



## 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:  Individuals  Organisation
2. Full names:
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:

We are grateful for the opportunity to respond to this discussion paper. Both of us have long careers in Australian VET, both as practitioners and researchers. In addition we have authored or advised a significant proportion of the research and development material on VET teacher/trainer education and development as well the development of VET's assessment strategies. Some of this key research and developmental material is referenced at the end of this comments section.

In addition, one or both of us have:

- Developed resources designed to help improve assessment quality
- Been associated with developing the approaches used to assist in the validation and moderation of VET assessment
- Run a large number workshops with practitioners and policy makers directed at improving assessment quality
- Been involved in the development and review of initial VET teacher/trainer training and subsequent professional development, including the Certificate IV in Training and Assessment and Diploma of VET

- Conducted research into strategies for maximising confidence in assessment decision-making, e-assessment and Recognition of Prior Learning
- Conducted research into the nature and size of the VET workforce and, in particular, its teachers, trainers and other professionals
- Conducted the underpinning research into the feasibility of a VET professional association
- Informed the development of a range of capability frameworks for VET teachers and trainers
- Been involved in, or run, projects reviewing Australia's Training Packages.

This puts us in a formidable position of comment on this discussion paper and the specific questions it raises.

Before addressing the questions posed above and subsequently we would like to offer the following general comments:

1. Our concentration is on the content of chapters 1 and 2 of the discussion paper. We believe that no amount of attention to the regulatory approaches outlined in the third chapter will succeed without significant attention to the assessment capabilities of teaching and training staff and to industry's understanding of, and involvement in the determination of competence. However, we acknowledge that there are options available for changing, and possibly centralising, assessment processes, particularly those for higher risk occupations and qualifications. Deciding where such risk lies, and how best to deal with it, is by no means a simple task, however.
2. The paper tends to be too long-term in its focus, and the suggested approaches, particularly those in chapter 1, would take a considerable time to have any effect. If assessment quality is the serious issue it is seen to be, and surely it is, then more immediate actions are needed. Principally, these are best focused on improving the assessment skills of VET's teachers and trainers and working with industry to ensure a more nuanced understanding of what is entailed in competency-based assessment.
3. The paper lacks a strong contextual background, in particular how any issues with the quality of assessment might be linked to the make up, nature, experience and qualifications of the VET teaching and training workforce. We acknowledge that this is difficult to comprehend firmly as reliable data on the size, employment status and qualifications of the VET teaching and training workforce is almost non-existent in any consolidated form. NCVET's compendium of VET workforce data edited by Guthrie in 2008 and work by the Productivity Commission in its review of the VET workforce (Productivity Commission 2011) confirm the difficulty of getting accurate information and numbers for the VET workforce. This work also establishes that little is known about the movement into and out of the sector or the career paths of VET teaching and training staff. Nor is much known about the qualifications that VET teachers and trainers hold, both teaching and vocational. This type of information is important if there is to be a national approach to building a more 'professional' VET workforce and one that is better able to assess competently.
4. In addition, Guthrie et al. (2011) point out that approaches to initial and on-going training and professional development *might* need to be different, depending on the extent to which teachers and trainers identify with the VET sector and with teaching and training as a vocation. There are a variety of reasons why individuals become involved in VET teaching and training. Some see it as a career, others as a part-time job. The key point is that their level of attachment to VET teaching and training as a 'vocation' will help determine how much of a personal training investment they are prepared to make initially and then subsequently. Moreover, their often marginal attachment to the VET workforce means that they may not be eligible for substantive support in undertaking further and higher

teaching/training qualifications, or other forms of professional development focused on improving the quality of assessment. Therefore undertaking such further training or professional development is militated by the value they perceive they will gain from such participation. Thus, and in the present context, what do they personally get out of trying to improve the quality of the sector's assessment processes? Simply, is their personal investment worth the time, effort and money to them as many see themselves both as time-poor and not particularly well paid?

