

Response to Quality of Assessment in VET Discussion Paper – January 2016 Victoria Polytechnic

CHAPTER 1: FOUNDATION REFORMS

RTO Limitations

Like all qualifications on the national VET Register, Training & Assessment Training Package qualifications are nationally recognised, meet defined industry needs, are developed in consultation with industry and are endorsed by the Australian Industry Skills Council.

Victoria Polytechnic believes that, in principle, adherence to vocational education and training product development and endorsement processes is the guarantee of quality of the qualification. Further, delivery and assessment quality across the sector can be assured through demonstrated RTO adherence to the requirements of the National VET Quality Framework, enforced through registration, reporting and audit processes.

However, consistent design of assessment tasks that meet the requirements of the training product and the rules of evidence & principles of assessment detailed in Standard 1 of the Standards for Registered Training Organisations 2015 remains a challenge in VET. The Australian Skills Quality Authority's 2014-2015 Annual Report highlighted "ongoing concerns about the poor quality of assessment, and the skills of assessors, across the sector" as one of the five "key sector issues" for 2014-2015¹.

In response to similar concerns about assessment capability within RTO's, the Victorian Government is currently introducing an approved TAE provider category. In the future, it will only purchase TAE training and assessment services from RTO's within this category. Victoria Polytechnic supports this as a strategy (amongst others) to better assure training and assessment capability amongst the VET workforce.

Given the centrality of assessment capability in the achievement of quality sector outcomes, consideration might be given to the introduction of a similar approved TAE provider model, including for RPL, within the national training system. This could be achieved through application of a more rigorous addition-to-scope approval procedure for the revised Training and Assessment qualifications when they are finally endorsed by the AISC.

However, it is very important to note that the Standards for Registered Training Organisations 2015 already apply additional levels of rigour to assure quality outcomes for these qualifications: increased TAE trainer and assessor requirements and independent validation of TAE assessment tools and judgements. These additional requirements are still being rolled out and will not be fully in place until January 1, 2017. The success of these new regulatory measures must be rigorously evaluated.

Victoria Polytechnic does not support prohibiting the use of Recognition of Prior Learning (RPL) within TAE qualifications. RPL is a fundamental skills recognition process with the VET assessment system and its proper use must, therefore, be included within the TAE context. Like all other assessment, the quality of the outcomes is dependent upon the RPL tools and processes employed.

¹ Australian Skills Quality Authority Annual Report 2014-2105.
http://www.asqa.gov.au/verve/_resources/ASQA_Annual_Report_2014-15.pdf

In response to the proposal for a practicum, we point to the fact that increased requirements for practice of skills and applied knowledge have been either built into the latest release of TAE40110 or foregrounded in drafts of the new Training Package, still awaiting endorsement. These include

- clearer definitions of group sizes to ensure delivery practice is undertaken in realistic simulated VET contexts;
- requirements for assessment of larger numbers of students and broader range of units of competency;
- demonstrated vocational background added as an entrance requirement to ensure learners have an established industry context for the application of training and assessment competence.

We would also like to propose that any discussion of quality of assessment in Vocational Education and Training might also include a consideration of how increased frequency of Training Package releases can impact on the capacity of RTO's to develop and embed effective assessment instruments and practices in their programs.

1. Skill and qualifications of trainers

TAEASS401B Plan assessment activities and processes is a core unit in the current TAE40110 and already requires learners to demonstrate competency in developing "simple assessment instruments to meet target group needs". We believe this to be an appropriate expectation of entry level competence for VET trainers and assessors. It provides a satisfactory base for further development of professional competence in situ and in accordance with the requirements of the Standards for Registered Training Organisations 2015 in relation to maintenance of training and assessment currency.

Notwithstanding the above, we believe there is scope for strengthening the evidence requirements in this unit to ensure that TAE learners' ability to develop simple assessment tools is assessed over a wider range of competencies and learner cohorts.

TAEASS502B Design and develop assessment tools sits well at the AQF5 level in the TAE Diploma qualifications. This provides the opportunity for recognition of a broader and higher level of competence in assessment design, implementation and review beyond the VET professional entry level. As with *TAEASS401B*, consideration should be given to strengthening the evidence requirements for this unit to ensure assessment over an adequate breadth of units and cohorts.

Consideration might also be given to building in a more diverse range of specialised assessment elective units of competency in these qualifications to support workforce capability development needs within RTO's. These could include specialist elective units on assessment validation, assessment within blended learning modes, workplace assessment, recognition of prior learning, assessing individuals and groups, all of which are sufficiently broad and complex domains of VET assessment practice to warrant a dedicated unit of competency .

