



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:

No, not appropriate for large numbers of RTOs to deliver this qualification. Registration of an RTO to deliver must be done carefully and be based on years of experience in developing educators and trainers to a high level. Principals of the RTO need to have significant educational qualifications at degree level or higher, as well as Diploma in VOCED.

The RTO could deliver training to own staff but a separate RTO needs to assess them, with safeguards to stop back scratching. (eg a separate authority appoints the assessors)

Evidence of prior activity should essentially be a part of the assessment of a unit (in Delivery and Assessment – others RPL ok) as well as practice over time during the delivery time of a unit (2 -3 months). Catch 22 is that some RTOs believe that new trainers should have CIV before they start!

Delivery of CIV must have a practical component and not an in class simulation, which is how the 3 day CIV courses operate. The Diploma of VOCED in particular was developed for higher level VET capability so should also have a practical component. Thus trainers and assessors of CIV TAE qualifications need to have substantial general delivery and assessment experience (recommend at least 5 years)

Yes, entrants to TAE Dip must have relevant VET experience measured in years and hours per year. Say minimum of 200 hours per year for 3 years. Delivering a range of qualifications.

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:

A person at CIV level should not be required to develop assessment tools, but to appropriately use them. TAEASS502B Design and develop Assessment tools should be delivered at Diploma level and trainers should only need to mutilise and validate them at CIV level

Majority considerations best way to go, provided there is a fair diversity of different providers. For example, decisions should not be based on a umber of loud small private providers. The weighting of advice should be commensurate on the size of the organisation, (of course discounting where a small/large organisation has auditing problems)

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:

It would be easier to collaborate with existing associations rather than develop from scratch.

Eg the Australian institute of Training & Development has been around for many years, and most of their members have an interest in CIV TAE as well as the myriad of other training activities that occur in industry in Australia.

Barriers include the lack of federal funding to set up as well as differing opinions on the real standard required for CIV and Dip TAE. High fees that might need to be charged for membership.

A useful purpose for an association would be to set standards for membership, thus lessening the pressure on ASQA. There could be organisational or single membership. The standards would lessen the opportunity for improper delivery of CIV & Dip TAE.

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:

A national professional association would:

- Provide structured PD for members aligned to best practice delivery and assessment on TAE quals
- Be an authoritative source of information for members
- Be a debating space for members about VET delivery, recognition and assessment issues
- Work with ASQA to provide two way understanding of audit issues and so lessen misunderstandings
- Promote best practice assessment models/practice/instruments
- Take in members at two levels – associate and full member. Full membership awarded after internal audits/observation of good practice.
- Would be directly aligned to one or more associations which also promote best practice (eg AITD, some university adult education degree programs)
- Close alignment with AITD, provided that they are willing to recognise the need for such an organisation

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:

Model B is best as it will provide more consistency across delivery and assessment in TAE in Australia.

The dodgy brothers will disappear as they will not be seen to be high quality deliverers and assessors of the qualification.

There will be higher influence levels for delivery and assessment, for better quality overall, instead of current model of meeting minimum guidelines.

Membership of the association will only work if voluntary, but a professional member can advertise as such, especially if they move from associate member to full member (and perhaps to fello member for highest achievers)

Membership could be organisational or individual. Detailed standards would be required for organisational membership.

6. Discussion questions – capability frameworks:

- What can be learnt or applied from the capability frameworks that have been developed or are currently being developed?
 - Is there an opportunity to make better use of these frameworks, irrespective of proposals to develop a professional association?

COMMENT:

Capability framework can define the requirements for different levels of membership of the association.

7. Discussion questions – increasing industry confidence:

- Are there alternative approaches not covered in this discussion paper on how industry can increase engagement with the conduct of assessment, but not specifically the validation?
- Are there other ways to ensure industry confidence in assessment without requiring independent validation of assessment? For example, are industry-endorsed, externally administered tests a practical alternative to ensure that VET graduates are competent?
 - What would be the benefits and drawbacks in requiring such tests? Under what circumstances would they be mandated, for example, for particular student cohorts? Should these be specified in training products?
 - Who should regulate the tests?
 - Should such a test be a pass/fail dichotomy, or would it be more important to use the test to identify gap training?
 - Is the concept of an externally administered test, such as a test required before receiving a qualification, inconsistent with the premise of a competency based VET system?
 - Should the results of tests be made public at the RTO level?

COMMENT:

The question is unclear as to whether it is about assessment instruments and recognition within TAE or assessment in general.

Conduct of assessment within TAE – there is no industry as such, so issues about standards, assessments etc would only be discussed within the adult education and training profession, where there is delivery of VET qualifications.

Engagement with industry is part of the overall requirement when training packages are put together and also when RTOs need to engage with their local industry. In this context, industry does not, and should not be required to understand what a unit of competency is, and how to assess. The RTO really needs to work out how the industry information can be utilised to develop assessment instruments which help assess the worker without placing undue stress on the work environment.

Assessment validation only works across RTOs, who deliver the same package. Again industry players should not be involved in this exercise. Special consideration may be needed if there is very little delivery across RTOs. An industry expert would then need to be engaged.

Where possible, tests and detailed instruments should be developed to standardise assessment overall. Tests may only be appropriate in certain units of competency or groups of competencies and would form part of the assessment. These would come with marking guides. Vital key assessments could be marked across RTOs (perhaps two or three per qualification, especially at higher levels and where there are key safety or legal considerations)

There should be no problem with standardised key test or assessments as each unit of competency, when awarded, should be the same if delivered and assessed by any RTO.

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:

It is problematical to be able to organise any decent level of industry involvement in assessment validation as they do not have the time nor skills,.

It would be better to set up a system whereby organisations repond, after a unit of competency has been delivered and assessed, whether there has been a change in behaviour of the employee who gains a competency. That is a more appropriate validation method.

So mthe process should be, a return to a company, after, say 3 months and a check on the behavioural outcome of employees who were granted certain assessments. A supervisor and employee can provide feedback. If the employee behaviour has not changed, and that is repeated, then the deleivery and assessment of that unit is not working.

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:

Independent validation should be arranged only in high risk situations with industry authority involvement (whether it be government or professional associations).

To get industry voluntary involvement is problematic in most circumstances.

10. Discussion questions – industry expectations and graduate capabilities:

- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?
 - Do higher order issues need to be resolved regarding terminology such as ‘competent’ (as assessed against the training product) and ‘job ready’ (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?

COMMENT:

There is a potential gap between “competent” and “job ready”. In theory one should lead to the other, but it is impracticable and too time and resource consuming to test a person for every potential range of possibilities. General experience plus competency equals job readiness, especially if there is a gap after the competency is achieved, invariably in a training environment

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:

A good method would be to standardise assessment instruments through RTO and industry co operation, together with clear understanding of evidence requirements.

Evidence from some core instruments could be audited for consistency across RTOs to provide a moderation of evidence standard

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:

Cross RTO validation and moderation processes need to be audited by the regulator. The level of involvement needs to reflect the number of students the RTO has.

Validation and moderation need to be separately audited.

RTOs which consistently fail to utilise appropriate assessment instruments and sign off on inadequate evidence, or participate in validation and moderation need to have their scope for delivering that competency/qualification rescinded.

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:

I agree that inadequate assessment is a scourge on the good name of the qualification and on quality RTOs.

Warnings and temporary suspensions and finally cancellations should be the process.

Reassessment should be by another RTO.