5. In addition, not only do they have maintain and build their teaching and assessment skills, they also have to maintain their industry currency and possibly build their management and leadership skills and qualifications for career advancement. Thus, they have competing professional development interests and priorities. Assessment is but one of these and has to take its place in these priorities. One way to ensure that it receives more emphasis is to offer incentives to individuals and their employing providers to undertake such professional development. Unfortunately, however, the sector and those who influence it are often far more fond of using the stick than the carrot! Carrots require funding, and there has been a reluctance to invest in supporting improvements to the quality of VET teaching and assessment at the organisational, jurisdictional and federal levels.
6. Research has shown that VET teachers and trainers are required to work in an increasing range of contexts and with a diverse student profile (for example, NCVET 2004). Harris et al. (2001) described an emerging model of a differentiated VET workforce comprising a core of permanent and highly skilled practitioners and a 'peripheral' group of contract and casual staff with varying degrees of attachment to the VET sector and the teaching role. The 'periphery' is often where VET teachers and trainers begin their work in the sector, so a qualification that helps to provide foundational skills is important, along with good induction and strong professional support from managers and the permanent teaching/training staff who can act as mentors as they begin this new type of work (Clayton et al. 2010). This is particularly important because the context in which they may be teaching or training, the characteristics of their learners and their particular vocational area and its individual learning culture are all different and almost impossible to address in any foundational program without ongoing support and the opportunities for contextualised reflective practice and other forms of professional development. The notion of an on-going commitment to professional development and support is a key element missing from the discussion paper. Rather, it focuses on the nature of the Certificate IV and who might deliver it, establishing a professional association and developing viable capability frameworks. While each is undeniably valuable in its own right, as a collective package of initiatives they ignore the fundamntal need to support initial and existing staff to undertake further professional development in a variety of forms and, in the context of the discussion paper, build their skills and expertise in assessment. ASQA's audits and our research shows that many practitioners are a long way from being expert in assessment. Thus, in addition to any other initiatives, there is a strong need to build in practitioners a thorough understanding and the practical skills to undertake effective and efficient assessment and make valid judgments about learner competence which are broadly accepted by industry.
7. ASQA mandates the minimum of a Certificate IV qualification for all teaching and training staff. However, there is considerable debate over the adequacy of this qualification for some teachers and trainers beginning their practice (for example, Clayton 2009; Guthrie 2010 a & b; Productivity Commission 2011; Wheelahan & Moodie 2011; Guthrie and Every 2013), with the debate focusing on the intrinsic worth of the Certificate IV in all its forms, its limitations as an initial qualification or the quality of its delivery. Clayton et al. (2010) found that, when taught well, the Certificate IV provides some if not all of the essential skills required of new practitioners, particularly if they already have some experience of training, are supported by mentors and undertake further developmental activities after they graduate (Our emphasis).

However, as Guthrie et al. (2011) point out, mandated minima can all too readily become the maxima in the absence of other compelling quality and professional development imperatives.

8. The working group for this initiative is at a very high level, and we are not sure of the role they had in developing or vetting the discussion paper. It would have been interesting if an expert group had been formed to advise this process made up of expert VET assessors and researchers with a background in VET assessment. Perhaps the formation of such group can be part of the outcomes of the next stage of the process to improve the quality of assessment?

Finally, a comprehensive and well-supported VET workforce development strategy is required. It needs to encompass both entry-level training and ongoing professional and workforce development. This development should be aimed squarely at enabling staff to critically reflect on practice and ensuring improvement where appropriate – especially that related to the way they undertake assessment and the decisions about competence that they make. Such approaches will certainly require greater investment by Governments and by individual providers as well. Such an approach was proposed by Skills Australia, and the proposal carried with it an associated and generous level of funding to support the implementation of the strategy. If similar funding has been made available to assist the development of academic staff in higher education and in schools, it seems appropriate that the VET sector teaching and training staff should also be supported as they were in the past through such programs as the Australian Flexible Learning Framework and Reframing the Future. To address the issues of this discussion paper an initial focus of such a strategy (and in what should be a broader agenda) could be assessment. The keys to using the funding approaches to support such a strategy most effectively are:

- establishing agreed priorities for teacher and trainer development, including assessment
- having generous levels of funding available to help support the strategy
- having a group of individuals, organisations or networks who can help implement the strategy
- moving from an events focus of professional development to one based on changing practice locally, or in key groups, and
- developing sound measures to judge the effectiveness of the implemented programs.

