relevant to their area of expertise.  This is critical to the development of persons conducting training and

assessment. They are able to provide the opportunity to work with real tools for training and assessment and evaluate their application and implementation.

1.3 Evidence is evidence. Providing the portfolio of evidence provided in the RPL process meets the requirements of the training package the determination of competency must be allowed.  It is counter-productive to enforce 'training for training's sake' or required competent persons to undertake assessment in circumstances where sufficient evidence of competency has been presented.

1.4 Requiring TAE VET practitioners to have a minimum level of experience would be supported.

Requiring TAE VET practitioners to hold higher level qualifications would be supported at one level above the qualification being assessed ie: Certificate IV TAE practioners must hold Diploma, Diploma level should perhaps have Education / Adult Learning or minimum experience in the VET environment in training delivery, assessment, design, management or compliance .

The practical component of the Certificate IV or Diploma is considered and would be supported although it should be based on a number of occurences related to the competency outcome not time based.

There are a number of considerations related to demonstrating relevant employment history for entrants to the TAE Diploma:
- this would create additional (unpaid) work for RTOs to validate the experience

- time based evidence is not quality evidence
- relevant experience should encompass adult education, education and the VET sector, not just the VET sector

This group would suggest a portfolio of relevant experience and skills in education be required.

General Comments:

- Recent changes to training packages have incorporated Performance Evidence and Knowledge Evidence requirements and additions to the Context and Method of assessment.  These changes have not had sufficient time to be tested and may go a long way towards addressing issues in the quality of assessment
- The issues relating to quality assessment are real but do not apply to all RTOs and therefore consideration needs to be given to adding an additional requirements to the whole sector for the failings of a few
- Currently auditing is systems based which does not identify issues as effectively as an outcomes based model, suggest greater focus on outcomes (ie learners, industry feedback)

- More robust evidentiary requirements in the TAE qualifications and units of competency would go some way to improving quality assessment

- 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:**

2.1 Assessors do not always develop assessment tools.  In some cases the assessment tools are mandated (eg high risk work units of competency) and in most RTO's the tools are provided by the RTO.  It would be better to develop a new unit of competency *TAEASS\*\*\* Apply and evaluate an assessment tool* which could cover understanding the link between the assessment tool and the evidence requirements and performance outcomes of a unit of competency and the principles of evidence – this is what most assessors would be required to do.

The unit TAEASS502B should remain an elective at Certificate IV level as there is variation in the role of the trainer/assessor depending on the size and capability within the RTO.  There are also many units of competency for which assessment tools are not commercially available including newly endorsed units of competency.  This unit has a place at Certificate IV level in order to provide flexibility and career path opportunities for different roles within the VET sector (compliance, instructional design, assessor, trainer).

2.2 In the case of making updates it is the clarity and soundness of the argument that should be considered not just the numbers.  Although majority considerations reflect a broader range of stakeholders and should be heavily weighted.  Key stakeholders may not adequately represent the range of RTOs servicing industry and RTO's should not be forced to join an association in order to have a voice in decision making. There is also a question around who 'key stakeholders' may be.  Are they VET practitioners and industry bodies across the sectors serviced by training packages *or* large providers and other persons largely disassociated from the practice of training and assessment to meet industry competency requirements?

| 3. Discussion questions – benefits and purpose of a VET professional association: |
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| • Is there a need to establish a national professional association for Australia's VET system?<br><br>  – 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?<br><br>• What are the barriers to establishing a national professional association? How could these be overcome?<br><br>• What would be the most useful guiding purpose of a national professional association? |

**COMMENT:**

3.1 The establishment of a national professional association for the VET system has merit.  There is currently no recognised professional development organisation for the VET sector and very little support available for RTOs.

The guiding purpose of the association would be to support the professional development of VET sector practitioners and the quality of VET practice.

| **4.** | **Discussion questions – potential activities of a VET professional association:** |
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- 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:**

4.1 A national association could provide:

- professional services and links to support development of compliance strategies
- a bridge between RTOs and ASQA
- raise the profile of the VET sector and  practitioners
- a forum for raising professional development standards
- professional development around training packages and practice (this was carried out by some ISCs and state VET quality bodies in the past but is no longer)
- maintain a national central register of qualified trainers and assessors and the qualifications they are able to deliver (providing they are sufficiently resources to do so),  similar to teacher registration boards
- an opportunity to create a central register of VET trainers and assessors thereby raising the quality of the sector
- opportunities to comment on policy development and continuous improvement.


Interacting with industry was seen to be beyond the scope of a VET practioners association. This function would best be performed by industry associations for each training package industry group – some of which already exist.  This could be supported through funding support to existing industry groups to provide vocationally specific industry advice (such as RESA, RISA in the resources sector).


