Dear Minister,

I am pleased to provide you with recommendations, developed by the Training and Assessment Working Group (the Working Group), to improve the quality of assessment in vocational education and training.

From our consultations and deliberations held over the last seven months, the Working Group has developed seven recommendations, provided for your consideration in the attached report. These priority areas are designed to improve assessment outcomes for learners through lifting the assessment skills of the VET workforce, enhancing industry involvement in assessment validation, strengthening regulation and providing consumers with information to increase confidence.

On behalf of the Working Group, I would like to thank you for the opportunity to work on such an important reform agenda. Should you wish to re-convene the Working Group to consider any further assessment reform matters, we would be happy to do so.

Yours sincerely,

Shane Thomas
Chair
Training and Assessment Working Group

2 May 2016
TRAINING AND ASSESSMENT WORKING GROUP

IMPROVING THE QUALITY OF ASSESSMENT IN VOCATIONAL EDUCATION AND TRAINING

MAY 2016
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Introduction

A number of reports have been published on the issue of quality in vocational education and training (VET) and the role of assessment. Most recently, the Australian Skills Quality Authority’s (ASQA’s) strategic review into training in the security industry, released in January 2016, raised concerns around poor assessment practices and inadequate trainer and assessor skills.

In September 2015, Senator the Hon Simon Birmingham, former Assistant Minister for Education and Training, established the Training and Assessment Working Group (the Working Group) to develop reform options to improve the quality of assessment in VET in consultation with stakeholders. The Working Group consisted of representatives from industry and the VET sector (Appendix A refers).

In November 2015, the COAG Industry and Skills Council (CISC) agreed the Australian Government Minister would consult with VET stakeholders and all jurisdictions on options to improve the conduct of assessment in VET. CISC prioritised three areas for investigation: approaches to strengthening the skills of VET trainers and assessors; consideration of improved validation of assessment, including potential for greater industry involvement; and options for tougher regulatory interventions.

Since its inaugural meeting on 6 October 2015, the Working Group has met nine times. Its terms of reference requested the Working Group explore the following reforms:

- Options to improve the capacity and capability of the VET workforce. Options may include a model for VET professional development and the use of capability frameworks. Considerations will extend to including the desirability and viability of a VET professional association and the functions such an association would fulfil.
- Considering changes to the design and delivery of the Training and Education Training Package (TAE) to ensure trainers and assessors skills appropriately prepare a trainer to conduct valid assessments. Consideration may extend to the application of restrictions to assessment and issuing of TAE to registered training organisations’ (RTOs) own employees and restricting the use of recognition of prior learning for qualifications within the TAE.
- How independent validation of assessment may be applied to be industry-led, flexible and risk-based. Of consideration would be whether best practice models are sufficient, an exploration of the various benefits and risks to mandating independent validation of assessment in specific instances, with general consideration to appropriate implementation and cost benefit requirements.
- Consideration of the role external validation or external assessment may play where learners were incorrectly deemed competent. Considerations will include options for external re-assessment of learners.
- Options to revise the Standards for Registered Training Organisations (RTOs) 2015 (the Standards for RTOs) to increase the applicability of sanctions by ASQA for breaches, such as the use of infringement notices.
To further support the Working Group in understanding the views of the VET sector, the Quality of assessment in vocational education – Discussion Paper (the discussion paper) was released in late January 2016 with a submission close date of 11 March. The discussion paper sought views on three broad themes to improve assessment—foundation reforms to the capabilities of VET professionals, reforms to the assessment of learners and industry engagement, and reforms to the regulatory framework. The discussion paper received 211 submissions from stakeholders including RTOs, industry bodies, regulators, VET practitioners and experts, state and territory governments and community members.

As part of its considerations regarding possible reform options, the Working Group also had discussions with VET experts (Appendix B refers).
Summary of recommendations

In developing the recommendations, the Working Group took into consideration feedback from the discussion paper, discussions with VET experts and members’ own experience, and discussions with the sector and stakeholders. In its deliberations, the Working Group was also conscious of not unnecessarily increasing the burden on employers, students and RTOs, or duplicating existing organisational structures and taking into account views from the sector on the degree of change fatigue being experienced.

The Working Group developed seven recommendations to improve the quality of assessment in VET.

