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 terms and conditions for public submissions.

Submission details

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

2. Full name:

    Ruth Walker

3. Organisation (if applicable):

    Independent Assessment Validation Services

4. Please indicate your interest in this discussion paper:

    VET Practitioner

    (i.e. as a student, VET practitioner, RTO, third-party provider, peak body, business, industry representative, regulator or other government agency or community member)

5. Do you want your submission to be published on the department's website or otherwise be made publicly available? [x] 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? [x] 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:

I do not believe that the **number of RTOs** who deliver TAE is the main issue for concern. The issue for concern is the quality of deliver. If all 5000+ RTOs registered with ASQA could demonstrate that they deliver quality TAE provision there is no reason why some should be restricted from delivering – this would in fact create an unfair commercial advantage.

The issue is to ensure quality provision.

There are some consideration in favour of limiting the number of RTOs who deliver TAE, such as:

- Considerations of the capacity of the Regulator to manage the registration and associated review of the quality of training delivered by RTOs who deliver TAE qualifications
- Considerations of increased competition and commodification of the qualification which can have perverse implications for course duration and cost.

The Standards for RTOs 2015 and ASQA directions already contain some restraints regarding who can deliver (Those who have been registered continuously for 2 years and have undergone independent validation of their assessment system). I do not believe that extending these restraints will necessarily improve the quality of delivery, they will only deter applicants and therefore reduce

the number of RTOs who deliver, but this provides no guarantee that the smaller number of RTOs will be of higher quality.

If an RTO is delivering and assessing a quality product there is no reason why they should not provide **certification to their own trainers**. If their product is sound, this will protect the process from potential abuse. If RTOs were to be restricted from delivering and assessing their own staff this would set a precedence that would have serious implications for enterprise RTOs.

If the quality of assessment is sound, there should be no need for special rules around assessment in TAE. This applies to **RPL** assessment, which is just another form of assessment.

While TAE is a mandatory qualification that regularly undergoes updates it would be unfair and unreasonable to out rule RPL as a method of achieving the qualification.

The **person delivering TAE** should definitely have a number of years experience in the VET industry and a qualification in Adult Education at a higher level than that being taught. The requirement to hold a qualification in Adult Education at a higher level than that being taught is already being a requirement of the SRTOs 2015 to come into effect in 2017, it would be desirable for the duration of experience in the VET industry (industry currency and experience) to be more clearly specified by either the training package or the standards. Currently a person with the appropriate qualification and current experience would meet the requirements of the standards, even if that current experience were very limited (i.e. of short duration). A person with a higher-level qualification in Adult Education and a number of years industry experience in VET would help to improve the quality of the TAE qualification being delivered. While some Certificate IV qualified trainer delivering in certain circumstances (for example a trainer of First Aid) may not have a high demand a great depth and breadth of knowledge of learners and learning styles, others, such as those delivering foundation skills courses to youth at risk or long term jobseekers. Therefore the trainer of the Certificate IV qualification certainly should have this depth and breadth of knowledge and experience in order to provide a quality product that can address the needs of learners who will be preparing to work in diverse VET training and assessment environments.

I have no doubt a **practicum component in the TAE** would improve the skills and knowledge and eventually the quality of training and assessment conducted by graduates of TAE courses. However the practicalities of implementing a practicum component are concerning. For instance, in which VET courses would it be appropriate for a practicum student to be delivering training? What would be the implications for the VET learner doing the course being taught be a TAE practicum student? The VET industry has very much a "just in time" and targeted training approach. As a student within this system I would not want to be subject to learner teachers.

Perhaps one way a **practicum** could possibly work would be if the TAE student were to do the practicum at the end of their training, after they have done all the training delivery activities currently required by the qualification, which are often done in a simulated enrvironment. This is the point at which they are currently deemed competent. Rather than graduating as competent at the point in their TAE course, the learner could be required to complete an additional practicum before being deemed competent. This could perhaps be considered as a licencing arrangement. Critical to this approach would be for the VET industry, those who employ TAE graduates, to take responsibility

for providing full supervision and mentoring to TAE graduates in addition to the RTO completing the assessment at the end of the practicum period.

The appropriate duration of the practicum and the employment and remuneration status of the TAE student during the practicum is also a matter of consideration. Clearly a student with responsibility for providing training to a group of VET students would expect remuneration for their services, yet from the RTO point of view a student undergoing practicum would not attract the same income as a fully qualified trainer. The duration of the practicum would have to be such that the student gets to experience and demonstrate both delivery of training and conduct of assessment. This may not necessarily be with the same cohort of students. For instance the TAE student could deliver training to one group of learners who are then assessed by a fully qualified assessor. Similarly the TAE student could perhaps conduct assessment (under supervision) of another cohort who have been trained by a fully qualified trainer.

- 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 Certificate IV in Training and Assessment is considered by many industries and employers as a baseline qualification for anyone delivering training or conducting assessment. It is often the case that employees do not require the full qualification, rather they require a TAE skill set. As long as industry remains captivated by full qualifications and disregards skill sets it would be inappropriate to include the TAEASS502B within the Certificate IV TAE.

When I was a trainer of the then TAA40104, which had the TAAASS403B Develop assessment tools as a core unit, I had a student who was a trainer with the Fire Department. He was a successful firefighter and trainer, yet he lacked the literacy skills to be able to achieve the TAAASS403B. His literacy level did not impact on his ability to perform the role of trainer and assessor in the Fire Department as all assessments were conducted using learning and assessment materials provided by the department. There was no workplace requirement for him to develop these materials himself. Interestingly his literacy levels did not impact on his achieving the validation unit (TAAASS404B). He was very capable of pointing out the deficiencies of other people's assessment materials, he just did not have the literacy skills to write assessment materials himself. A very challenging situation was created because his organisation inappropriately required that he have the full TAA where it included a unit over and above the requirements of the job. His inability to achieve this unit meant that he might lose his job.

