![Australian Government - Department of Education and Training]

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:

   | Geoffrey Gwilym |

3. Organisation (if applicable):

   | Victorian Automobile Chamber of Commerce |

4. Please indicate your interest in this discussion paper:

   | Ensuring high quality vocational training and assessments for industry. |

   (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:

Clear evidence, for more than a decade, has shown that the delivery of the TAE qualifications has been badly eroded by some RTOs. Many parts of industry have demonstrated their lack of confidence in the delivery of the TAE and RTOs seeking to deliver a quality product have been undercut by RTOs who have been able to deliver a sub-standard product. The poor delivery of the TAE by some RTOs highlights an endemic issue in the VET system where multiples of RTOs are delivering qualifications at widely differing levels of quality, irrespective of highly engineered national competency standards. On this basis it would appear that any reduction of RTOs who deliver the TAE would provide an increased opportunity for regulators to manage these RTOs and to act swiftly where issues of poor quality are evident.

VACC supports the reduction of RTOs delivering the TAE Certificate on the basis that it provides an improved probability for a quality product to be delivered.

VACC supports a position for independent, external third party assessment for all vocational qualifications and this is reflected in other comments in this response. Regarding whether RTOs should be restricted from issuing TAE qualifications or skill sets to their own trainers, VACC's position

is that issues of quality in training and assessment should be managed and controlled by State and Australian Government regulators across all RTOs and all qualifications.

It is not sufficient to only ask this question as it relates to TAE qualifications as it is a question that should relate to all vocational qualifications. While there is an argument that some higher-level system integrity risks are associated with delivery and assessment of TAE qualifications, it is not understood why TAE qualifications carry more risk than other qualifications, for example, electrical, medical or aged care qualifications.

VACC's position is that a multitude of VET qualifications have a high risk profile that is largely mitigated through the provision of high quality training delivery and assessment. The question of restricted delivery should not be an argument limited to TAE qualifications but rather it should be cast across the entire VET system. VACC supports a position that all VET qualifications are subjected to independent third party external assessment.

Recognition of prior learning (RPL) is an integral part of the national training system. RPL is enabled across a wide a diverse range of vocational qualifications and this has assisted greatly in recognising existing skills and knowledge. Where questions of doubt have arisen around the validity of RPL for TAE qualifications this should be pursued by State and Australian Government regulators and in accordance with the Rules for RTOs to operate. If a failing in the capacity of the regulators has allowed for the poor use of RPL in the VET system then this question should be broadened to examine the capability of regulators. In keeping with VACC's position on third party and independent assessment of VET qualifications, this is also extended to the provision of RPL services; these should also be undertaken by the independent assessor.

TAE qualifications should be awarded on a provisional basis followed by supervision in the workplace. This model is practiced across many professionals as it allows for access to a qualification with the additional quality provisions being met through supervised delivery, mentoring and a recognition that applied learning provides a strong base for entry level employment in the professions. Completion of the qualification should be based on at least 200 hours of supervised practice.

The delivery of the Certificate IV and/or Diploma should be premised on the basis of the trainer holding a qualification above the qualification that is being delivered. This position would presume higher order skills and knowledge, being held by the trainer of the qualification and would, in theory, lead to an overall raising of course content, delivery and outcomes. This position also assists in creating career paths for VET trainers and removes a current anomaly in the system where an individual, once achieving a TAE qualification can almost immediately begin teaching others at the same level.

VACCs position is that external third party, independent assessors should be responsible for the provision of RPL, for all VET qualifications.

TAE qualifications should be provided on a provisional basis and be subject to on-the-job application with the support of a supervisor.

The delivery of the Certificate IV and/or Diploma should be premised on the basis of the trainer holding a qualification above the qualification that is being delivered.

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:

Assessment is a key area where the quality and validity of all VET programs is tested. It is strongly argued by VACC that all VET trainers, are at one time or another, responsible for the design and development of assessment tools. This may be in the form of complex materials designed to support the assessment of a one or more units of competency or simple assessment tools designed to measure the formative learning of their students on a day to day basis.