4.2 The advantages would be:

- alignment across borders

- reduction in duplication

- a nationally consistent approach to the national training system

- opportunity for practitioners to be involved in validation and a professional network

- opportunity to establish validation networks

- opportunity to promote model practice (best practice)

- recognition of the VET sector at a national level

This process would not necessarily replace professional development through other groups/associations  or PD organised by RTOs for their own staff.  There would continue to be a need for:

- advocacy

- industry intelligence

- industry specific practitioner associations/service providers.

Ideally these organisations would have input into the agenda and priorities of the VET association.

4.3 There would be benefit in establishing a new body with a fresh perspective to form the association although organisations like the Vocational Education and Training Industry Group might be well positioned to perform this role.

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

No comment provided.

| 6. Discussion questions – capability frameworks: |
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- 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:**
No comment provided.

- 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:**

1.2  External testing is not a practical alternative to ensuring VET graduates are competent. Assessment needs to be based on a portfolio of evidence aligned to the competency requirements. A single external assessment may validate knowledge but not the practical application of skills and knowledge applied to the requirements of the work environment . There are very few competencies where a 'test' alone is an appropriate assessment method.

A more effective method would be to develop assessment tools at the same time a unit of competency is developed.  This would ensure tools reflect performance and knowledge evidence requirements, are industry endorsed and reflect the range of suitable forms of evidence that might meet industry requirements. The assessment tool would then provide the minimum level of evidence required for assessment with opportunity for contextualisation.

2.3 – 2.4 A pass/fail dichotomoy is not consistent with a competency framework.  Any additional assessment would only be appropriate to determine a requirement for gap training.

2.5 Publishing assessment results would not promote equity and engagement in VET an therefore would not serve the public interest.   RTOs may be forced to screen students out of training based on their capabity to achieve competency within their delivery and assessment methodology rather than providing individuals with the opportunity to participate in training and work towards achieving

competency – which still has benefits for participation and engagement at the individual, industry and workforce levels.

## 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:**

1 Industry participation in validation of assessment is critical although there are constraints around active participation in the process especially for SMEs. (small and medium enterprises). RTOs/Assessors cannot develop effective assessment instruments and determine competency without ensuring a clear understanding of industry expectations of a competent person. This is defined to some extent in the training package but tools used to build the portfolio of evidence must also be subject to industry scrutiny.

The definition of *industry* must involve persons with significant experienced in the role and/or actively supervising/managing the role to ensure currency and expertise of subject matter experts. In the past ISC's have provide industry experts with the guidance required to participate in the development of the competency framework and tools for training and assessment. This has been through active participation in the development and review processes of the training package.

In the resources sector, there is evidence RTOs actively engage with industry to conduct validation of assessment tools and this process has involved ensuring industry subject matter experts have a clear understanding of the competency framework requirements, training package requirements, evidence requirements and the purpose and use of assessment tools. The process has been facilitated by an independent VET consultant. Industry subject matter experts also provide first hand observation evidence to ensure performance is at the level expected by industry.

8.3 An effective strategy enables industry subject matter experts to participate in the determination of competency by ensuring the principles of evidence are met in line with the operating enterprises operational requirements while the VET practitioners (RTOs, independant consultants) ensure that due process is followed in line with the RTO standards and training package requirements. This

ensures industry can maintain a focus on productivity, efficiency and safety which encourages an ongoing commitment to VET.  The question to subject matter experts in the validation process needs to be "Does the portfolio of evidence available provide you with the information you need to determine that the individual is able to apply the skills and knowledge required  to carry out the tasks required – as defined in the unit of competency - at the level required in the workforce?' . With effective guidance and facilitation by a VET professional, subject matter experts do not need additional training to make this determination.

## 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:**

9.1 Industry validation of assessment needs to focus on assessment tools with *assessment moderation* to occur at the level of the individual to ensure consistency in the application of the tools. Moderation would occur within / between RTO assessors depending on the size and capability of the RTO.  The form of moderation could be determined in the RTO registration process and should focus on priority competency areas as defined by industry and based on a risk assessment conducted at the time of development of the unit of competency (may need to be applied retrospectively for existing units of competency).

An effective strategy may be to develop RTO clusters and funding to support the facilitation of annual moderation activities in priority areas as determined by industry and some random moderation to drive quality across the board.

9.2 Compulsory external assessment introduces undue burden for learners and assumes failure of the system to ensure students are competent. Any reassessment activity should be a moderation activity based on the portfolio of evidence used to make a determination of assessment not the individual being forced to undergo additional assessment.

A secondary assessment process is likely to only focus on knowledge and not the application of skills and knowledge to carry out tasks at the level required by industry and would therefore not be a useful methodology.

It would be better use of resources to adequately resource ASQA to carry out a schedule of audits to ensure RTO's are using assessment tools that have been validated and are supported by industry (representative of businesses that carry out the tasks being assessed) and validation in the form of **assessment moderation** has been carried out.