I believe there are many situations where workplace trainers are using materials developed by others and they do not need to develop assessment materials themselves. It would therefore be inappropriate to include the TAEASS502B unit as a core unit, at least while industry remains married to the idea of the full qualification as the benchmark of a trainer.

When **making updates** to the TAE it is not appropriate to go by majority considerations. This creates unworkable situations for those who are different. Majority influence has resulted in a qualification that is designed to suit the needs of classroom teachers in large institutes. The qualification should also meet the needs of enterprise workplace trainers and vocationally competent peole who want to be able to share their expertise and work skills. Specifically, the group based learning unit should not be a core unit.

Another cultural change that is really important here is that employers (and associated awards) should be mindful that their employees who are trainers may not need the full qualification. In this way the use of skill sets as the qualification is currently designed should allow for the flexibility to meet the needs of minority users.

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:

The blossoming of a number of organisations who's focus is to provide advice and professional development to the VET industry is a clear indication that there was a **need for a professional association for VET** but perhaps that need has been met?

The **barriers** to establishing a national professional association would be:

- The fact that it would destroy those businesses such as VELG and ACPET who have emerged to fill this void.
- If a national professional association were to be established, who would bear the cost of association membership? In today's casualised VET workforce it is likely that the trainer who is already underemployed with no job security will not be adequately supported and will end up bearing the cost of membership and any associated continuing professional development requirements.
- Differences in awards and working arrangments between the States and Territories
- Management of a national association

The most **useful purpose** of a national professional association would be to licence trainers and assessors after they have completed their practicum or probationary period and to provide or approve continuing professional development programs/courses/workshops and a CPI system.

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:

No comment provided.

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

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

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

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

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

COMMENT:

Are model A and C mutually exclusive? Could they work together with a national framework that is managed by the State Education Departments?

I believe Model A is the best model as it does not disadvantage those organisations that have built their business around the void that has existed in professional development and guidance for VET staff. Model B would be very detrimental in this regard.

If this system were to be established, membership should certainly be mandatory, but careful consideration would need to be given to who would pay for this membership and continuing professional development.

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:

I think the IBSA VET Capability Framework has enormous value and RTOs should be encouraged to use it.

This would require more workshops to educate RTOs in its use.

As a project conducted by Cooperative Learning Limited in 2012 we interviewed managers and trainers regarding their perceptions of professional development and performance management and the need for a quality teaching framework. I am attaching the final report for your consideration.

Cooperative Learning Limited is a collective of Community Colleges (ACE providers) in Northern NSW. The study found that performance management of trainers and assessors was ad hock. Professional development was provided, but mostly focussed on compliance issues unless the trainer had a particular passion for some professional development. Trainers were very supportive of the idea of a quality framework to guide their self assessment, performance management and professional development goals.

The following year, 2013 we trialled the IBSA VET Capability Framework using a survey monkey approach to allow trainers and assessors self assess against the framework. Individual colleges were then encouraged to use the findings to design their professional development calendar.

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:
No comment provided.

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:

Yes, please define industry. As a practitioner in RTOs and an auditor with ASQA this has been a vexing question – does an employer represent industry?

Assessment is a specialised skill and it is rare that one can find an employer or industry rep who can understand the process of assessment validation as it is currently practiced. What needs to happen is for more guidance to be given to RTOs as to how to engage industry in the validation of assessment decisions – and where evaluation and validation overlap. Industry and employers are best used in validation to tell an RTO if a graduate has the skills required for the job, so long as there is agreement about what is expected for an employee in a particular job role and how that relates to the AQF level of the relevant qualification.

Another avenue is to engage industry in validation is to target to those industry representatives who do have an understanding of assessment such as those who have been involved in developing the training package in the first place. Perhaps with some sort of model similar to the old ANTA Approved Training Package Materials Tick.

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:

Annual independent validation of the assessment system including a statistically valid sample of assessment judgements should be encouraged for all RTOs but I think required only for some RTOs based on a risk factors.

Such risks factors might be: complaints from students or industry; turnover or qualifications issued; AVETMISS anomalies such as 100% completion rates or very poor completion rates without adequate explanation; high risk industries; courses of short duration.

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:

Perhaps there could be some synergy between award wage levels and AQF qualification levels? This is a language that employers and industry already understand. So in the Garden Labourers award, a level 1 employee could be expected to have a qualification at AQF Certificate I working towards Certificate II.

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:

The current standards have quite proscriptive requirements for assessment. They have very little regarding the quality of teaching.

I think there should be more professional development to support RTOs in meeting the SRTOs 2015 validation requirements. If this were being done effectively assessment practice would improve.

Currently many RTOs have no understanding of the new requirements for validation.

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:

ASQA could introduce an new type of audit where the audit could focus on conducting validation of assessment judgments in RTOs. That is, reviewing the RTOs compliance with clause 1.8 by conducting validation of a sample of assessment judgements rather than just looking at the assessment tools. The risk based model could inform the selection of RTOs for such audit attention.

Initially as a professional development offering, ASQA could trial such audits with volunteer RTOs with an understanding that the audits have a continuous improvement focus rather than a punitive audit outcome.

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:

No comment provided.