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:

   | Dr Suljo Joe Husidic |

3. Organisation (if applicable):

   | Wiseman Institute Pty Ltd, RTO: 22434 |

4. Please indicate your interest in this discussion paper: | RTO & VET Practitioner |

   (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:

Point No1: All RTOs which satisfy criteria for the delivery of TAE Qualifications, should be allowed to deliver this qualification. Any artificial restrictions in this area will damage the integrity of national System for VET. Also, this can lead to discrimination against RTOs. Also, this can be a precedent for other similar restrictions to be imposed for other qualifications.

Point No2: All RTOs which satisfy criteria for the delivery of TAE Qualifications, should be allowed to deliver this qualification to its staff members. Any artificial restrictions in this area will damage the integrity of national System for VET. Also, this can lead to discrimination against RTOs and its staff members. Also, this can be a precedent for other similar restrictions to be imposed for other qualifications.

Point No3: RPL process is an integral part of our VET System. It should not be easily eliminated from assessment options for TAE qualifications, as it is a legitimate form of Assessment. The emphasis should be on correct deployment of RPL processes for TAE qualifications, rather than "artificial restrictions".

Point No4: Possible Changes to Delivery and Assessment of TAE Qualifications.

TAE qualifications and skill sets should be delivered by all practitioners who can demonstrate competence through formal qualifications / statement of attainment in respective units of competency. Any other restrictions in this area will damage the integrity of VET System.

Cert IV in TAE should be the lowest level of competence required for VET trainers and assessors. Diploma of VET or Higher (Bachelor Ed, Grad Dip Ed, MEd) should be mandatory for everyone involved in training of VET Practitioners at Cert IV Level / Diploma Level.

Should the TAE Certificate IV and/or Diploma require a practical component? Assessment process should be structured in a way that a practical component is embedded in the overall training and assessment process. I thought that all providers are already following this approach to the assessment process.

Should entrants to the TAE Diploma be required to demonstrate employment history in the VET industry before being issued with the qualification? The answer to this question is no as it can lead to discrimination and creation of "exclusive clubs". However, it probably make sense to make Cert IV in TAE a pre-requisite for Diploma Level.

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:

Point No 1: Should the TAE Certificate IV be changed to a core unit on the design and development of assessment tools? I don't think that this vould improve relability of the assessment prtocess. I thyionk that that the developers of training packages need to improve the desing of individual units of competency, including more explicit instructions regarding assessment & evidence requrements for individual units of competency. I think that it is relatively simple task to develop assessment tools, if the develoiper (trainer / assessor) is actually clear on what he or she is assessign.

- *Should the core unit be the existing TAEASS502B Design and develop assessment tools unit of competency?* No new units are required at Cert IV Level for this particular point. Developer of training packages need to do their job correctly, to enable trainers and assessors to develop good assessment tools, as part of the overall planning process for training and assessment.

- 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? Trainers and assessors need to learn at Cert IV Level how to develop assessment tools, as part of the overall planning process for training and assessment.

Point No 2: 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? Subject matter experts should make decisions, taking into account feedback from a range of different stakeholders, including learners, trainers, industry,..

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:

Point No 1: Is there a need to establish a national professional association for Australia's VET system? If the intent is to use this "national professional association" as an additional regulatory tool / arm, then it really does not make sense to have one more regulatory mechanism on the top of ASQA's regulatory role. This may lead to "a national dictatorship in VET System". If you combine this with a shady State Regulatory Framework for accessing different parts of market, through dubious "Registration Processes", then you will end with a toxic mix of "Exclusive Clubs", which are serving just their own interests.

Point No 3: What would be the most useful guiding purpose of a national professional association? We may need at the national level **an association for research and professional development**. All qualified practitioners would have access to this association, but it should not be mandatory to become a member in order to gain employment, as this will lead to all forms of discrimination.

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:

Point No 1: What activities would be most beneficial for a national professional association to undertake?

All points listed below in blue:

  – 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

  We need to be very cautious with this point:
  – **register VET practitioners?** All VET Practitioners should be encouraged to become members of the association, but it should not be mandatroy requirement in order to gain employment as a trainer / assessor.

Point No 2: 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? We could improve the following: commonication between practitioners, share ideas and expereiences, improve research within VET, improve practices, standardisation,…

Point No 3: Are there any existing organisations that could fulfil this role? Not really!!!

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:

Point No 1: 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? We need a model that is promoting research and development, professional development, standardisation,..

Point No 2: What mechanism would sustain a professional association, for example, membership fees from individuals or RTOs? Income from Value Addting Activites, such as: development of resources, delivery of training, assist with complaince matters,…., memebrship fees from individuals and RTOs, grants from Australain Governments.

Point No 3: Should VET teacher and trainer membership with a professional association be mandatory or voluntary? Membrship should be "voluntray" as we don't need "national distratorship in VET Sector".

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:

I think that we should manage compliance matters through ASQA and maters regarding research and development through a professional association. In this context we need to decide where these capability frameworks fit and place them under the compliance or association umbrella accordingly.