In relation to a focus on the TAE, its content and the providers that deliver it, we offer the following comments which address the questions posed above.

**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?**

Training.gov.au shows that there are around 750 providers with the Certificate IV TAE on scope. We believe this number should be radically reduced. As suggested the focus should be on those RTOs which will deliver the qualification with fidelity and rigour. Care must also be taken to avoid creating an artificial market for the qualification by mandating that all of those currently holding the Certificate IV TAE upgrade to a new and revised qualification. It will also be an issue to decide which providers should retain the qualification on scope and which should have it removed. In the first instance that might be achieved by one or more of the following:

- Removing the qualification from the scope of registration for those providers that have had no enrolments in the last 1 to 2 years and/or

- Auditing RTOs having large numbers of enrolments in the Certificate IV to ensure the quality of their delivery and, thus, enable them to retain the qualification on scope, or
- Requiring all RTOs offering the Certificate IV to 'show cause' why the qualification should be retained on their scope with responses required in a specified period. This approach might be progressively rolled out starting with those RTOs with the highest enrolment levels.

A similar approach might be adopted for the Diploma of VET and the 150 plus providers that have that qualification on scope.

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

Our belief is that should not be the case. The underlying assumption behind this approach is that RTOs will push their own through in order to qualify staff rapidly. While we acknowledge that there may be a few providers like this, our experience at our previous institutions suggests that they are generally diligent in their delivery as they are the end-users of the skills and knowledge developed. Rather, the greater problem was recruiting those with a TAE qualification attained from other RTOs where the quality of the qualification may be unknown, or poor. It is not uncommon in the sector for prospective employers to value qualifications from known quality-oriented RTOs rather than accepting the qualification at 'face value'. It is a clear case of 'buyer beware' with the Certificate IV.

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

RPL, if undertaken diligently by quality RTOs, should be an acceptable approach. RPL became a particular issue as VET teachers and trainers moved from the previous Certificate IV TAA to the current TAE. The qualifications were deemed by the Skills Council, IBSA, to be equivalent. Thus offering and granting RPL is appropriate. The greater issue is the quality of the qualification on which the RPL is based, but to deny the possibility of RPL to us would lack procedural fairness for the applicants.

### **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?**

See above. However, to us, the Certificate IV in particular is what it is: a starting point on a learning and developmental journey as a teacher and trainer and constant tinkering in attempts to make it foolproof are ill advised. What is more important is that faith in the quality of the TAE qualifications is built and diligently maintained, and this is particularly so for the Certificate IV.

Guthrie and Every (2013) suggested that consideration be given to:

- developing a skill set to provide an orientation to the VET sector. This skill set could then be undertaken by teachers holding specialist LLN or TESOL or other qualifications to provide an orientation to the VET sector
- developing skill sets focussed on advanced assessment and validation
- deeming a range of VET teacher, trainer and assessor qualifications as "equivalent" or relevant
- reducing significantly the number of providers having the Certificate IV on scope
- improving the quality of delivery by giving more attention to specific trainer requirements, modes of delivery, learner characteristics, range of training conditions, assessment measures and volume of learning requirements as delineated in the quality report from

Allen Consulting (Allen Consulting 2013). As a high risk qualification (Productivity Commission 2011) one immediate step is to ensure those who teach the Certificate IV have at least the Diploma of VET or higher and, in turn, raising the requirements for being able to deliver the Diploma of VET. Requirements to deliver the qualifications should also specify expected levels of experience and on-going professional development in teaching, training and assessment required of those teaching the key TAE qualifications. Those delivering the programs should also be recognised and endorsed for their excellence as a teacher /trainer/assessor. It is understood that these approaches are under active consideration, or are being adopted. Another approach could be to develop a new qualification, a Graduate Diploma in Assessment Practice, which will be developed by acknowledged experts in the assessment field, and which could be delivered by universities or TAFEs with HE arms under licence and audited not by ASQA but by an endorsed panel of expert Assessors. Assessment within this program would be practical and work-based

- providing access to high quality on-going professional development post-Certificate IV. This would include encouraging VET's teachers, trainers and assessors to undertake further and higher levels of qualifications or gain specialist or capability related higher level skill sets that may be consolidated and "redeemed" for a higher level qualification, or contribute towards the attainment of one
- discouraging inappropriate enrolments in the Certificate IV program by those who do not have the requisite skills or qualifications to enable them to provide teaching/training in a vocation or for a set of skills (that is: their learner characteristics are inappropriate as they do not have vocational skills or qualifications). This could be achieved through an adjustment to the entry requirement for the Certificate IV TAE. In addition these requirements could include a need to have access to an authentic training environment to develop and practise their skills. We believe that such an approach may also be under active consideration.