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Recommendations

Approaches to strengthening the skills of trainers and assessors

1. Strengthen workplace learning requirements in the Training and Education Training Package Certificate IV and Diploma qualifications to include a practicum.

2. Strengthen entry requirements for the Training and Education Training Package Diploma qualifications by requiring entrants to have the Certificate IV in Training and Assessment. Additionally, commission work to ascertain the potential for improvements in quality that may result from requiring Training and Education Training Package Diploma entrants to demonstrate a defined period of practice in training and assessment.

3. Commission work to ascertain the potential for improvements in quality that may result from establishing a mandatory national registration scheme for all VET practitioners.

4. Review the professional development requirements in the Standards for Registered Training Organisations (RTOs) 2015 to establish a definition for, and minimum standard for participation in, professional development.

Rationale
The purpose of recommendations to change the TAE is to address the key findings in ASQA audits regarding the adequacy of trainer and assessor skills by ensuring VET practitioners are properly prepared to undertake valid assessments.

Including a practicum in the TAE Certificate IV and Diploma qualifications is designed to strengthen the skills of trainers and assessors by providing learners with the opportunity to demonstrate competence in the workplace prior to the issuance of the qualification.

Adding the Certificate IV in Training and Assessment to the entry requirements in the TAE Diploma qualifications is designed to strengthen the skills of trainers and assessors by ensuring entrants have sufficient training and practical experience to train future VET practitioners.

The Working Group agreed that while requiring entrants to TAE Diploma qualifications to have a period of practice in training and assessment may improve VET practitioner skills, further work is required to establish how and to what extent this would improve the conduct of assessment.

The Working Group considered whether the establishment of nationally-consistent, mandatory trainer and assessor registration would improve the quality of VET practitioners by limiting entry into the VET workforce. Some members of the Working Group expressed concerns over the cost of mandating registration of VET practitioners over the relative benefits. Further work is required to establish the extent to which quality may improve by establishing a mandatory, national registration scheme for all VET practitioners taking into account the costs of such registration processes.
Reviewing the professional development requirements in the Standards for RTOs will provide an opportunity to establish whether the current requirements are sufficient to support ongoing improvement in the skills of trainers and assessors. The Standards for RTOs currently require RTOs to ensure that all trainers and assessors undertake professional development. What the Standards for RTOs do not provide is a definition for acceptable professional development or minimum standard. The Working Group’s view was that a definition for what constituted professional development and a minimum standard for participation in professional development would ensure that trainers and assessors receive a consistent level of relevant professional development. This is designed to improve the skills of trainers and assessors, and the currency of their skills, which is expected to improve student experience.

**Submission analysis**

The majority of respondents to the discussion paper agreed the TAE was an important and critical qualification in ensuring minimum standards for the delivery of quality training and assessment in VET. Many respondents agreed that trainers and assessors who train future VET practitioners should have had practical experience in the VET sector. However, some respondents indicated concern that prior experience did not necessarily create a better practitioner, and the more important consideration was the capacity and capability of the trainer, and the quality of the program undertaken.

**Other considerations**

Since the establishment of the Working Group, the Australian Industry and Skills Committee (AISC) approved an update to the TAE to include an additional core unit into the Certificate IV in Training and Assessment on the development of effective assessment tools. As the addition of this unit was proposed in the discussion paper, the Working Group noted this decision. The Working Group also noted the update of the TAE. As the AISC determined the new qualification was ‘not equivalent’ to the previous qualification, the Working Group noted ASQA would be required to exercise regulatory scrutiny of RTOs seeking to add the new TAE training products to their scope of registration.

In addition to recommendations 1-4 above, on approaches to strengthening the skills of trainers and assessors, the Working Group examined options to limit the delivery and assessment of TAE qualifications. These included restricting the practice of RTOs assessing the TAE for their own staff, limiting the application of recognition of prior learning for TAE qualifications, limiting the online delivery of the TAE and mandating a minimum volume of learning. The Working Group’s view was these limitations were unnecessary at this point in time and the recommendations being proposed, if implemented effectively, would lead to improved assessment practices and reduced concern.

The Working Group also considered whether requiring or encouraging practitioners to hold higher-level qualifications in VET and adult learning would improve the conduct of assessment in VET. It was determined that this may not necessarily improve the quality of teaching and conduct of assessment.
5. Commission work to develop a mechanism in the training product development process to allow industry to propose, subject to demonstrated industry and/or occupational regulator support, specific independent validation of assessment requirements for the consideration of the Australian Industry and Skills Committee.

