



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

Key consultation areas

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

Chapter 1: Foundation reforms

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

Chapter 2: Reforms to the assessment of VET students

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

Chapter 3: Reforms to the regulatory framework

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

How to provide feedback

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

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

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

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

Submission details

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

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:

- 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?

Reducing the number of RTOs will perhaps enable ASQA to assign resources to auditing the TAE delivery and assessment practices more closely. However, this is a matter for ASQA and the funding bodies to decide. Theoretically, RTOs that are approved to deliver should all be operating at a similar standard as we have national standards for RTOS and is ASQAs job to ensure that these standards are upheld!

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

It would be good practice for this requirement to occur. However, it may cause problems in remote parts of the country. Perhaps it could be imposed but with some exemptions. Or perhaps there could be a requirement for an independant assessor to be involved in assessing student work.

- 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?

Such restrictions have been placed on the issuing of qualifications in some industries including the security industry in NSW and for units such as RSA (NSW). The quality of the training in these area is still questionable so it begs the question – is it the RPL process or the ability of the RTOs in question to adequately assess the competence of a student using any form of assessment? That is, the overall approach to training and assessment of an RTO should be examined and monitored not just the RPL process.

Overall, it goes against the assessment principles to mandate such a rule and does not allow for trainers with experience but no qualifications to gain a qualification. So no I do not support this suggestion.

- 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?
 - Probably, although a specific time period would be difficult to define and it is not just about time – success and ability in training and assessment is a very individual thing. However, I do support the notion of a period of workplacement prior to final issuing of the qualification.
 - 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?
 - None, university level qualifications are not the answer and in fact they may be inferior with regards to the vocational qualifications because they are theoretical and include very little opportunity for practical application of skills and knowledge.
 - Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?
 - Yes this would be helpful. At least 100 hours of workplace practice over a 6 – 12 month period and accompanied by a requirement to report to a mentor and develop a portfolio. This should form part of the assessment requirements. This would also help boost the overall hours – RTOs should be made to comply with the Volume of Learning requirements. The workplace component would be an important part the training and assessment program.
 - 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?
 - I believe that this is essential and in fact I believe that entrants into the Cert IV should also demonstrate that they are employed in a training job of some kind also. Otherwise it is

difficult for them to apply their skills and knowledge during the training itself. From my experience students who are not currently working in a training role find it very difficult to succeed in the TAE. I think employment history should not just be based on time but also on the type of experience. It should be current and it should be relevant.

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:

- 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?

This unit was core in the Certificate IV in Assessment and Workplace Training and in the Certificate IV in Training and Assessment. It was removed when the TAE was brought in. Some argued that the average trainer does not need such in depth knowledge and skills, others argued that they do. I personally do not understand how a trainer can work effectively if they do not understand the fundamentals of competency based assessment and how to design and use an assessment tool effectively. If we think about this in terms of the dimensions of competency – when we train someone to perform a task, they need to know how the task fits into the overall role, they need to know what can go wrong, they need to know how to transfer the skills and knowledge and they need to know why the task is performed in a certain way. Apply this to the training and assessment role.

Is it enough to:

- teach our trainers just how to train and how to administer an assessment without teaching them how the assessment aligns with the unit of competency,
- how the training provided must enable the student to be able to complete the assessment, and
- what the consequences are if aspects of the task are changed etc.?

No, of course not, because if we allow this to happen we do not consider the dimensions of competency when designing the trainer qualifications and the outcome must be that they are not fully equipped to perform both a training and assessment role in the workplace.

Unfortunately, from my years of training and my years working as a consultant in many RTOs I find that very few trainers fully understand the importance of good quality and well designed assessment

and they struggle to apply the principles of assessment and rules of evidence to their assessment practice. So yes bring back this unit. Also review the requirements for competency in this unit i.e. assessment requirements and tie all this into the period of mandatory workplace mentioned in a previous question. A workplace supervisor who has demonstrated skill and experience as an assessor can work with the student to develop the experience required.

- 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?
- No, see above.
- 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?