Even where this argument may be resisted by professional VET trainers who rely on external learning and assessment resources, it is contended that without the skills and knowledge required to design and develop assessment tools, they are left with a poor basis on which to make any judgement about the quality or validity of the products they are using. This would represent a major failing in the system, however it may also be a key weakness that has found the VET system short on this capability and with the outcomes one would expect.

Where reviews of the TAE have been undertaken, they are generally fraught with a multitude of opinions and professional postulations. It is unlikely that there are any other VET qualifications that attract as much attention and viewpoints, and this is to be expected given the broad range of stakeholders who have an interest in the qualification. It is however VACC's view that where a qualification that is so tied to the delivery of the nation's VET systems products, it should include a significant input from the regulator. Ultimately, the regulator is held accountable for the outcomes of the VET system, at a state and national level and is heavily criticised where the system fails. For the regulator to have the task of managing a system where it has limited capacity to influence the quality inputs in training, is an injustice and a situation which is likely to see the regulator lambasted for things it has little or no control over.

VACC supports the position to locate the competency unit, Design and Develop Assessment Tools, as a core unit in the Certificate IV TAE.

The VET regulator should have a significant input and even possibly an overiding infuence on the content of the TAE qualifications in so much as they undepin the quality in the system for which the regulator is responsible to manage and report on.

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:

VACC believes that the VET environment could be better served by a national VET association if it was aligned to VET practitioner registration. While various VET organisations have been established over time, they have only had limited success. One of the main detractors for any VET professional belonging to an association is that there is no requirement to do so. Like all associations, attracting members is highly reliant on a member perceiving they will achieve value for money and that the association will provide something to them they would not ordinarily be able to access, or not in the form the association has been able to achieve. Costs to belong to an association have no doubt played their part in the current lack of VET association engagement and given the liberal access to information, from multiple sources, the reason to join may just not be compelling enough.

The purpose for an association should be focused on raising industry standards and it should be aligned to on-going professional development that formed a requirement to register in the association and to maintain ones professional accreditation.

VACC would encourage the establishment of VET association where it had a link to registration but only where the fees to join an association did not form a barrier to entry.

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:

A national association for VET should have a high level focus on the professional development of trainers in the industry. Continuous professional development (CPD) should be a condition of trainer registration and the VET association should have the role of ascribing credits and maintaining a record of CPD from amongst its membership. The association may also take a lead role in promoting careers in the industry and in creating credit transfer arrangements from VET trainer qualifications into higher education qualifications, to support the career development of VET practitioners.

The association should not take the form of a political lobbying group on the basis this will likely exhaust much of the funding of the association and may lead to the development of factions who may have narrow interests that are not reflected broadly, or valued, amongst the association's constituents.

The construct of the association should be national in focus with state groups, so as to best reflect local and national needs.

Funding for the association should be borne from its membership and not supplemented with government financial support.

VACC supports and encourages the creation of a national VET association that has a mandate focuse on the development of trainers through continuous professional development (CPD). The association should be responsible for the ascribing of CPD values and should have a link to the continual registration of VET trainers. The association should be funded via its membership.

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

- Which of the suggested models for a VET professional association would be considered most preferrable 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:

Of the models presented, option B appears to provide a structure that includes the elements suggested by VACC in this response. Limitations with model A exist in that it seeks to use a range of current providers and entities that have specific mandates, commercial objectives and in some cases, may be politically aligned.

Mandatory membership fees linked to registration would be a mechanism for maintaining the viability of the association.

VACC suggests model B is the most viable, and where it is linked to mandatory registration and mandatory fees

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:

VACC is not convinced of the need to develop a capability framework for VET. It is possible that a framework will segment and potentially narrow the description of roles in the sector and this may create barriers to career progression. It is also likely that a quickly changing VET environment will require constant update and modification of a framework which will, in turn, lead to a maintenance burden.

Positions descriptions provided by employers seeking VET practitioners still provide the best match between workplace requirements and skills acquisition that should be pursued by individuals seeking specific job roles.

VACC is unclear as to the degree to which existing frameworks have been used or to the value they have afforded the system.

Without clear evidence that existing frameworks have provided value to the system or individuals VACC does not support the development of a new VET capability framework.

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:

The assessment of competency remains the central point at which confidence is built or lost in the national training system and with individual training providers. Whilst it is understood that costs associated with external validation for all qualifications may be unrealistic, there remains a lack of confidence where training providers, who are funded to deliver training, are also funded to assess the outcomes of their own training delivery. It is by no accident that the majority of students attending a full course of study are likely to exit as competent given a lack of incentive for providers to continue training individuals once their course funds have been exhausted. It could be argued that there is a perverse incentive for training providers to find students competent where a training provider has little access to additional funds, to continue training students who are repeatedly found to be not-competent.

Given the costs associated with industry involvement, in the conduct and validation of assessment, there would appear to be a strong argument for the provision of capstone testing, where it is informed, driven and delivered by industry. This position assumes that industry has an interest in ensuring students are competent while also having a view on the major, and high risk competencies that underpin, in this example, a competent tradesperson. Enabling industry-led capstone testing would also empower industry to ensure standards are being reached in the industry and to provide genuine inputs in the state and national training systems.

Given the relative simplicity of capstone testing, as opposed to highly complex units of competency, this is an area where industry can be realistically involved and where they have the capacity to establish industry based capstones for assessment.

Capstone testing already exists in some occupations, property and electrical for example and this form of testing has been favoured by regulators responsible for high risk occupations, for some time.

The management and delivery of capstone testing should be driven through industry groups given their representation for specific industries and their obligations to ensure competent personnel are entering their industry.

Capstone tests should be developed by industry and should have a direct relationship to summative outcomes expected from groups or individual units of competency.

VACC supports a position where industry have a direct and leading role to play in the conduct of assessment. This could be achieved through the application of industry-led capstone testing.

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:

Although RTOs have a regulatory requirement to engage with industry to ascertain the validitiy of their assessment model and tools, this is rarely implemented. As such, one method is to have industry play a key role in the validation of assessments through the creation of industry capstone testing. To ensure that such testing is in line with industry practice, industry should be involved in the auditing of the RTO by having a subject matter expert on hand to validate the assessment. Furthermore, the analysis of results obtained through the capstone test can be provided to the RTO as a continuous improvement strategy by highlighting inefficiencies in training and assessment and having the RTO address it within a specific time frame

Support and guidance for this role can be achieved through bodies such as employer associations, Industry Skills Councils or collective bodies representing major stakeholders. Definitions of 'industry' can be achieved through existing coverage reflected in industrial awards of via qualifications that are aligned to specific industry groups. It is accepted that in some industries, business for example, definitions of industry sectors can be difficult to achieve, however this should not limit those industries where these definitions are clearly prescribed and not in contention.

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:

The use of random validation of an RTO's assessment is a risk-based approach that will ensure that assessment outcomes is in line with industry expectations. Such a validation model can provide an industry snap shot of an RTO's current capability to delivery a quality outcome that meets industry expectations.

10. Discussion questions – industry expectations and graduate capabilities:

- Is there a role for Government or industry to develop resources outlining VET graduate expectations for particular training products? If so, who should take this work forward?

  – Do higher order issues need to be resolved regarding terminology such as 'competent' (as assessed against the training product) and 'job ready' (ready to undertake all aspects of a particular job)? Is there a common understanding of VET system outcomes?

COMMENT:
No comment provided

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

- 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:
Strengthening RTO standards will not have any improved impact on assessment income. The key question is what methods should be used when auditing an RTO. VACC believes that RTOs should be audited based on assessment outcomes as oppose to the assessment process. In addition, this auditing process should move way from criteria-based auditing to more process-based auditing. Doing this will take into account training outcomes and the employer's viewpoint.

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:
No comment provided

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:
No comment provided