Finally, an important but missing question is: **What other approaches might be used to enhance the quality of assessment?**

Thus, while qualifications are very important, comprehensive, high quality and holistic approaches to professional development for the sector's teachers, trainers and assessors are also needed to complement and enhance formal learning experiences.

Initial and post-initial formal education and training for the sector's teachers, trainers and assessors is important, but is not enough. To provide the diversity and flexibility of education and training needed, a wide range of less formal programs is also required. This includes non-formal programs offered within VET institutions themselves, or by a range of other agencies, as well as informal learning and development which takes place in and through well designed normal work. This requires an appropriate learning culture at RTO level.

These less formal programs not only need to be substantive but also take place throughout VET teachers' and trainers' careers, beginning at entry. The process should begin with a program of induction and support which involves an orientation to the sector, the organisation and the work team. This can be enhanced with further programs of structured training, observation and supervision, collegial support, mentoring and professional networking to build on initially acquired

skills, knowledge and qualifications. Ways also need to be found to ensure that high quality non-formal learning can be recognised more readily in formal qualifications.

The answer to that question therefore is consider one or more of the following initiatives:

- Setting up and sustaining assessment-oriented communities of practice. Mitchell et al. (2006) pointed out the real value of such an approach. Regretfully, however, there is now little or no tangible support or encouragement for such professional development approaches in what is now a highly competitive training environment
- Developing quality resources to assist teachers and trainers to design and implement quality assessment approaches, including RPL. This approach might start with a stocktake of currently available resources, updating or consolidating only the best of these and developing new materials as needed. The resources could be made readily available on an appropriate portal
- Running an extended series of workshops and other substantial and sustained programs of professional development conducted by assessment experts who are licenced to deliver the programs
- Setting up and providing sustained funding to one or more specialist assessment centres that could work with providers and industry to develop, evaluate and validate assessment instruments and approaches as well as run professional development programs on assessment
- Ensuring a capacity for providing VET teacher/trainer education and training by the higher education sector is maintained, but that the qualifications offered meet the sector's needs. This may mean that the traditional models of university delivery are challenged, made more immediate and flexible to increase appeal, and that there is more active co-operation between HE institutions. Finally, VET sector staff with suitable assessment and other expertise should be involved in delivery of such programs.

#### **References cited:**

Allen Consulting 2013, *VET Quality Project: A report to Industry Skills Councils, the National Skills Standards Council and the Department of Industry Innovation Science Research and Tertiary Education*. Melbourne: Allen Consulting Group

Clayton, B 2009, *Practitioner experiences and expectations with the Certificate IV in Training and Assessment (TAA40104): a discussion of the issues*, NCVER, Adelaide.

Clayton, B, Meyers, D, Bateman, A & Bluer, R 2010, *Practitioner expectations and experiences with the Certificate IV in Training and Assessment (TAA40104)*, NCVER, Adelaide.

Guthrie, H 2010a, *A short history of initial VET teacher training*, NCVER, Adelaide.

Guthrie, H 2010b, *Professional development in the VET workforce*, NCVER, Adelaide.

Guthrie, H & Every, P 2013, *VET teacher, trainer and assessor capabilities, qualifications and development: Issues and options*, National Skills Standards Council, Melbourne.

Harris, R, Simons, M, Hill, D, Smith, E, Pearce, R, Blakely, J, Choy, S & Snewin, D 2001, *The changing role of staff development for teachers and trainers in vocational education and training*, NCVER, Adelaide.