All stakeholders should be canvassed during updates to the TAE.

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:

- 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?

Professionalisation of the sector would assist in raising the standards. The attitude towards the VET trainer role is often that it is an easy profession, an easy path to retirement, something you don't have to prepare very hard for etc. We see people move out of their industries or move from being University lecturers into training roles, assuming that training will be very easy. Many of them do a quick TAE, ignore what they learn and just continue to teach the way they have taught in the past or the way they themselves have been taught – predominantly this is in a didactic way with a minimum of opportunity for practice or interaction during learning. Attitude towards assessment is similar with trainers expecting RTOs to provide the assessments for them to use and RTOs providing simple, knowledge based assessments that do not enable assessment of skills and application of integrated skills and knowledge.

Whilst there are requirements for trainers to maintain currency and participate in professional development it is the RTO that monitors this and there is of course room for error. There is also a tendency of the trainers to resent the requirement if it is being insisted on by the RTO. It also requires a great deal of effort on the part of the RTO to monitor and keep up to date all of the staff files with regards to PD and currency. This requires a significant cost on large RTOS.

I believe that all educators should be held responsible for their own professional development and currency and that this should be related to their own professional journey but also aligned to the requirements of the organisation. As educators we should always be learning and we should also strive to maintain an interest and indeed a passion about best practice education – if we cannot do that for ourselves how can we do this for our students?

So how can this be achieved- I would suggest a national professional association, a set of standards for trainers, a requirement for CPD for the practitioner to maintain membership and a requirement stating that the individual can only work in the VET sector if they are a current member of the association. Does this require government funding? If the government would like to raise the bar in terms of the attitude people take towards training and assessment in this sector then yes, perhaps. There are teaching standards in the secondary school sector but none in the higher education sector i.e. university sector so the message is not consistent. Why not look at funding teaching standards across the whole of the AQF so there is consistency of expectation and equal importance placed on the profession of teaching across all sectors.

I think the notion of government funding to establish processes that will raise professionalism in education and raise the bar in terms of expectations of the qualification and requirements for CPD is a positive move.

It would also be helpful to include the range of professional roles that exist in VET and not just focusing membership of the association on trainers and assessors. Roles such as compliance officers/managers, RTO managers should also be included.

- What are the barriers to establishing a national professional association? How could these be overcome?

We are a nation of States and the education system is different in each state. We may have national standards for RTOs but two states choose not to participate. I believe a national requirement for registration as an educator is a good idea but there could be more than one association. Look at the medical profession – practitioners will belong to associations that are relevant to their specific field but to practice medicine they must have a Medicare provider number. They must satisfy CPD requirements but it is the job of the association to determine what that CPD requirement is and how it will be monitored and recorded. They then report to the government on the currency etc of their members.

Another barrier to participation in a professional association for VET professionals could be the lack of specified qualifications required to manage an RTO. The criteria therefore for membership for VET managers will be difficult to define.

What would be the most useful guiding purpose of a national professional association?

I am not convinced that we need just one national association, as described earlier there are precedents from other professionals that would suggest that more than one association could be established. However, I believe that establishment of professional associations would be beneficial for the sector and help to set the standards of professionalism for trainers and assessors in the VET sector, to monitor the membership and provide accreditation for trainers and assessors.

This must be about quality, it must be about raising the expectations across the sector with regards to qualifications and ongoing professional development for trainers and assessors. The association should also liaise with regulators and industry bodies to ensure that they are recipients of the latest information that is relevant to the sector to keep members informed. The association could also be a link to professional development activities for members.

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?

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I am not convinced that we need just one national association, as described earlier there are precedents from other professionals that would suggest that more than one association could be established. However, I believe that an association or number of associations should perform all of the above activities.

- 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? I am not convinced that we need just one national association, as described earlier there are precedents from other professionals that would suggest that more than one association could be established. However, if existing associations were to be used going forward it would be helpful to establish some overarching principles or standards to ensure consistency of purpose.
- Are there any existing organisations that could fulfil this role?

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:

- 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?