**Rationale**

The purpose of this recommendation is to ensure there are appropriate mechanisms and frameworks in place as part of the training package development process so that, should there be sufficient industry or occupational regulator support for independent validation of assessment, there is scope to include such a requirement in training packages and a clear understanding of what this means and how this would occur.

One approach discussed by the Working Group was that this could be part of the AISC work plan approval process. The AISC would consider any case put forward by industry reference committees for proposed independent validation of assessment and the evidence base that underpinned it. The case would need to specify the requirements for how independent validation of assessment would occur. If approved, the relevant skills service organisation would receive funding to undertake this work under its contracted agreement. AISC approval would be dependent on priorities and regulatory risk. As with the regular development of training packages, stakeholder consultation and support would be required.

The Working Group was not in complete agreement as to whether this model of independent validation of assessment was either necessary or appropriate and some members were concerned about regulatory impost and cost. There were also concerns that there is currently no appropriate framework or mechanism to assist with determining appropriate independent validation methods or determining risk. It was agreed that work be commissioned to explore this further.

As part of the work commissioned, consideration could be given to both independent validation of assessment tools and independent validation of assessment outcomes. Commissioned work could also consider a framework to identify specific criteria or risk factors.

**Submission analysis**

Some respondents to the discussion paper noted the strengthened Standards for RTOs, which came into full force on 1 April 2015, require RTOs to undertake systematic validation of assessment practices and judgements. The majority of respondents indicated that industry endorsed, externally administered tests are not viable as this undermines competency-based training and would rely on a level of industry engagement that is often difficult to achieve. It was noted by some respondents that externally administered tests are important and are already in place in some circumstances for licencing purposes or high risk qualifications.

It was also noted the general use of externally administered tests may risk undermining public confidence in the design of VET qualifications, the Standards for RTOs, the effectiveness of regulators and the assessment practices of all RTOs. A benefit noted by some respondents was that it provides a level of consistency for industry, but this is at a cost.
Some respondents identified a clear role for industry in validation of assessment, determining what industry needs in relation to skills and knowledge, with others arguing this already occurs during the training package development process and is not necessary in a separate validation of assessment process. It was noted that employers generally do not have the training and assessment experience required to contribute effectively to the validation of assessment and that it is a resource-intensive activity.

Risk factors for consideration identified in submissions included public safety, learner requirements, low completion rates, mode of delivery and industry needs.

**Other considerations**

The Working Group considered the improvement of independent validation of assessment by providing ASQA with a mechanism to target repeated RTO non-compliance against assessment requirements. It was determined by the Working Group that this would be better addressed in the development of training packages and that any further requirements for independent validation of assessment would be overly burdensome and costly for both RTOs and industry, if industry involvement was mandated.
Options for tougher regulatory intervention

6. Review the sanctions available to the Australian Skills Quality Authority, including the effectiveness of existing powers and whether additional powers are required to address perceived weaknesses.

Rationale
A review of ASQA’s sanction powers would assist to ensure the regulatory framework provides ASQA with adequate tools to address assessment issues in the sector, particularly in the context of repeat offenders. The review would consider whether changes to ASQA’s powers should be made.

Submission analysis
Responses to the discussion paper expressed mixed views about whether additional powers are required. Some respondents indicated that they perceive the problem to be the way in which existing powers are applied. A review would canvass specific options for change and assist in establishing whether there is clear evidence base for any changes which might be taken forward. The review would also consider the appeal mechanisms available to RTOs and whether change is required to address repeat non-compliance.

Other considerations
The Working Group considered whether the regulatory framework should better support providers focusing on the delivery of training as opposed to assessment. The Working Group was of the opinion that separating the training and assessment aspects of RTOs on a wider scale would not be beneficial. Key concerns included the limited accountability which RTOs delivering only training would have, and a view that high-quality training cannot occur without an understanding of how high-quality assessment is developed and delivered.

Whether ASQA should have the ability to direct the reassessment of individual learners where there were identified issues with the RTO’s assessment processes was also considered. These options were considered too burdensome and costly. The Working Group saw the impact on learners as an overriding concern which precluded consideration of a power to mandate reassessment.