There are licenced trades and occupations that require a technical knowledge test (eg Mine Deputy, Mine Manager, Open Cut Examiner) carried out by regulators and this process is necessary as it serves a particular purpose in ensuring compliance with regulatory requirements in the jurisdiction where it applies. The electrical trade Capstone assessment also provides a wholistic assessment and is a required by regulators for graduates to obtain a licence. This is not administered as an external assessment but a quality controlled assessment tool administered by RTOs with clearly defined knowledge and performance requirements.

| 10. Discussion questions – industry expectations and graduate capabilities: |
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- 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:**

10.1 There is clearly a need to ensure that the focus of assessment is on determining competency and that one critical aspect of competency is determining that a person is able to apply skills and knowledge to carry out a task at the level required by industry. There are, unfortunately, many VET practitioners who appear to be 'stuck' in a curriculum mindset and do not associate competency with performing at the level required in the workplace. This is often because delivery methodologies do not encompass workplace requirements and focus on just skills, just knowledge or a combination of the two but not in the context of the work environment. There is a fundamental shift that needs to occur within the VET sector to address this. Industry understands this better than many VET practitioners and ASQA auditors.

Professional development within the VET sector is critical to addressing this requirement. This would need to be facilitated from a national perspective and driven through industry specific (training package) programs aimed at:

- VET practitioners
- RTO administration, management and compliance officers
- ASQA / STA auditors
- Industry bodies and operating businesses
- Developers of assessment tools and training materials

With regard to VET graduate expectations for particular training products – this is currently being undertaken, in part, through the implementation of the Training Package Standards for Development and revision of training package evidence requirements. These changes have not yet been tested.

There is a need for Government to support and promote the changes in requirements and this could be done through SSO's under the guidance of ISCs. As a minimum, it would need to involve nationally consistent professional development opportunity for the target groups identified above aligned to industry specific training package requirements.

If an professional body is to be established it may also fall to this body to facilitate the program of professional development.

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| 11. Discussion questions – evidence of assessment and graduate competency: |
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- 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:**

1. Changes to training package assessment requirements may address this providing RTOs are using assessment tools clearly mapped to the evidence requirements (performance and knowledge evidence). There would be benefit in including a requirements evidence of industry validation of the assessment tools in use – such as evidence of consultation in development or review.
2. It is unlikely that a requirements to retain evidence for longer would not improve quality of assessment.
3. Evaluation outputs could be implemented in a cost / labour effective manner by focussing on evidence of *assessment moderation* conducted in accordance with a schedule determined by a risk matrix for competencies identified by industry as high priority and 'random' high use units of competency. RTO's could be allocated to a moderation cluster (or self select a cluster) for this purpose. ASQA is the appropriate body to oversee this process provided they are adequately resourced to do so. RTOs could co-ordinate the facilitation and conduct of moderation activity based on a standard template provided by ASQA.
4. Recognising training only organisations within the regulatory framework would be very difficult to manage as training delivery methodology requirements are not stipulated and would therefore be very difficult to enforce/regulate. Training only organisations are often not RTOs because they focus on one aspect of an industry requirement that does not necessarily equate to a competency outcome. Industry requires access to these services but they are not equal to the services of an RTO focussed on providing a framework to support the development of competency and the assessment of a portfolio of evidence with a view to determining competency.

- 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:**

1. Focus on requirement to ensure industry validation of assessment tools and assessment moderation in accordance with requirements established through a risk assessment in industry identified priority units of competency.
2. Current penalties would be sufficient (suspending RTOs pending improvement). The focus should be on supporting learners who have not been assessed adequately to develop their portfolio of evidence and/or address training and development needs.
3. The size of the RTO and the number of students does matter any issues would be systemic with substantial financial gain in a large RTO and more difficult to remedy than in a small RTO that may be able to response quickly and appropriately to redress any shortfalls in assessment practice.
4. The regulator must have the authority to suspend RTO operations for repeat offenders and issue orders for action to support students affected. Providing there is industry stakeholder consensus that the evidence used to make a determination of competency is not appropriate repeat offenders must have scope repealed. The definition of repeat offender could be based on:
   - identification of first non-compliant assessment/s – issued with opportunity to redress
   - identification of second non-compliant assessment/s having occurred after opportunity to redress has been given - suspension of activity related to competency/qualification pending investigation
   - following investigation - permanent removal from scope of registration if ASQA direction has not been actioned
5. There is benefit in regulators disclosing aggregated information relating to
   - No of audits
   - Issues identified
   - Corrective actions successfully implemented (provide RTOs with guidance)

- High risk qualifications and audit priorities

## 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:**

In order to support students, reassessment requirements should be:

- funded by the RTO under investigation where possible
- if not conducted by an alternative RTO, moderated by an assessor from another RTO
- treated as an RPL/RCC assessment / gap analysis
- be supported by a funding allocation to address any gaps
- consider issue of a statement of attainment where applicable (ie if not all qualification requirements are met but some unit of competency requirements are met)

A tuition assurance fund cannot be funded by RTO's as this is introducing an undue burden on RTO's doing the right thing to compensate for those that are not.