Model A is the preferred model (refer to my previous comments). This allows oversight and standardisation with flexibility. Existing associations may be required to adjust their mode of operation but consistency of practice would be assisted through establishment of national standards and accreditation processes.

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

Lifting the expectations of trainers and assessors, providing a central point of information, consistency, accreditation etc.

Professionalisation of the management of an RTO

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

The onus should be on the individual and so the fees should be paid by the individual.

I think a professional association is sustained through the value that it provides to its members. Members should receive benefits such as: recognition of skills – legitimising their professional skills, provision of information, opportunities for networking and collaboration, career support & opportunities, access to professional development & mentoring.

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

Mandatory

I think membership should be broader than teachers and trainers.

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:

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?

The use of capability frameworks is to be recommended. Whether or not the existing ones are useful going forward remains to be seen. However, the capability framework for this sector should not be for trainers and assessors alone.

One essential part of a capability framework for the sector must be a leadership framework. At one stage there was a proposal on the table for RTO managers to hold a management qualification. This proposal was not carried forward into the current legislation and standards so we are left with a sector that requires trainers and assessors to hold qualifications and adhere to standards regarding professional development but no requirement exists for owners, leaders, managers to hold any relevant qualifications. Nor are their requirements for administrative/business or compliance staff to hold any qualifications. If we are to raise the level of professionalism of the whole sector then we must look at the collective skills and knowledge required for delivering a quality product i.e. quality training and assessment and quality outcomes i.e. improved student outcomes, ongoing and productive linkages with industry and the community etc.

- Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

There is an opportunity to develop frameworks but if there is an unwillingness to adopt these frameworks and no external pressure towards requiring trainers and assessors and RTOs to utilise the standards then the effort going into development will be wasted. What has happened with the capability framework developed in 2011? Nothing.

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:

- 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?

Please see my answer to the next question.

- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment?

In answering this question I will reflect on observations made during the 15 years I have spent working in the sector. My comments relate to factors that impact on the conduct of assessment:

- Competency based assessment is a logical process and if it is taught well, trainers and assessors should be well equipped to assess students. However, **most trainers/assessors** that we meet in RTOs do not know how to design and administer compliant assessments and they do not know how to conduct moderation and validation. When preparing for training and assessment, trainers should start with the benchmark and design the assessment processes and then design the training – the training experience should enable the student to meet the assessment requirements. This is a practice that is not widely understood and not typically implemented. Typically, commercial assessments are purchased, trainers deliver content according to the time allocated to them and the training and assessment are not necessarily aligned.
 - Suggestion: go back to basics in the training of trainers and assessors and monitor their performance. (See previous comments regarding workplacement and practice.)
- Unfortunately, even in the situation where training and assessment processes and resources are well designed, the RTO (in some cases the industry body) does not provide sufficient opportunity for the trainers to implement these processes in an appropriate manner. Good

assessment practices must be based on the Principles of Assessment and Rules of Assessment and should ensure that Training Package requirements are met. However, the other factor that is in play here is cost! In the commercial training sector the cost of assessment is always pitted against the completeness of the assessment process. Another key related factor is the marketplace – what are other RTOs doing, how long are equivalent courses in the market, what are the expectations of industry and what are the expectations of the individual client.