Mitchell, J, Chappell, C, Bateman, A & Roy, S 2006, *Quality is the key: Critical issues in teaching, learning and assessment in vocational education and training*, NCVER, Adelaide

Mlotkowski, P & Guthrie, H 2010 Getting the measure of the VET professional: An update, in Guthrie, H. (Ed.) 2010 *Vocational education and training workforce data 2008: A compendium*, NCVER, Adelaide.

NCVER (National Centre for Vocational Education Research) 2004, *The vocational education and training workforce: new roles and ways of working – at a glance*, NCVER, Adelaide.

Nechvoglod, L, Mlotkowski, P & Guthrie, H 2010, National TAFE workforce study 2008, in Guthrie, H. (Ed.) 2010 *Vocational education and training workforce data 2008: A compendium*, NCVER, Adelaide.

Productivity Commission 2011, *Vocational education and training workforce: research report*, Productivity Commission, Melbourne.

Wheelahan, L & Moodie, G 2011, *The quality of teaching in VET: final report and recommendations*, Australian College of Educators, Canberra.

## 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:

#### **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?**

In responding to this question we note that greater benefit may be derived from access to further on-going professional development to build assessment skills and quality. What is proposed is a very front-end solution.

The proposal also raise the issue that, if the TAE is revised yet again to strengthen the focus on assesment, what will be left out of the qualification and what will be required of existing qualified teachers and trainers? Once again the solution is more about what is available post the Certificate IV and what is the nature of those who make the best VET teachers and trainers. When one asks teachers and trainers, students, managers and VET leaders what makes a good teacher or trainer, the attributes they identify include:

- Continually striving for personal and organisational development
- Delivering high quality training and assessment that maximises learning and provides a positive student experience, which requires a focus on student engagement and learning
- Fostering an engaging, interactive and enjoyable learning environment that includes addressing individual learning and assessment needs, providing prompt feedback and learning advice, closely monitoring student progress and reporting any concerns in a timely and appropriate manner. This requires strong communication and people management skills
- Maintaining a knowledge of - and adherence to - organisational standards, policies, procedures, work instructions, service guidelines and regulatory requirements
- Ensuring the maintenance of, and actively contributing to, the further development of all learning and assessment programs, and contributing to a process of continuous improvement
- Planning and preparing well, and completing and submitting accurate administrative and training records within required timeframes, and finally

- Supporting colleagues and senior staff by adopting a communicative, collegial, positive, professional and flexible approach to work.

**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?**

Our view is that such updates and changes in practice for qualifications such as those in the TAE package flounder on the altar of consensus. This was the case in the development of the TAA package and has been demonstrated by opposition to proposals such as increasing the level of qualification required to teach the Certificate IV to at least the Diploma of VET (as well as other initiatives to tighten eligibility to deliver that qualification). Thus it is important that expert individuals have the key say at the expense of interest groups who may wish to maintain the status quo or block potential improvements because of perceived disadvantages both financially and to the stakeholders they represent. Consultation is important, but doing the best to ensure that the sector is served by the best educated and developed teachers and trainers takes precedence in our view.

### 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:

In addressing the questions raised above we note:

1. The professional association approach represents a long-term rather than a shorter or medium-term solution to the quality of assessment. We estimate that it would take up to 5 years at least to get a sound national association established with a broad enough membership to be seen as credible by governments and members alike. Thus it is not as viable a solution to addressing the immediate and critical issues in the quality of assessment. The suggestions we have proposed earlier in this response are more likely to address the issues in the short-term.
2. Nevertheless, and as we found, there is value in establishing a national professional association, but more specifically it would need establishment funding from government over perhaps several years while it builds membership, services and credibility. It must also be - and be seen to be - independent of government. Thus, funding remains a very real issue, and the cost of membership needs to be balanced by and reflect the benefits membership brings. Member benefits need to be very tangible, and any new (Model B) or amalgamated association (Model A) has to offer much more than is presently available.
3. The barriers and issues in establishment were outlined in Clayton and Guthrie's paper cited in the discussion paper itself. Broadly, and from our consultations at the time, they are as follows:
  - a. There are natural suspicions about such an association even from those who support it in principle and so more work is clearly needed to help establish how it might work and if it is viable – part of which is being conducted in Queensland at present. The very size and diversity of the sector and those teachers, trainers and other staff who make it up makes the job of any single, national professional association difficult. This, we suspect, affects the speed at which such an association could be established and become viable (see point 1 above).
  - b. It will need the 'right' leadership and operational structures because a number of respondents to the survey and those in consultations were concerned that the association might be dominated – even high jacked – by particular individuals, voices and interest groups.
  - c. It will also need to recognise diversity of VET teachers and trainers and their roles, and be diverse itself, probably involving a potentially wide and growing range of special interest groups, as well as being accessible and relevant to those VET teachers and trainers working in particular jurisdictions and outside the major cities.