With regard to the question of decision-making around the design of the TAE Training Package, we expect the developers of a case for endorsement of any training product to consult with industry and to employ sufficient industry and qualification design expertise to ensure a quality outcome for the Australian VET system. The notion that a "majority consideration", uncondusive to a quality system outcome, might be influential in that decision-making suggests a fundamental structural problem in the VET Training Package development and endorsement process. While we have concerns about the quality of some Training Package qualifications in some sectors, we believe the development and endorsement process remains sound overall, and suggest this line of inquiry in the discussion paper is not justified and is potentially undermining of the system.

2. Benefits and purposes of a VET professional association

Victoria Polytechnic recognises that, as the paper describes, there may be some benefits in the establishment of a VET professional association in terms of developing a stronger role for the VET professional in policy development and implementation, providing opportunities for maintenance of training and assessment currency, designing a

common code of practice, and promoting dialogue between trainers and assessors and other VET stakeholders. We would also endorse the proposal for government funding to establish and maintain such an association.

However, we stress again that the key instruments for assuring quality of VET assessment and capability of VET assessors are already in place, TAE qualifications and the Standards for Registered Training Organisations, 2015 supported by the registration and enforcement powers of the Australian Skills Quality Authority. Allowing current reforms in these areas to be fully implemented, monitored and evaluated before further strategies are introduced to improve assessment practice, is the preferred approach.

3. Potential activities of a VET professional association

We reiterate our response to Discussion Question 3 in that we see some potential value in a VET Professional network but caution against the emphasis on this approach as a keystone in any strategy to improve assessment practice across the VET sector. Our priority is for current initiatives with regard to national standards for RTO's and training and assessment qualifications to fully be implemented and evaluated.

4. Models for a VET professional association

We refer you to our responses to Discussion Questions 3 and 4. However, if the professional association model is pursued we recommend

- a voluntary model,
- a membership base of individuals – not organisations (these already exist),
- funding support from government;

and in principle would support it being tasked with

- drafting an advisory capability framework,
- developing a draft code of practice for VET professionals,
- providing models and resources for continuing professional development.

We are unable to endorse Model A, B or C from the discussion paper as none of the models reflect these characteristics. We urge particular caution with regard to pursuit of Model A, due to its complexity and the suggestion that such a body may have some accreditation authority which could conflict with the functions of the Training and Assessment qualifications, the Standards for RTO's and the registration and regulatory functions of ASQA.

5. Capability Frameworks

We have an interest in capability frameworks as core instruments for workforce planning and development at the provider level. At this level we believe such frameworks can be very beneficial in building organisational capability.

While there has been occasional and sporadic interest in developing and implementing sector-level frameworks over the last decade or so, these have never come to fruition, largely due to competing sectional interests.

A professional association might build an effective advisory capability framework that RTO's could adopt for their own workforce development aims. However, standards for entry-level training and assessment competence must remain the province of the endorsed VET qualifications, and regulation and enforcement the province of the national standards and the regulator.

CHAPTER 2: REFORMS TO THE ASSESSMENT OF STUDENTS

7/8. Increasing industry confidence / The role of industry in assessment

Standard 1.6 of the Standards for Registered Training Organisations 2015 requires RTO's to "implement a range of strategies for industry engagement and systematically use the outcome of that engagement to ensure the industry relevance of (a) its training and assessment strategies, practices and resources; and (b) the current industry skills of its trainers and assessors."

It is important to note that this standard requires a "range of strategies" – not a single strategy, such as industry participation in validation. Effective RTO's do engage in a range of strategies including conducting periodic industry consultation events, participation of industry in course reviews, systematic gathering and recording of pertinent information in all engagements with industry customers, customer surveys and so on, as well as the application of this information to continuous improvement processes.

An understanding of industry culture, practice and needs is generated from ongoing, systematic and coordinated industry engagement at all levels of the RTO and this allows the RTO to maintain engagement strategies that access industry knowledge without over-taxing industry resources. The proposal for mandated industry participation as independent assessment validators could risk undermining existing effective RTO industry engagement strategies.

Furthermore, validators require assessment competence, that is, the skills and knowledge to determine that

- a. the assessment task meets the Rules of Evidence and the Principles of Assessment detailed in the Standards; and
- b. that the assessor judgements meet the evidence requirements and conditions of the assessment tasks.

Given that the discussion paper highlights a gap in assessment competence amongst the VET workforce, it appears contradictory to propose that validation of assessment tools and assessor judgements be undertaken by people without proven assessor competence.

