



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 Yes No website or otherwise be made publicly available?
 - 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.

Introduction

VETASSESS is Australia's largest assessment-only RTO. As recognised experts in assessment, VETASSESS provides its clients with independent, rigorous and efficient assessment services that are responsive to both client needs and the needs of the Australian labour market.

Under a Services Deed with the Australian Government's Department of Education, VETASSESS conducts trades skills assessment for 25 occupations in 16 countries for applicants wishing to migrate to Australia. VETASSESS also offers:

- assessment for over 350 professional occupations listed against Australia's Migration Regulations for migration purposes
- test administration services for pre-course entry and selection for a range of government and non-government bodies
- online language, literacy and numeracy testing against the Australian Core Skills Framework
- physical and webcam invigilation services for high stakes tests
- advisory and consulting on assessment models to governments nationally and offshore.

Since its inception in 1997, VETASSESS has conducted several hundred thousand skills assessments both offshore and in Australia. This experience has contributed to VETASSESS:

- developing its substantial assessment capability
- establishing its exceptional linkages with industry and Australian regulators
- developing knowledge of emerging labour force and occupational requirements in a wide range of industries
- establishing a team of highly-skilled and knowledgeable assessors whose competence is underpinned by current industry and assessment expertise and knowledge of international vocational assessment practices.

Given its acknowledged expertise in assessment, VETASSESS is confident endorsing Independent Validation of Assessment (IVA) as a mechanism designed to ensure the integrity, rigour and consistency of assessment outcomes in the VET sector.

Separating training delivery and assessment and applying a risk-based IVA model could facilitate a VET system that is appropriate to the needs of industry and students by delivering rigorous industry-endorsed, quality-focused and independently validated assessment practices.

IVA would not replace the requirements for RTOs to be responsible for assessment against all units of competence relevant to the qualification delivered, but would focus on assessing critical skills and form part of an overall quality assurance regime.

Thus, for the purposes of this Response, VETASSESS supports a (risk-based) third party IVA model that incorporates:

- Independent validation of assessment to be conducted by a third party *not* involved in the delivery of training prior to awarding a qualification for selected high-risk qualifications and modes of delivery.
- Industry engagement in the form of expert industry panels to identify critical skills.
- A highly competent, industry relevant, specialist assessment workforce.

Our Response to the Discussion Paper focuses primarily on addressing **Chapter 2**: Reforms to the assessment of VET students, **Discussion Questions 8 and 9**.

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?

VETASSESS supports industry involvement in all key aspects of the validation process, such as the endorsement of the assessment tools at the higher level, the identification of the critical skills to be assessed, and validation of assessment processes and assessor capabilities.

For clarification, *industry* are those bodies that have a stake in the training, assessment, and client services provided by RTOs including (but are not limited to) Skills Service Organisations, Industry Reference Committees, and occupational licensing bodies.

The separation of training and assessment could facilitate a more targeted approach to leveraging industry expertise. Industry expert panels (pool of industry experts) responsibilities and endorsement could extend to:

- Identification of critical skills required by job-ready graduates aligned to ever-changing industry needs.
- High-level review of assessment practices used for particular occupations.
- Informing IVA providers on current and future trends in their industry and industry-specific risks and the implications for assessment.

The benefits of this approach include not only maximising industry engagement but increased industry confidence as the final measure of graduate competence is externally determined. Consistently measured competence would be determined independent of location, duration of learning, mode of learning and teaching methodology.

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?

It is generally agreed that industry is predominantly concerned with the learners' skills, but not necessarily how they achieve job readiness. Thus, it would appear that industry does not need to engage directly with individual RTOs¹. Further, while training and assessment related activities are not the core competence of employers and industry bodies, RTOs similarly do not generally have the time, expertise, equipment and skills to entirely meet industry expectations.

However, there remains the need for a link between training providers and industry; IVA providers could fulfil this role. One of the roles of IVA providers could be to deliver the necessary connection and support in the validation of assessment between industry and training providers engendering greater industry confidence in the VET system and its graduates.

As an assessment-only RTO, providing specialised assessment services, VETASSESS has worked (and continues to work) successfully with industry and regulatory bodies across a number of sectors to identify critical skills that serve to ensure graduate job-readiness, consistency in assessment outcomes and assessor capabilities. One of the key mechanisms in involving industry is strong industry advisory groups. VETASSESS regularly consults its industry advisory groups on issues including assessment strategy and tool validation, assessor currency requirements, and emerging industry critical skills required by applicants to be considered job-ready. The advisory groups provide current and deeper industry insights than that provided by the different training packages; members of groups have observed assessments conducted by VETASSESS both in Australia and offshore.

Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?

The skills service organisations and industry reference committees may provide the initial connection between assessment providers and industry but it will be working closely with other key stakeholders, such as regulators and peak bodies that will provide a thorough and effective industry supported assessment.

Please refer also to responses above.

How can we ensure engagement with industry is appropriate targeted so it does not add undue burden and is targeted to those within industry with appropriate expertise required for validation of assessment?

Please refer to previous response.

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?

VETASSESS proposes a risk-based third party IVA model which would address concerns around a 'one-size-fits-all'.

As indicated in the introduction, separating training delivery and assessment and applying an IVA model could facilitate a VET system that is directly relevant to the needs of industry and students by delivering industry-relevant assessment, underpinned by rigorous industry-endorsed, quality-focused and independently validated assessment practices. This in turn could serve to increase industry confidence particularly in those industries where there is a higher risk to public and client safety. While IVA would not replace the requirements for RTOs to be responsible for assessment, it would focus on assessing critical skills and form part of an overall quality assurance regime. Success of this model is evidenced in the United Kingdom and New Zealand, among other countries.

Additionally, the proposed IVA model uses a proactive approach through the collection of sufficient relevant evidence of demonstrated performance *and* consistent judgement of competence, *after* formal training and/or on-job experience. To this end, it should be external to (separate from) the delivery of training. Only then might it truly be a gatekeeper to quality assurance.

In essence, an IVA approach incorporates:

- A risk-based approach that recognises that no single model of independent validation will suit all VET qualifications, necessitating a flexible approach to assuring quality of assessments. VETASSESS is cognitive of the need to avoid 'one-size-fits-all'.
- A requirement for training delivery and IVA to be discrete processes for qualifications deemed high-risk (specifically in high-risk industries, such as aged and community care). That is, the verification of competency is undertaken by a neutral and specialised external party not involved in the delivery of the training.
- Mandated IVA for high-risk industries such as early childhood, aged care, electrical trades, etc.), following industry consultation, or high-risk modes of delivery – especially fully-on-the-job training.
- Expert IVA providers who would conduct summative assessments prior to a qualification being awarded by the training provider.

The proposed IVA model provides benefits to key stakeholder groups including students, their employers/industry, their RTO, and Government. IVA represents the potential to provide a cost effective solution to the current reassessment model (as described in Chapter 3 in the Discussion Paper); because external assessment occurs *before* the awarding of a qualification, the risk associated with awarding qualifications that may necessitate reassessment is minimalised.

In summary, these benefits include:

- reaffirming students and employers/industry confidence that graduates have acquired a full set of job-ready skills
- providing graduates with additional information about the quality of the training they have received and any skills or knowledge gaps

- increasing industry and Government confidence in the quality of graduates of the VET system
- provision of independent information to Government about the quality of Government funded training
- enhanced consistency of assessment outcome decisions.

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?

Licensing bodies and government regulators currently facilitate external validation of competence for numerous occupations; holders of qualifications are required to sit additional tests for licensing requirements. These licensing bodies (e.g. electrical trades, building trades, plumbing and gas fitting) play a valuable role in increasing consumer and industry confidence. These arrangements need to be taken into account when considering the application of IVA.

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?

VETASSESS supports IVA being applied using a risk-based approach. It offers a sustainable and viable solution for improving VET assessment outcomes. This is in line with the National VET Assessment Strategy, which recognised IVA as a means for verifying and validating assessment by a third party not involved in the delivery of the training, and which could provide a valuable point of control in the VET system.

Please also refer to earlier discussion around a risk-based approach to IVA.

Should high-risk student cohorts be required to undergo independent reassessment of industry-agreed sets of competencies before being issued with their qualifications?

A definition of, or context for, 'high-risk student cohorts' has not been described within the Discussion Paper. Please refer to the above discussion.

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?

The proposed IVA model is considered proactive and pre-emptive; it validates competence (or identifies gaps) *prior* to awarding a qualification, which in turn eliminates the need for reassessment in the context referred to the Chapter 3 discussion.

Further, as the intent of IVA is a focus on the outcomes rather than the processes it is considered a viable mechanism for assuring the validity of assessment and learner outcomes. External IVA providers' interests lie not in the delivery of training and education, but in assessing individuals' job-readiness based on industry expectations. It provides a clear mechanism to ensure the validity of the assessment process and, in high risk qualifications (e.g. child care, aged care) or higher-risk modes of delivery (e.g. fully on-the-job training) it provides a useful quality control process (as identified in the Discussion Paper).

Who would be most appropriate to oversee the reassessment of qualifications? For example could exiting regulators or other organisations take on this role?

Oversight of RTO compliance with assessment requirements would remain the responsibility of the regulator.

The notion of strengthening and having more specific rules around the conduct of and evidence to support assessment seems contradictory to improving quality outcomes. Indeed, additional rules and compliance requirements would be onerous, potentially leading to an increase of RTOs exerting greater effort in managing compliance at the expense of managing student outcomes.

As noted in Chapter 3, expanding the framework to recognise and register 'training-only RTOs' has the potential to facilitate high-performing (training-only) RTOs with demonstrable, measurable high-quality training outcomes. Training-only RTOs means greater concentration on pedagogy and learner support. Further, training-only RTOs would operate more effectively in an environment of greater competition.

Summary

The risk-based IVA model (refer to Question 9) delivered through assessment-only RTOs supports the concept of training-only RTOs. The specialisation of training versus assessment allows respective RTOs to focus on quality assurance of their specific processes. Because the IVA (assessment-only RTO) is not issuing the qualification, it is able to remain neutral in terms of outcome (results), seeking only to validate the relevance of the training in terms of its ability to meet industry expectations of graduates.

ⁱ Gillis, S and Bateman, A (2015) Assuring Quality and Comparability of VET assessments: Exploring the Role of Independent Validation. Paper prepared jointly by Centre for Vocational & Educational Policy, Melbourne Graduate School of Education, The University of Melbourne and Bateman & Giles Pty Ltd, Pg. vii