



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:

It is too easy to put new courses on scope. The number of courses an RTO can deliver should be limited to their proven speciality based on proven capability and past performance results. Currently RTOs include any area of training they wish without first putting in place sufficient knowledge in that area. I doubt there is enough scrutiny by ASQA when it comes to approving changes to a RTOs scope.

The ability for RTOs to train their own trainers is always going to be seen as dubious whether the training was authentic or not. Dis-allowing RTOs to train their own staff would help bring credibility to the industry, present an opportunity for RTOs to interact more to provide an opportunity for validation of courses run by other RTOs. The validation process could be made mandatory when a person working for a RTO receives a qualification from another RTO. This should also apply to contract trainers.

Some skill sets are so significant that evidence of competence should not and cannot be appropriately demonstrated via recognition of prior learning. I do not believe that skills such as WHS, TAE should be based on RPL and obviously high risk and mechanical training would be included in this mix. RPL in some circumstances could be possible without entirely being an online process. RPL is not a satisfactory assessment method and should only be used in extenuation circumstance with a minimum of online activity. In my experience, when a RPL assessment is used correctly there should be as much time and effort spent on proving satisfactory RPL as a genuine learner would spend on completing a course in which they have the previous knowledge and skills. Personally I

think RPL will never meet most of the current rules of assessment and undermines genuine training approaches.

Improving the assessment skills of the VET workforce comes down to the quality and aptitude of the trainer/assessor. At the outset, Cert IV TAE should not be available as an online course and should have a mandatory face to face component of 40 hours in one week leaving at least 4 projects to be completed at a later date and within a set period of time (3 months?). To underpin this and provide a higher quality of training and assessment we need to consider:

- ✓ TAE qualifications and skill sets should be delivered by VET practitioners who can demonstrate a specific period of training and/or assessing employment history in the VET sector;
- ✓ The TAE qualification must include a substantial face to face training component within groups of at least 10 learners;
- ✓ Entrants to the TAE Diploma should have a pre-requisite of at least twelve months supported by performance evidence including learner feedback, progression rates and minimum hours and observation of skills in the presence of an ASQA inspector. This is so important that there should be a special process for those wishing to complete TAE Diploma;
- ✓ Trainer/assessors need to be graded based on anonymous learner feedback via a link to ASQA at the completion of each UOC before competency is recognised; and
- ✓ Trainer/assessor need to be observed by an ASQA inspector at intervals that are practical based on learner feedback.

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:

Core units such as TAEASS502B and TAEASS502B should be include in the TAE since these skills are a major requirement for this qualification and therefore should be introduced without the consideration of stakeholders who may object on the grounds of convenience rather than quality improvement.

The role of the trainer/assessor however requires review as the tasks required to be performed are too broad. Course design and development is a separate and specialist activity from training/assessing. Being a trainer/assessor does not automatically translate to being a good course development writer and vice versa (in the vast majority of cases).

Only those with TAE50211 - Diploma of Training Design and Development are qualified to write training material while being able to meet the following conditions:

- ✓ Currency in the industry about which they are designing course material. Currency could include some of the following examples:
- ✓ active memberships to relevant professional bodies; and or
- ✓ involvement in the industry in the last three years; and or
- ✓ attending relevant conferences or seminars; and or
- ✓ recent tertiary qualification in a relevant discipline; and or
- ✓ sitting on a board; and or
- ✓ Involvement with Industry in a consultancy capacity.

One of the root causes of poor training outcomes is the low quality of training material. Ensuring courses are well structured and written in the first place will improve quality. While trainer/assessors will still have to maintain a degree of currency. Provided trainer/assessors are well trained themselves the superior quality course material will provides the key to better training.

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

- Is there a need to establish a national professional association for Australia's VET system?
 - Specifically, is there a clear role for Australian governments in assisting the development of professional skills of the VET workforce by funding a professional association?
- What are the barriers to establishing a national professional association? How could these be overcome?
- What would be the most useful guiding purpose of a national professional association?

COMMENT:

The establishment of a national professional association for Australia's VET system for course developers and trainer/assessors is fundamentally a good idea. The only danger is that it may become just another layer of the industry which in time becomes merely a committee machine churning out useless advice and information based on discussion over tea and scones.

Barriers to establishing such a body may include:

- ✓ A less than favourable image in relation to these kinds of organisation;
- ✓ The ability to attract 'quality' organisers and committee members;
- ✓ Cost; or
- ✓ Perceived benefit;

The establishment of a professional body should use as its mantra a strong commitment such as; to ensure that Australian training outcomes meet or exceed world's best practice.

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:

Typical activities for a national professional association to undertake should include:

- ✓ approve or design professional development programs;
- ✓ development of capability frameworks;
- ✓ promoting 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 course developers trainers and assessors;
- ✓ interact with industry to respond to their emerging needs; and
- ✓ register VET practitioners.

If an association were to be developed it would have to be a start-up as there is too much bad history and baggage existing in VET. There is no organisation currently that could fulfil this role. We need fresh faces and a highly skilled/paid CEO who has the ability to get the results required.

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

COMMENT:

Membership should be kept to trainer/assessors and course writers at the exclusion of RTOs and be a voluntary membership. If it's mandatory then anyone who is breathing can become a member and therefore it's assumed by onlookers that his/her membership means something in terms of their professional skills. Memberships should be scrutinised annually to maintain integrity and quality professionals as it must *mean something*.

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 should be the responsibility of the national 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:

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 - Should the results of tests be made public at the RTO level?