In relation to the proposal in the discussion paper for industry-endorsed, externally-administered testing to make a final determination of competence, we advise caution on the grounds that such a move may

- risk undermining public confidence in the design of VET qualifications, the Standards for Registered Training Organisations, the effectiveness of the regulator and the assessment practices of all RTO's ;
- add an additional and substantial layer of expense to assessment which would probably need to be absorbed by the learner; and
- potentially impact negatively on assessment capability within RTO's as RTO assessor judgements would no longer be instrumental in determining final competency outcomes.

Furthermore, before introducing any widespread external assessment requirements into the system, we would advise research and evaluation of external VET assessment regimes that currently exist in the system, in particular in relation to the licensed trades, to identify implementation issues and risks.

Notwithstanding the above cautions, we would strongly welcome support for improved assessment practice through the provision of high-quality, industry-validated assessment tools for qualifications distributed through a central clearing house – possibly through Skills Service Organisations with the endorsement of their Industry Reference Committee. Such an initiative would better assure industry engagement in assessment standards, and overall sector-wide consistency in standards of assessment.

9. Specific models

There is a precedent for introducing independent assessment validation requirements for specific qualifications in response to identified risk - Standard 1.25 of the Standards for Registered Training Organisations, 2015 which applies this requirement to assessment of all qualifications, skills sets and units with the Training and Education Training Package.

However, if this approach were to be extended across a broad range of Training Packages or qualifications, consideration would need to be given to

- the availability of independent assessors with industry *and* vocational currency and competency to undertake the task;
- the size of the validation samples;
- the costs and who will ultimately bear those costs; and
- the capacity of the regulator to ensure compliance.

The standard (non-TAE) validation requirements within the current standards are quite rigorous. Rather than impose further tightening of the rules around validation, we would prefer a focus on supporting RTO's to build current capability in all aspects of assessment, including validation, by provision of best practice models and guides, as proposed as one option in the discussion paper.

10. Industry expectations and graduate capabilities

We see no need for “the government or industry to develop resources outlining VET graduate expectations for particular training products”. The Training Products should clearly articulate the competency and level of performance expected of graduates. The “Qualification Description” field of the Qualification Template in the Standards for Training Packages, 2012 requires all qualifications to include a “description of the qualification outcomes”.

Rather than introducing an additional description of graduate outcomes *outside* the qualification, we need to work within the current standards to ensure they operate effectively. This requirement needs to be enforced by ensuring that no training packages are endorsed without this information. If further or more specific detail is required to define this expectation more clearly, this needs to be added to the Standards.

CHAPTER 3 REFORMS TO THE REGULATORY FRAMEWORK

11. Evidence of assessment & graduate competency

The Standards for Registered Training Organisations have been in place for currently registered RTO's for only nine months at the date of publication of this discussion paper. We suggest that this is insufficient time to evaluate the effectiveness of the standards and introduce further reforms.

Further, any substantial changes to the Standards at this early time could signal, and possibly excite, instability and uncertainty within the national VET system and undermine public confidence in it. Instead, we need to focus on resourcing the regulator to monitor and enforce the standards adequately and seek ways to assist RTO's and trainers and assessors to work more effectively so that the standards are built seamlessly into their professional practice and organisational systems.

We do not support the proposal for training-only RTO's which could undermine the integrity of VET provision by building an arbitrary division between the delivery of training and the assessment of competence. Effective training outcomes require delivery that is aligned with assessment.

12. Enforcement

Assessment outputs are within the scope of the current Standards for RTO's. The regulator could expand its audit scope to include specific samples of student assessment for review against the rules of evidence.

ASQA's current enforcement powers include a range of sanctions. We see no need for additional regulatory enforcement options in relation to assessment other than those already available for breaches of the standards and of the National VET Regulator Act.

We believe that current regulatory practice provides adequate transparency and disclosure.

13. Cancellation and Re-assessment

ASQA should continue to exercise its right to cancel qualifications with caution and only in extreme circumstances. Clearly, impact on public safety should be a key consideration in deciding when to exercise this power.

Costs related to re-assessment in the event of cancellation of qualifications should be recovered from the RTO where the breach of Standards in relation to assessment occurred.

The re-assessment should be undertaken by any RTO with the relevant qualification on its scope of registration. Assessors undertaking the re-assessment should meet the requirements for assessors prescribed in the Standards for Registered Training Organisations. There should be the same assumption of standards-compliant assessment practice in the re-assessing RTO as there would be in any RTO. If there is any concern about systemic non-compliance in assessment within a qualification across a range of RTO's, ASQA should use its current enforcement powers to conduct a strategic audit, as it has done with early childhood education and care, aged care and equine industries, amongst others.

We do not support an RTO-funded tuition assistance scheme to protect VET students in the event of any cancellation of qualifications and/or re-assessment. As stated above, the cost of such events should be vigorously recovered from the offending RTO.