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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:

Point No 1: 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? As far as practical we should take TAFE / RTO to the workplace and conduct at least some aspects of the assessment process in real settings. If this is not possible, then TAFE / RTOs need to develop "training and assessment infrastructure", which will enable individual learners to develop skills and knowledge in settings, which are similar to commercial settings. "Training and assessment infrastructure" includes tools, equipment, documentation, facilities, products,.. Without adequate / valid "Training and assessment infrastructure" it is impossible to create "valid assessment process" by just developing so called "valid assessment tools". In this context RTO should be allowed to engage in commercial activities in their areas of expertise, to ensure that their training and assessment systems / process / practices are commercially fit. For example, if an RTO is involved in the delivery of Training and Assessment in Construction, then that RTO should be allowed to manage commercial projects in line their overall competence / business capability. Using this approach we would significantly improve validity of the assessment process and in the long run we would reduce RTO dependency on Federal / State funding.

Point No 2: 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? I disagree with all points listed below, as they don't make any sense. They just mean that more bureaucracy will be added to assessment processes, which are already extremely bureaucratic.

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?

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:

I think that we are complicating here unncesserily.

All RTOs need to ensure the following two points:

1. TAFE / RTOs need to develop "training and assessment infrastructure", which will enable individual learners to develop skills and knowledge in settings, which are similar to commercial settings. "Training and assessment infrastructure" includes tools, equipment, documentation, facilities, products,.. Without adequate / valid "Training and assessment infrastructure" it is impossible to create "valid assessment process" by just developing so called "valid assessment tools".

2. TAFE / RTOs need to ensure that their trainers are qualified and that they continue to work on projects, which are identical / similar to rela projects relevant for their training programs.

So called "validation from industry" can not be used as a cover up for "poor training and assessment" infrastructure and for "lack of competence" amongst trainers and assessors.

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:

I think that we are complicating here unncesserily.

All RTOs need to ensure the following two points:

1. TAFE / RTOs need to develop "training and assessment infrastructure", which will enable individual learners to develop skills and knowledge in settings, which are similar to commercial settings. "Training and assessment infrastructure" includes tools, equipment, documentation, facilities, products,.. Without adequate / valid "Training and assessment infrastructure" it is impossible to create "valid assessment process" by just developing so called "valid assessment tools".

2. TAFE / RTOs need to ensure that their trainers are qualified and that they continue to work on projects, which are identical / similar to rela projects relevant for their training programs.

So called "validation from industry" can not be used as a cover up for "poor training and assessment infrastructure" and for "lack of competence" amongst trainers and assessors.

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:

I think that we are complicating here unncesserily.

All RTOs need to ensure the following two points:

1. TAFE / RTOs need to develop "training and assessment infrastructure", which will enable individual learners to develop skills and knowledge in settings, which are similar to commercial settings. "Training and assessment infrastructure" includes tools, equipment, documentation, facilities, products,.. Without adequate / valid "Training and assessment infrastructure" it is impossible to create "valid assessment process" by just developing so called "valid assessment tools".

2. TAFE / RTOs need to ensure that their trainers are qualified and that they continue to work on projects, which are identical / similar to rela projects relevant for their training programs.

So called "validation from industry" can not be used as a cover up for "poor training and assessment infrastructure" and for "lack of competence" amongst trainers and assessors.

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:

I think that we are complicating here unncesserily.

All RTOs need to ensure the following two points:

1. TAFE / RTOs need to develop "training and assessment infrastructure", which will enable individual learners to develop skills and knowledge in settings, which are similar to commercial settings. "Training and assessment infrastructure" includes tools, equipment, documentation, facilities, products,.. Without adequate / valid "Training and assessment infrastructure" it is impossible to create "valid assessment process" by just developing so called "valid assessment tools".

2. TAFE / RTOs need to ensure that their trainers are qualified and that they continue to work on projects, which are identical / similar to rela projects relevant for their training programs.

So called "validation from industry" can not be used as a cover up for "poor training and assessment infrastructure" and for "lack of competence" amongst trainers and assessors.

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:

I think that the regulators are losing the sight of the purpose of the VET System, by concentrating almost exclusively on "assessment". I think that regulators need to recognise that there are 3 key stages along the learning pathway, which need to be carefully managed. These 3 stages are: (1) Pre-Training, (2) Training and (3) Assessment. I think that Pre-Training and the most critical stage in the entire learning process, yet it is not discussed in this paper at all. The second most important stage is training, and then assessment, which in reality cannot be separated from training.

How could the focus of regulation move to evaluating assessment outputs? Control Pre-training (input), rather than just controlling the output.

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? Control Pre-training (input), and the robustness of RTOs training and assessment infrastructure, rather than just controlling the output.

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? Control Pre-training (input), and the robustness of RTOs training and assessment infrastructure, rather than just controlling the output.

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? Control Pre-training (input), and the robustness of RTOs training and assessment infrastructure, rather than just controlling the output.

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? Control Pre-training (input), and the robustness of RTOs training and assessment infrastructure, rather than just controlling the output.

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:

I think that the regulators are losing the sight of the purpose of the VET System, by concentrating almost exclusively on "assessment". I think that the regulators need to recognise that there are 3 key stages along the learning pathway, which need to be carefully managed. These 3 stages are: (1) Pre-Training, (2) Training and (3) Assessment. **I think that Pre-Training and the most critical stage in the entire learning process, yet it is not discussed in this paper at all.** The second most important stage is training, and then assessment, which in reality cannot be separated from training.

We need to learn how to block poor performance at the Pre-Training Stage, rather than allowing inappropriate enrolments to take place and then developing a policing system, which deals with poor performance downstream.

We need to place fair and reasonable constraints of Pre-Training and as the second step we need to ensure that learners have access to valid "training and assessment infrastructure". If we control these two steps correctly, then assessment process will be in check by default.

Trying to control "assessment outcomes" without controlling the entire learning pathway is a total waste of time.