The Working Group also considered improving VET practitioners’ understanding of the protections and responsibilities they have in relation to reporting an RTO’s non-compliance. The Working Group agreed this issue fell outside its Terms of Reference and should be progressed separately by the Australian Government.
Provision of information to the VET sector

7. Strengthen the mechanism in the training product development process to facilitate the creation of statements for employers and VET graduates outlining expected VET graduate capabilities.

Rationale
The creation of plain-English, accessible statements for employers and graduates is designed to improve industry confidence in the VET sector by enhancing understanding of what the achievement of a competency based qualification should mean in terms of workplace capability and the ability of a graduate to perform relevant work.

Improving the knowledge base and expectations of employers and learners in terms of what workplace capability would stem from VET qualifications also has the potential to enable learners and employers to become more informed and demanding when selecting a RTO and/or a qualification, as they would be more aware of what should or should not be realistically expected of a graduate in the workplace.

Submission analysis
In submissions, there was strong support from the sector to clarify terminology such as ‘job ready’, ‘competent’ and ‘proficient’ and ensure employer and student expectations are realistic and consistent with the training products.

Other considerations
The Working Group also considered the development of best practice assessment guides for RTOs to support their assessment processes, but determined that unless they were mandated they were not likely to have much effect on quality and the Working Group was not supportive of recommending mandatory observance of best practice assessment guides.
Conclusion
The Working Group was tasked with considering reforms to improve the conduct of assessment in VET. While a range of options were actively considered, the Working Group focussed its recommendations on approaches to strengthening the skills of VET trainers and assessors, consideration of improved validation of assessment and options for strengthening regulatory interventions.

Responses to the discussion paper and consultations with VET experts provided valuable insight into the perceived problems and viable solutions to assist with improving assessment outcomes.

The Working Group strongly considered potential regulatory impost against the potential for improvement in quality to put forward the final action-focussed recommendations for the Minister's consideration.
Appendix A – Training and Assessment Working Group membership

The Working Group is comprised of industry and training leaders, regulators, peak bodies, employer and worker organisations, including:

- Shane Thomas, Crown Entertainment (Chair)
- Chris Butler and John Churchill, Enterprise Registered Training Organisation Association
- Rod Camm, Australian Council for Private Education and Training
- Tanya Cole, Hessel Group
- Stephen Conway and Gail Eaton-Briggs, TAFE Directors Australia
- Darrell Cox, Thiess Australian Mining
- Ian Curry, Australian Manufacturing Workers Union
- Paul Edginton, VET Advisory Board and SYC Limited
- Megan Lilly, Australian Industry Group
- Suresh Manickam, National Electrical Communications Association
- Patricia Neden, Australian Industry & Skills Committee and Innovation & Business Skills Australia
- Chris Robinson, Australian Skills Quality Authority.
Appendix B – Consultation with VET experts

As part of its deliberations regarding possible reform options, the Working Group had discussions with VET experts, including:

- Ms Jodi Schmidt, Chief Executive Officer, TAFE Queensland (VET practitioner capabilities).
- Ms Patricia Neden, in her capacity as CEO of Innovation Business Skills Australia (TAE Training Package). Ms Neden is also a member of the Working Group.
- Professor Erica Smith, Faculty of Education and Arts, Federation University (independent validation of assessment).
- Ms Sharon Robertson, Executive Director, and Chris Stewart, Manager, Strategy and Organisational Capability, VETASSESS (assessment, reassessment and independent validation of assessment).
- The Hon Michael Lavarch AO, Commissioner, Australian Skills Quality Authority (regulation).
- Ms Sandra Lawrence, Director, Guide On Side (independent validation of assessment).
- Dr Josie Misko and John Stanwick, senior research fellows from the National Centre for Vocational Education Research (independent validation of assessment and VET practitioner capabilities).
- Dr John Mitchell, Managing Director, John Mitchell & Associates (VET practitioner capabilities).
- Ms Lynn Glover, Director of the Victorian Registration and Qualifications Authority (regulation).
- Ms Stephanie Trestrail, Executive Officer of the WA Training Accreditation Council (regulation).
- Professor Keiko Yasukawa, Professor Jill Downing and Professor Erica Smith from the Australian Council of Deans of Education, Vocational Education Group (VET practitioner capabilities).
- Associate Professor Shelley Gillis and Ms Andrea Bateman, University of Melbourne (independent validation of assessment and the report of the state and territory pilot studies).