



## 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](mailto: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:

### 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?*

All RTO's should be focused on high-quality provision, so to make a special case for differing standards for TAE qualifications or skill sets should be redundant question. Accordingly I would not support this proposal.

As with many proposals for reform over the past five years, there seems to be no inclination to allow one reform to be fully implemented and evaluated before reaching for the next one. Changes to the requirements for standards of delivery for this qualification set were only introduced in April 2015 for existing RTO's (Trainer/assessor requirements; provision of resources at registration, validation etc) and there is seemingly no data publically available on their efficacy.

Further and continuous reform in this area, as a special case, would rather suggest that the national training system is broken or that this qualification set is malformed at source.

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

I believe this is a question of ethics and would personally prefer that RTO's do not issue to their own practitioners. However there are many high-quality providers of TAE qualifications who prefer their own staff use their services to ensure the best possible outcome, which their principals are able to personally vouch for.

To regulate in this manner will not prevent poor performing providers who will simply set up arrangements with like-minded RTO's to "swap" services.

So together the only penalty paid here for introduction of this proposal, will be paid by the committed high-quality providers. A perverse outcome indeed.

- *Are TAE qualifications and skill sets so significant that evidence of competence should not—or cannot—be appropriately demonstrated via recognition of prior learning?*

This suggestion makes no sense at all. It essentially says that Recognition of Prior Learning is automatically invalid as an assessment method.

I can immediately think of numerous cases where recognition would be appropriate for all or part of the TAE qualification set. (eg Corporate Trainer entering VET space, allied teaching professional entering VET space, migrant trainer/assessor, VET practitioner re-entering direct VET training/assessing space)

All of the first three discussion points relate to the standard of training and assessment of the TAE qualification and skill set. Surely the key points in this discussion should be;

- 1) The quality of the Training Package with respect to competency definition. Does the Training Package when properly applied, support the outcomes desired? I would suggest that it does not, given that we are having this discussion.
  - 2) The maintenance and scrutiny of adequate evidence supporting decisions of competence made by an RTO. If there were any area to reform, I would suggest that it be in relation to extending the requirement for retention of evidence.
- *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?*

Industry currency may be developed and maintained in many ways. Time based solutions, which still exist in some industries, fly totally in the face of competency based approaches.

- *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?*

Convincing research that this would improve efficacy of the system would be required to support this change. It is not at all clear that such requirements always lead to the desired results in our primary and secondary system.

- *Should the TAE Certificate IV and/or Diploma require a practical component? If so, how long should the practical component be?*

Observation indicates that practical components of TAE delivery are sometimes scant, especially for new entrants from non-training or allied backgrounds. This matter should be addressed by TAE providers on a case by case basis and satisfactory evidence of this should be retained for subsequent audit activity.

- *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?*

There may be merit in this approach however the proposal is defined in a very narrow way. Would recognition be provided for entrants demonstrating employment history in non-accredited VET training, allied teaching or training roles? The proposal has all the same pitfalls as the discussion on preventing RPL as not appropriate for TAE.

Surely the discussion needs to focus on defining and achieving competent outcomes, not prescribing the method of reaching them.

## 2. Discussion questions – skills and qualifications of trainers and assessors:

### **COMMENT:**

When training packages are developed from “scratch” they involve input from industry users of the package. I see little evidence that TAE “industry users” (trainers and assessors and allied professionals) are successfully involved to any extent in development or improvement of this package.

While there may be exceptions such as the TAE delivering cohort, more engagement with practitioners (users) of the TAE package could well improve outcomes.

### 3. Discussion questions – benefits and purpose of a VET professional association:

**COMMENT:**

I believe a national professional association, with voluntary membership, could be useful if it had a single focus on establishing and validating professional development standards and processes for VET practitioners.

Barriers to such an association would include;

- prescriptive requirements for VET practitioners that seem to be continuously changing in a reactionary fashion, preventing genuine continuous improvement.
- massive variation across Training Packages, in their varying prescriptive formulas for VET practitioner requirements
- continuous “reform” which draws professional development focus to compliance not improvement

Removal of these barriers requires an approach to competency based training in Australia that supports practitioners and organisations committed to high quality training outcomes. We are grateful to see some of this approach developing, through the consultative and risk management approach being taken by the national regulator.

#### 4. Discussion questions – potential activities of a VET professional association:

**COMMENT:**

The single function of coordinating and designing a nationally consistent professional development framework would be sufficient aim in itself for such an association.

Registration of VET practitioners would be a regressive step. Licensing or registration *per se* is rarely correlated with performance.

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

### **COMMENT:**

Model A or B with the ability for associations membership would be preferable.