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

COMMENT:

I have found that industry (and RTOs) are not interested in spending time with validation. Writers of learning material and assessments are the only ones who need to be aware of current industry trends (in the main). I believe writing material is a specialised task and should be left to people who are trained and experienced. A writer should therefore be required to maintain currency through associations, professional bodies and other avenues to become a specialist writer just as trainer/assessors have to have currency in what they are delivering/assessing. Once the writer gets it right there is less emphasis required for a trainer/assessor to have industry currency.

Industry validation requirements are un-reliable except in the case where courses have been developed solely for the purpose of a particular organisation such as recreational vehicle assembly. In general, industry has very little knowledge about the principles of VET and this in itself is a barrier to obtaining relevant feedback.

In my experience no. I find that those offering to validate are those that need the course. They also can only provide feedback from one industry (theirs) while a specialised professional writer can spend time being across many industries in support of material development. In the case of management, marketing, project management and the like, industry validation only serves to confuse the issue. Courses can be based on latest trends and current business practices which can be easily identified through consistent research and other means. Skills and knowledge learnt in these areas are transferable between organisations and across many industry types.

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:

No comment provided.

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:

No comment provided.

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

COMMENT:

I don't see that ASQA spends enough time and other resources investigating the quality training material RTOs are using.

The focus of ASQA in relation to RTO audits should move away from what appears to be mere compliance checks such as do they have a TAS and is there a date missing somewhere. Working as a contract trainer, in most cases, assessments are written at a level that requires answers that would be acceptable for a qualification at least two levels below the one being trained.

As ASQA requires that trainer/assessors maintain industry currency so should it be that ASQA auditors maintain currency in the industry for which they are conducting audits. It is impossible for an auditor to judge the quality of training and assessment tools if they are not across the industry the course is based on. Every audit must include *drilling down* into the RTOs assessment tools by competent officers. If this is not done it is the equivalent of a *tick 'n' flick* assessment mentally being applied to an audit which essentially uncovers nothing but perhaps a signature missing or a date wrong.

Results of audits should be made public on the ASQA website so stakeholders can understand what ASQA is auditing and at what level RTOs have been rated.

LLN continues to be an area where everyone has a different interpretation of its purpose. In recent report for the chief executive of Australian Industry Group (Ai Group), Innes Willox was quoted as saying that international data revealed 44 percent of Australians had a literacy proficiency skills below 3 considered to be the minimum to operate effectively in the workplace and society. In addition, Professor Briguglio, the manager of Curtin Business School, said that the Ai Group reported that a study showed that 93 percent of surveyed employers found low literacy and numeracy levels were negatively affecting their business – *The West Australian* 30th Januray 2016.

I have found it a common practice by RTOs to push learners through to course who have clearly shown from a LLN test that they do not have the skills levels required to complete the course. For a trainer/assessor, this can mean delivering to a cohort of 12-15 with up to 30 percent not having sufficient skills levels for one reason and another. Trainers are expected to modify delivery and assessment which is impossible to do effectively to the detriment of the entire cohort.

Trainer/assessors do not have the skills required in most circumstances (not to mention time). Since such a great percentage of Australians cannot meet skills level requirements this must be seen as an area of concern that can only be handled by those with the training, time and resources to help candidate wanting to enrol in courses to improve their skills levels.

Some responsibility has to come back to a controlling government body. LLN test results must be administered through ASQA who then directs people to organisations who are competent at in increasing skills to required levels. As the level of skills among Australians had degenerated to such a low point this surely in a fundamental issue with resolving it be imperative to legitimate learning and knowledge outcomes for Australia.

12. Discussion questions – enforcement:

COMMENT:

Every audit must include *drilling down* into the RTOs assessment tools by competent officers. If this is not done it is the equivalent of a *tick 'n' flick* assessment only applies to an audit which essentially uncovers nothing but perhaps a signature missing or a date wrong.

In dealing with RTOs providing inadequate assessment the regulator should have the power to require a RTO to immediately repay any funds already received for the course in the case of VFH and a name and shame announcement of the ASQA website until the issue is resolved. For not VFH a fine equivalent to the value of the unit and a name and shame on the ASQA website after the third breach.

For RTOs that are repeatedly non-compliant with assessment requirements, an order to immediately repayment of any funds already received for the course in the case of VFH and a name and shame announcement of the ASQA website until the issue is resolved. For other than VFH a fine equivalent to the value of the unit and a name and shame on the ASQA website after the third breach.

Currently the regulator does not provide sufficient transparency and disclosure. ASQA must make available all information about the outcomes of audits or investigation on the ASQA website. This is similar to the Worksafe WA site providing information about those companies for employees who have been found contravening the WHS Act and reports on the progress of prosecutions and other outcomes. The public have a right and need to know about the quality of the RTO they are enrolling with.

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? **Yes, inadequate assessment is competence.** 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? **No.**
 - Should there be a time period after which ASQA should not move to cancel an individual's qualification? **No.** 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? **No.**
 - 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? **Yes.**
 - Who should deliver the reassessment? **An RTO appointed by ASQA as they have the knowledge of which RTOs are performing training in accordance with guidelines.** Are there any circumstances in which it would be appropriate for the original RTO to undertake the reassessment? **Yes, if the RTO is identified by ASQA as being a quality RTO.**
 - 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? **Yes.** Who should operate such a fund, and who should bear the cost of its operation? **ASQA**
- What linkages with income support eligibility should apply for graduates impacted by any recall of qualifications?

COMMENT: