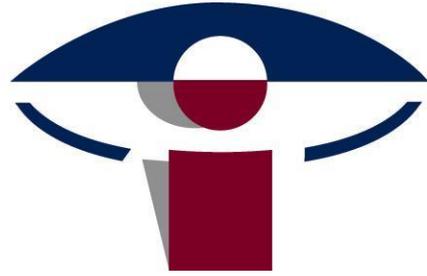


Victorian TAFE
Association



**Quality of Assessment in Vocational Education
and Training (VET) - Discussion Paper**

Submission from Victorian TAFE Association

January 2016

Introduction

This submission is made by the Victorian TAFE Association (VTA).

The Victorian TAFE Association (VTA) is the peak body for Victoria's public vocational education and training (VET) providers. VTA members include four dual sector Universities and twelve stand-alone public TAFE Institutes. VTA members offer a diverse range of programs and services delivering and supporting technical education, and have close relationships with industry - including large, medium and small enterprises. In addition, its members comprise four technologically oriented dual sector universities: RMIT University, Swinburne University of Technology, Victoria University and Federation University. Five Victorian TAFEs deliver their own higher education qualifications, and all have close working relationships with universities.

On behalf of our members, the VTA welcomes the opportunity to respond to the Quality of Assessment in Vocational Education and Training (VET) - Discussion Paper.

Where required, the VTA is happy to clarify or augment this submission. Please contact:

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Quality of assessment in VET

The VTA recognises and supports the Australian Government's concerns for the quality of VET assessment and the need for reforms to 'improve the quality of assessment of student training outcomes and enhance confidence in the sector' (*Discussion Paper* p.5). These concerns are also recognised as being reflective of the concerns expressed by the Australian Skills Quality Authority *Annual Report (2014-2015)* that identified 'ongoing issues with training programs delivered in very short timeframes with insufficient training for the full development of industry competencies' (p.16) and 'ongoing concerns about the poor quality of assessment, and the skills of assessors, across the sector' (P.17).

The Victorian TAFE Association has consulted widely across its membership (TAFE Institutes and dual-sector Universities) to inform this VTA submission.

The VTA fully supports the Australian Government's objective to improving confidence in the VET sector by ensuring VET teachers and trainers are the strongest platform for high quality assessment. VET teachers and trainers are the key to appropriate and effective assessment of vocational competence.

Chapter 1: Foundation Reforms

1. RTO limitations

VTA members support a reduction in the number of RTOs / providers delivering the TAE qualification or skill sets. To ensure high quality TAE training and hence qualifications, provision should be limited to a restricted group of RTOs who have been deemed to be of the highest standard.

The development of categories of providers, as has been proposed through the Victorian VET Funding Review is strongly supported by the VTA as a strategy for limiting the number of RTOs delivering the TAE qualification to Registered Training Organisations (RTOs) who are able to demonstrate the highest standards of delivery and assessment. Alternatively, this could also be achieved through the application of a more rigorous addition to scope approval process for the revised Training and Assessment qualifications when they are finally endorsed by the AISC – or a combination of both strategies.

It is important to note however, that the Standards for Registered Training Organisations (2015) already apply additional levels of requirements to improve outcomes for these qualifications. For example, there are increased TAE trainer and assessor requirements and independent validation of TAE assessment tools. These additional requirements will not be fully in place until 1 January 2007. The impact of these changes should be carefully considered before creating further changes to requirements.

A limited, high calibre group of RTOs delivering the TAE should work as a 'network' or 'community of practice' for moderation and validation of assessments to ensure there is consistency in delivery and assessment of the qualification across the system.

Assessing our own staff

Even if the delivery of the TAE is limited to a core group of providers, some VTA members maintain that internal assessment of colleagues creates a conflict of interest. This can be easily avoided by insisting that staff must be trained and (or at least) assessed by another provider.

Recognition of Prior Learning

VTA does not support prohibiting the use of Recognition of Prior Learning (RPL). Recognition of Prior Learning is a fundamental element of a competency based assessment process – as such it should continue to be available for TAE qualifications. Risks associated with inappropriate utilisation of RPL as a tool of assessment will be mitigated through the limited delivery and assessment of TAE by a small number of high calibre RTOs.

Improving assessment skills through TAE qualifications

VTA members support the introduction of additional requirements for the Diploma of TAE. Additional requirements for the Diploma level qualification should include a minimum length of time

in the VET industry as well as a practical component not dissimilar to that required for school teacher registration (as administered in Victoria by the Victorian Institute of Teaching). Entry to the Diploma level qualification should be limited to students who have worked a minimum of 12 months (EFT) in the VET industry. Whilst the Certificate IV TAE qualification should require a practical teaching component (practicum) to complete the qualification.

The VTA members also recognise that there have been additional requirements for the practice of skills and applied knowledge, built into the latest/pending TAE 40110 qualification.

2. Skills and qualifications of trainers

The VTA recognises that teacher development of assessment tools is an observable weakness in TAE trained staff, which adversely impacts on the quality of student assessment.

The TAE 40110 is the entry point to the VET teaching profession the core unit TAE ASS401B *Plan assessment activities and processes* provides a base for further development of competency. Additional requirements for this unit or as additional electives suggested by VTA members include;

- Much more practice at 'unpacking' some of the new, more prescriptive Training Packages
- Specialist electives for blended learning, workplace assessment, RPL, assessing individuals and groups.

Some institutes believe that the unit TAE ASS502B *Design and develop assessment tools* should also be included as a core unit (or a mandatory elective). This would enhance the outcomes of the TAE and provide additional scope towards operating as a qualified and competent trainer. Whilst this is a more specialised unit, it localises assessment more so than any other core unit in the TAE. The TAE ASS502B reinforces and extends the assessment learning within TAE ASS401B, deepening the abilities of VET teachers for the benefit of students and industry.

3. VET professional Association

VTA strongly endorses the development of a professional association for VET teachers, in particular for the development of a robust system of ongoing professional development.

Whilst VTA members support the notion of a professional association, we are concerned that a national association must be cognisant and mindful of the inherent complexities of managing individual state and territory requirements.

Similarly, the VTA is reluctant to see any VET trainer and assessor registration be added on to an existing registration networks such as the Victorian Institute of Teaching. Instead the VTA recommends the establishment of single, not for profit, state-based association, not part of any other existing registration body, which would serve the specific needs of Victorian VET practitioners.

Barriers to a national professional association

VTA members have identified the various barriers to the establishment of a national professional association. Both scale and individual state or territory requirements have already been identified (above) as barriers to the establishment of a national professional association.

In addition, the VTA recognises the need for individual, professional staff to be accountable for their own professional conduct and ongoing development. Whilst there was general agreement from the VTA members that registration with the professional association should be mandatory, there was a genuine concern for how this impacts on casual staff and staffing. The VET sector is staffed by an increasingly casualised workforce, many of whom are industry experts whose commitment to the RTO less than 4 hours per week. The requirement to be registered with a professional association may be seen as too onerous for some, which may lead to a reduction of industry expertise in VET.

The VTA recommends a 'soft start' approach where practitioner registration in the first instance is compulsory for permanent and ongoing staff with a gradual expansion of the program over time.

Another challenge for a VET teacher professional association is whether to service both the (often competing) needs for *vocational* and *educational* competence. Quality VET teaching relies on both teaching capacity and industry currency. A registration system would ideally manage and monitor both, but we recognise that this does create greater administrative complexities than exist for teacher registration bodies in other sectors.

4. Potential activities of a professional association for VET teachers

A professional association for VET practitioners would undertake a range of activities that support the maintenance of teacher competence and currency including:

- Registration of trainers and assessors
- Facilitate the documentation of teacher and vocational/industry currency
- Manage and mandate *Working With Children* checks
- Set and manage professional development standards and requirements in response to changing needs of the VET sector
- As for other professional bodies, establish a PD 'points system' to assist individuals and employers to record, retain and track their professional development activity
- Develop and implement a VET practitioner code of conduct
- Set standards for TAE delivery, oversight TAE delivery, and create forums for TAE moderation
- Manage and maintain a registration of industry partners who actively support and facilitate VET trainers and assessors in developing and updating industry knowledge
- Act as an advocate for VET teachers and assessors.

5. A model for a VET professional association

VTA advocates for Model B (in the *Discussion Paper*) as the preferred model for a VET professional association. It recommends the establishment of a separate VET professional association endorsed to undertake a range of functions including the development of professional standards and a capability framework and promotion of professional development and practice. As previously stated the majority of members do not support this as a national organisation, instead the VTA recommends the establishment of these as (potentially networked) state-based organisations.

Where VTA members expressed interest in the establishment of a national association this was identified being reflective of a National VET Standards Framework and a National Regulator and the recognition that a national association would allow the VET sector to be represented alongside other professionals which hold a national registration board.

VTA supports the establishment of a professional association where membership is both a regulator requirement and an individual professional requirement. As such, the payment of membership fees should be an individual responsibility. Practitioners who are not registered with the association are ineligible to work as a trainer and assessor in any RTO.

Further, fees must contribute directly to the future professional development for teachers, trainers and assessors.

6. Capability Framework

The VET Practitioner Capability Framework (VET PCF) – including the three levels of practitioner skills identified – is an important body of work that reflects the skills and knowledge required to be a competent VET practitioner. This important foundational work should be utilised as the framework for the establishment of standards for the VET practitioner association.

It is important however, that the language used in the VET PCF creates expectations that will need to be universally and consistently applied across the VET sector. Interpretation is an individual reality: without appropriate specification or if there are multiple, ongoing variations, capability frameworks can be misinterpreted and therefore misappropriated. Ensuring stable, set criteria, without flexibility or room for loopholes, guarantees that parameters are maintained. It further defines the knowledge, skills, behaviours and attitudes assist in maintaining professional integrity. This, it would seem, is paramount to 'TAE accreditation' in narrowing the field of TAE issuing bodies.