- Suggestion: A fair playing field is required in terms of auditing to reduce the unfair competition that results from RTOs offering courses in short timeframes. Consistent implementation of the Volume of Learning requirement should assist with ensuring that adequate time frames are applied to enable quality training and assessment practices to occur.
- Since I first began working in the VET sector in early 2000 I have noticed a dumbing down of the connection of the training sector with the workplace. My first training qualification was called a Certificate IV in Assessment and Workplace Training. This qualification was replaced with the TAA – all mention of the workplace was removed and the resulting qualification became less relevant to trainers in industry. There was also a sense that the sector wanted to lift itself away from a perception that it is only about low level trade qualifications i.e. to remove this stigma and allow better recognition of the higher level qualifications such as Diploma and Advanced Diploma. This shift resulted in a focus on information delivery as opposed to practical training and the requirement for practical assessment. Also, referring back to the Cert IV AWT – there was a great deal of emphasis placed on providing opportunity for practice and, in terms of assessment, importance was placed on assessment development and the trialling of assessments prior to their use. The trial was not just by the assessor but also by someone who had knowledge of the training and the industry. This concept of trialling is not spoken about in these terms today and the emphasis on practice is no longer present in many RTOs, particularly with the recent push towards online learning where there is little opportunity for application of skills in any way.
- Suggestion: The sector should refocus on the industry/workplace requirements, ensuring that all students are assessed on the application of skills in the workplace or in a simulated workplace. Industry could become involved in the design rather than just the validation of practical assessment tasks.
- I believe that there are a number of issues with assessment in areas such as business and leadership i.e. many of the generic qualifications in the Business Services Area, because students may not necessarily be linked to an industry. Practical assessment in online situations and in CRICOS colleges is very difficult because the RTO must simulate a business setting to enable adequate practical assessment. Workplacements are not easy to arrange and where the student is undertaking training at the Cert IV level or above, the requirements of the units dictate that the student must take on leadership roles and conduct high level tasks – this is not easy to facilitate during a workplacement.
- Suggestion: Should these qualifications exist in the VET sector if they cannot be adequately assessed? Should they only be delivered and assessed where a student holds an established work role or approved traineeship that will fully support practical

assessment in a realistic work environment? This requires a serious commitment from industry and strong partnerships between industry and the training industry.

- In all reality RTO engagement with industry is often seen as a ‘have to do’ process as a ‘want to do’. In good colleges industry may be involved as a reference committee. From many Colleges consultation means a letter written of support the development of a Strategy. Unless the qualification outcome is directly linked to the day to day functioning of industry it is very difficult to build relationships and mutual commitment for working together. Complicating this is the fact that industry representatives do not have the expertise in competency based training and assessment to enable effective consultation. It is difficult to see how the expectation for industry to participate in a meaningful way in assessment validation can be fulfilled in many sectors. This is particularly so for those generic industries mentioned earlier.
- Whilst it is acknowledged that there are already requirements for industry currency, greater emphasis could be placed on the currency of trainers’ and assessors’ vocational experience. Professional trainers and assessors who are also not current practitioners quickly get out of date with current industry practice, leading to less relevant and less industry reflective 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?

“Tests” seem to imply knowledge assessment. If there was industry mandated standardised knowledge assessments, industry may feel more engaged with the the VET system however it is not the knowledge components of assessment that are likely to need improving. Standardised knowledge testing would not improve the determination of job readiness.

If these tests were knowledge based the implication is that content delivered by the range of RTOs delivering the qualification would also need to be standardised to enable students to be prepared for completion of the tests.

Including work placements in more VET qualifications may result in increased industry engagement but in many industries where workplacement is mandated industry is not always willing to offer placements or engage in adequate provision of work experiences and effective supervision.

Many VET graduates are completing their qualifications as a pathway into higher education. Their focus is therefore not job readiness, but rather university preparation. In this case engagement with industry seems a distant requirement and not required for university entry.

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:

- 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?
 - Industry can mean a variety of groups depending on the sector and in some cases, as mentioned earlier, there is not clear industry representative. If the focus of training and assessment is on the workplace i.e. preparing people for specific job roles then the employers should be involved in the design of training and assessment. As part of that design process they should be involved in validation of assessment. Their contribution should focus on the relevance of assessment to the industry and how competency determination is linked to the requirements of the job role.

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?

- This sector demands partnerships between industry and the training sector. This was an emphasis in the original training package and acknowledged the need for working together. Building the capability of industry would be helpful - what would be more helpful is to educate the industry on the importance of becoming involved – how increased support of training can improve their own outputs.

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?

Industry must commit to supporting training and assessment if they expect better outcomes. They are an integral part of the process. It is not helpful to talk about undue burden.

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:

- 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:
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 - 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.

If independent validation is to be pursued by the sector then all RTOs should be required to participate.

- 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?

Assessment should cover skills and knowledge – where skills cannot be adequately assessed in an RTO, such as for online programs, distance programs, then external industry assessment is essential.

- 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?

See responses above – all RTOs should be made to conduct independent assessment.

- 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?

As mentioned above, external assessments are absolutely necessary where the RTO is not capable of administering the tasks. External assessment centres/organisations should play a very important role in the sector, partnering with these RTOs to ensure that students are required to demonstrate their job readiness through practical and integrated assessment. Who should do this? RTOs who specialise in assessment. Who should oversee them? The existing regulators.

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:

- 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?

These questions speak to some of the most fundamental aspects of competency based training and assessment. RTOs who deliver the TAE should ensure that trainers and assessors are equipped to not only answer the question of what is job ready and what is competent. However, we see trainers all the time who do not have any kind of grasp on these issues. Approximately 6-8 years ago there were excellent resources available for teaching the original TAA qualification and these topics were integral to the qualification. Lets go back to basics and consider the purpose of the TAE training. Lets ensure that people are provided with trainer /assessor training programs that are complete, grounded in the fundamentals of competency based training and assessment and lets make sure that the regulators do their job thoroughly to ensure that all RTOs who are registered to deliver the TAE qualification do so responsibly!

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:

- 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?

Any additional content should focus on explaining the need for practical assessment and assessment of applied and integrated assessment in realistic workplace situations.

- 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?

No

- 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?

Partnerships with industry could assist with determining the adequacy of assessment practices. Regulators with assessment competencies that are current could work with industry representatives to check assessment outputs. Involvement of industry should be emphasised as being beneficial for all parties. There would be a cost but as mentioned earlier the quality of assessment must always be balanced against cost whether it be monetary or risk and safety.

- Is ASQA the appropriate regulator to oversee this function, or are there better placed agencies such as firms that specialise in assessing students?

ASQA is the regulator so they should oversee this function however, they are not subject specific experts. Partnerships with industry could result in more effective analysis of an RTOs ability to assess job readiness.

- 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?

No.

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:

- How could the focus of regulation move to evaluating assessment outputs?

Regulators could require RTOs to provide evidence of ongoing validation and moderation of assessments, including outputs of independent validation on a yearly basis. Part of the reporting could include samples of student work and sampling size would be based on the regulators calculator.

- 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?

Either would be appropriate.

- 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?

Yes the risk factors should be taken into account.

- 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?

Repeat offenders should be dealt with swiftly and harshly. If the training is in high risk area the RTO should be prevented from training. With regards to communicating activities and findings there is much improvement to be made. ASQA is known as the faceless and nameless organisation. RTOs struggle to build any kind of relationship with auditors and in some cases ASQA provides no response at all to enquiries. Lengthy periods of time to complete audit reports along with no

communication, apology for delays etc works against the image of the regulator as it builds resentment across the sector.

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:

- 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?

Yes. As mentioned above risk factors must be considered.

- Should a scheme for the reassessment of students be implemented?

Yes, to be fair and adhere to the principles of assessment.

- If so:
 - Are there any situations where a student should not be offered the chance to be reassessed, for example, student fraud?

- Yes, but fraud must be proven.
- 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?
- ASQA should adhere to the currency rule of evidence to help make such a decision i.e. if the student is now working in an industry and has developed on the job knowledge and skills (in an industry that does not require specific accreditation) then there would be no requirement for further training. Where there is a requirement for accreditation, on the job assessments could be administered or an RPI program offered.
- 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?
- The cost should ideally be borne by the RTO but of course this may not be possible if the RTO has been closed.
- Who should deliver the reassessment? Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment?
- This depends on many factors. If the original RTO corrects its practice it could be asked to reassess at no cost. If they are not operating, another RTO would be required.
- 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?

Perhaps, although the membership requirement for RTOs might be expensive and become a deterrant for people wishing to set up RTOs. This approach is more about cure than prevention. Why not focus on encouraging good practice to avoid such situations occurring?

- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

No idea.