#### 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:

1. There must be a more national focus, and we suspect that current groups are finding it very hard to maintain viability due to their small size and limited influence.
2. When we finalised the responses to our survey, the activities and priorities for a professional association were seen (in descending order of importance) as:
  - a. Being a strong and respected voice for VET practitioners in shaping policy and practice
  - b. Fostering continuing professional development
  - c. Recognising excellence and promoting high standards of professional practice
  - d. Developing a code of professional conduct
  - e. Developing strategic alliances with a range of other organisations with complimentary interests in Australia and internationally

#### Suggested member services included:

- A website, including useful information, resources, forums and links
- Organised events, including conferences, meetings, special interest groups and PD programs
- A mentoring or support scheme
- An e-portfolio to document personal continuing professional development
- An awards scheme to recognise excellence

## 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:

1. Model A or B are both potentially viable, with A being the preferred option in our view as that would build on existing organisations and memberships. However these need to agree to come together. Model C is NOT a viable option because the registration focus is less appropriate in the VET sector than schools. In addition, registration needs to bestow a significant benefit to ensure that casual and sessional staff remain engaged.
2. Membership fees would sustain the association, but in adopting this approach we need to be mindful of the experiences of the Institute for Learning in the UK. It was found that when membership fees ceased being paid by Government membership dropped away. This gets to the nub of the issue: what is the value proposition for a VET teacher or trainer to join up to such an association when they may also be retaining membership and active involvement with associations in their vocational discipline? They have to perceive and realise REAL BENEFITS from membership. This is particularly so if membership were made mandatory, as it is for secondary teacher registration. Again, however, the highly casualised nature of the VET workforce would affect take-up, but classes of membership with a sliding scale of fees is one possible option that may be appealing.
3. We are inclined to propose individual rather than institutional (RTO) membership. This is important as individual commitment to the mission, vision and values and Code of conduct of a professional body are integral to the concept of professionalism. However, RTOs could agree to pay or subsidise membership fees for staff. We suspect, however, that they would subsidise those who are permanently employed or on contract rather than casual or sessional employees.

## 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:

1. There are a number of Australian capability frameworks, of which one at least is commercial
2. Those which are not are IBSA's and that of the College of Teachers in Queensland
3. A further framework is being developed in Victoria for their Department of Education and Training by a team from the University of Melbourne (L H Martin Inst.)
4. All address assessment issues, but the most value comes when teachers and others are able to assess their level of capability in key attributes such as assessment through the framework
5. Independent of the professional association, the level of their use depends on the extent of their acceptance and take up.
6. Again, however, we stress that these frameworks, while of some value, are more peripheral to addressing the quality of assessment than other initiatives discussed in the paper and this response.

## 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:

#### **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?**

It is important to note that not all Training Packages are of the quality they might be, and in this context this relates to the quality of the assessment guidelines and identifying those individual attributes, UoCs and groups of UoCs that are critical to determining competence. Thus, any improvements that can be made in assuring the quality and utility of guidelines before release would have significant impact on the quality of assessment. In addition, educators and industry could BOTH play an active role in the development of well validated and sound assessment guidelines. While this process can be industry led, industry representatives are not necessarily assessment experts and the voice of educators has been too long ignored in the process.

#### **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?**

One way of avoiding the need to validate assessments is to use industry-endorsed and externally administered assessments. However, considerable effort will be needed to ensure that industries and their employers understand and accept what would become a more consistent approach. Nevertheless, and despite its advantages, what might be sacrificed is the current flexibility of assessment arrangements, particularly if external assessment opportunities were only available periodically. This would undoubtedly affect attempts to implement competency-based progression and completion successfully.