Model C is a licensing model and would do little other than exacerbate the interjurisdictional issues already faced within the sector.

Membership should be voluntary. Professional development standards if properly developed, could appropriately be compulsory. To clarify, membership of a body means nothing in terms of behaviours, it is simply de facto licensing.

Requirements to undertake relevant professional development activities might well be compulsory, provided there is sufficient flexibility to accommodate individual practitioners needs. To this end there are numerous mature professional development models to study for transition or adaptation into the VET sector.

We already have more than enough regulatory environment to monitor achievement of professional development without introducing a licensing system.

## 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:**

There is plenty of opportunity in the broad VET Sector to make use (or better use) of these tools.

## 7. Discussion questions – increasing industry confidence:

### **COMMENT:**

I am always mindful that in the implementation of training delivery to apprentices and trainees, that final assessment should not occur in this situation, until the employer is satisfied with workplace competency. I realise this cant be universal but it has been a very useful tool in ensuring employer confidence in RTO assessment.

Industry confidence could be built by providing better 'consumer' information to industry on what to expect in a quality assessment. I would support centralised material being required for presentation to industry users and learners. At the very least, good understanding of what competence really means is not widespread or universally agreed amongst and within RTO's and industry.

We also should not underestimate the negative value of competent outcomes being linked to employment access in many sectors (eg security licence before placement), which places pressure on industry and RTO's alike to assess competence prior to actual achievement.

Externally administered tests would be regressive. It would reduce assessment to an exam with arbitrary requirements open to abuse in the manner that licensing systems are now. As a regulated function it would also certainly fail to meet contemporary needs on many many occasions .

## 8. Discussion questions – the role of industry in assessment:

### **COMMENT:**

Focus with industry needs to be with accuracy of training package development.

With some exceptions my observation is that industry prefers to focus on the training that meets their needs rather than the processes around it.

Over the past sixteen years I have been involved with a number of training packages and unfortunately it has been rare in some quarters to see genuine committee type consultation and review on training package development. Too often training package development has been predicated by external agendas.

Fixing this at source should be the focus of targeting industry to build confidence in the system.

## 9. Discussion questions – specific models:

### **COMMENT:**

In my opinion this conversation is perpetuating a reactive approach to assessment.

Training package accuracy, and continued or strengthened analysis of evidence of decision making (an existing tool available to the national regulator) should be preferred to any of these proposals.

## 10. Discussion questions – industry expectations and graduate capabilities:

**COMMENT:**

There is a great deal of room for improved conversation on the terminology associated with VET system expectations of industry and students.

## 11. Discussion questions – evidence of assessment and graduate competency:

### **COMMENT:**

There has been recent reform in the area of assessment standards and evidence requirements (within training package design). Accordingly it is premature to revisit the effects of reforms in the absence of new qualitative research.

I would support longer retention of completed assessments. Modern data storage availability makes this an inexpensive exercise relative to other delivery costs. Of note here is that in general terms State Training Authorities who fund training already require this.

It is hard to comprehend how longer retention would incur excessive costs or burden as RTO's already have a minimum requirement to store this type of data for six months or to the end of appeal periods in any case, (although it is clear that larger RTO's would have larger overall costs).

ASQA is certainly the appropriate regulator to oversee this function. Audit reports in the public domain already indicate that they perform this function well.

## 12. Discussion questions – enforcement:

### **COMMENT:**

Mechanism for focusing regulation onto the evaluation of assessment outputs exists already within our current regulatory environment.

Regulatory enforcement options also exist within the current environment.

I am not sure how administrative powers to force re-assessment could possibly work in practice as they would require participant co-operation to be effective.

Characteristics of the RTO should play no part in decision processes.

There are adequate remedies for repeated non compliance within our existing structure. The removal of perverse incentives (eg uncapped advance payments) for poor actors to attempt gaming of the system would go further to alleviate issues than any new or expanded enforcement measures.

I believe the current national regulator provides good transparency and disclosure of regulatory decisions.

### 13. Discussion questions – cancellation and reassessment:

**COMMENT:**

Rescinding qualifications is a remedy that should be available to the regulator, across all qualifications and awards.

Frequency should be determined in accordance with Legislation and Regulation with well developed guidelines. It should follow well defined natural justice principles.

This is not a matter that should be characterised as needing more or less, by public opinion.

It is illogical to believe that poor actors will have funds available to support re-assessment in any form.

I do not support a centralised tuition assurance fund. My observation is that poor actors simply use existing tuition assurance schemes as a 'get out of jail card' to avoid doing the right thing in the first place. The risk management approach to regulator activity should be preferred with the goal of removing these organisations from the VET sector.