Another approach might be to have independently certified or licenced assessors who could be called upon to assess as and when required.

This process might be strengthened if certified bodies developed and validated the assessment instruments and processes for Training Packages and these became endorsed components of the package. It might be possible for multiple assessment packages to be developed and the instruments and processes could be validated and endorsed by industry-led panels – but such panels should also include VET educators/assessment experts with particular expertise in the qualification or UoC(s) for which the assessments were being devised.

The greater use of soundly developed and pre-validated assessment instruments and processes should help increase industry confidence but again, if RTO staff were involved in implementing the guidelines, instruments and processes, appropriate professional development may be required to help ensure that they are assessing appropriately and with fidelity.

## 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:

We offer the following comments:

1. 'Industry' is a very hard term to define with any precision, as the borders between industry sectors are porous, and employers (who make up industry) are by no means uniform in terms of their expectations of the outcomes of VET programs. In short some set the assessment bar high, others far lower and there are all stages in-between. This complicates the assessment task enormously, but experience has taught us that assessment processes are better accepted when there is a strong relationship between the RTO and those who employ its graduates. Thus, 'industry' may be critical of VET's assessment and its outcomes generally, but if the relationships are sound it is likely that the outputs of the sector and the RTO are better accepted.
2. The assessment dilemma is that there is no uniform and industry expected standard. There will always be a measure of variation and a mismatch between what is expected and what can possibly be achieved in the training process. One of the ways of building industry capacity in assessment is direct and ongoing engagement between the RTO teachers and trainers and end-user employers, and enabling the feedback and insights gained to be used to improve the assessment process, whether centrally determined or not. The exchange of information that can occur in such collaborations can be highly influential in improving the outcomes of both training and assessment. Thus, even if centrally developed assessment tools and processes were introduced there would need to be a continued dialogue between end-user employers, RTO-based or independent assessors and those responsible for developing quality assuring and validation more centrally developed assessment processes.

## 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:

In our view it would have been far better had the paper actually proposed a range of alternative assessment models, what they involved and how they might work. We believe this would be a useful next step in any attempt to improve the quality of assessment processes.

We did not find this set of questions particularly helpful as it does not fit into a clear framework of alternative approaches. Thus, a next step might be to establish an expert panel and task them with developing a set of alternatives to be taken to 'industry' and the broader sector for consultation building on the feedback received on this paper. Such an approach was used in the second review of Training Packages under the auspices of a COAG working party and the NQC.

## 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:**

That these final two questions need to be asked, would suggest that the language of VET remains an impediment for all involved in the sector. Representatives of industry provide considerable input into the development of Training Packages with the expectation that the standards espoused therein, represent a set of graduate capabilities. Write Training Packages differently and more transparently and some of this problem will go away for employers, teachers and trainers - and more importantly learners.

We have been dogged by debates about competence and capability. Industry expectations that graduates will be fully competent on completing a qualification rather than job ready is unlikely to be realistic for many learners. Our research into competency progression and completion in apprenticeships found many employers acknowledged that competence takes ‘time on the tools’ and that is not possible unless they have played their part in ensuring that time is made available.

## 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:**

In our view further regulation is not the major issue here.

We believe that more attention to requirements for initial VET teaching qualification and on-going professional development in all its forms would be a better option.

In addition greater clarity over assessment guidelines in Training Packages would be a significant step forward, although other options such as developing high quality and validated assessment instruments and processes more centrally, which are then applied at RTO level would be a way forward worthy of consideration. If the tools are well developed and implemented, then the regulation issue becomes one of fidelity of implementation which present audit approaches can handle adequately.

## 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:**

See comments in relation to discussion questions in 11 above.

### 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:**

The issue cancellation of qualifications or re-assessment are being considered is of concern. To us, the focus MUST be on ensuring that the assessment processes are right and proper in the first instance. The notion of re-assessment would be an indignity on the VET system and lack procedural fairness. At worst, it would punish innocent students who have made an ill-informed decision about which provider to choose. All of this is in the context that 'perfect information' is available to advise user choice is almost impossible to attain.

This is the 'closing the gate after the horse has bolted' option!