Chapter 2: Reforms to the assessment of students

7. Increasing industry confidence

The VTA recognises that across Australia, there has been a significant reduction in industry and public confidence in the VET sector's ability to deliver work-ready graduates, to business. The VTA believes TAFEs – as public providers of VET – are the cornerstone of both high quality and accessible VET.

Increasing industry confidence in the VET sector will need to be public provider leadership. It must address the ongoing reputational damage of the sector created by the well-publicised 'roting of government funding' and 'inadequate delivery of training' by private RTOs.

In terms of the suggested approaches for increasing industry confidence, the VTA *does not* support the introduction of any forms of additional testing of student competency, beyond that already undertaken by the RTO. The VTA *does not* recognise independent validation as a viable strategy for increasing industry confidence in our sector. VTA members view the introduction of additional layers of testing as a knee-jerk reaction to a minority of RTOs not training or assessing students with rigour and vigilance. As expressed in the existing regulatory framework, it is the RTO's responsibility to deliver quality training and assessment. Introducing an additional requirement for the external, summative student assessment of would cause unnecessary duplication of work and additional administration (a burden on RTOs, students and employers).

Furthermore, an exam-based approach to independent validation is the antithesis of competency based assessment and therefore an inappropriate assessment tool for the majority of VET qualifications.

The VTA does recognise that many education systems are fitted with standardised, externally validated testing; and the VET sector is an exception to this. Any consideration of standardised testing must address the challenge of operating this premise in the multitude of diverse contexts that are specific to localised industry needs.

8. The role of industry in assessment

The VTA is concerned about industry's capacity to serve the function as independent validator of assessment. In our current VET system, industry expertise shapes the content of Training Packages and locally, shapes RTO curricula. Industry professionals know their industry and should not be held out to be experts on assessment. The VTA sees value in professional development for RTOs on how to best utilise industry expertise to inform assessment practice.

The VTA also recognises that there is already a number of qualifications in 'high risk' industries (nursing, plumbing, electrical) that require industry validation. The VTA acknowledges these as exceptional cases and we do not support the introduction of blanket, independent validation of all qualifications.

There are however, a range of alternatives for improving industry confidence in the VET sector, such as: the development of industry led quality ratings of RTOs or graduates; an industry led Star Rating of RTOs; or the creation of a list of preferred providers for particular qualifications.

VTA members also suggested increased industry involvement in developing universal and independent assessment tools *in collaboration with VET professionals*. Assessment tools could be standardised across the VET sector (especially in areas of high risk) to reduce the risk of inappropriate assessment. This model combines the respective strengths of industry and VET, in assessment.

9. Independent validation of assessment

The VTA agrees with the statement that ‘one size fits all’ is not appropriate for independent validation. Moreover, the VTA does not consider external testing or validation of assessment, as the best means to manage high risk RTOs: this is the role of the regulator. The VTA welcomes a review of the regulator, which may need additional powers or resources to serve its regulatory function more effectively.

Where an RTO was deemed to have provided insufficient assessment, independent *re-assessment* by another RTO should be conducted on the whole cohort at the expense of the non-compliant RTO. The VTA recognises that re-assessment is a vexed issue for students who may have been deemed competent in the first instance and are found to be not-competent by the subsequent RTO. Risks to students and their current and future earning capacity need to be carefully considered in this discussion.

The VTA suggests that delivery of high risk qualifications could be limited to RTOs who are deemed to be of a particularly high quality.

10. Employer expectations and graduate capabilities

The VTA supports the development of stakeholder resources that outline VET graduate expectations for each particular training product.

The provision of ‘plain language’ documents is essential for improving both the student and employer understanding and expectations of a graduate’s ability to perform specific job roles at different AQF levels. These should be national resources, produced and maintained as part of the training package renewal process. These documents should recognise that graduates will continue to need to be exposed to a variety of on the job and off the job learning opportunities to maintain and improve their skills.

The VTA believes that these resources can also assist in student decision-making.

Chapter 3: Reforms to the regulatory framework

11. Evidence of assessment and graduate competency

The VTA maintains that current RTO compliance standards sufficiently articulate expectations for high quality assessment. Increasing RTO compliance requirements increases the administrative burden but does not inherently improve the quality of assessment.

However, VTA considers it prudent to revisit some of the Standards, especially where the language used has created 'loop holes' and gaps in practical application. The Standards must continue to evolve in response to inappropriate interpretations that have unforeseen limitations or consequences.

The focus for improvements to VET quality should be on ensuring that regulators are sufficiently empowered to oversee and take action against RTOs who are not compliant within the existing framework of regulations.

12. Enforcement

Where an RTO has failed to comply with regulation standards, the VTA insists that the regulator should have the power to force RTOs to arrange and fund external re-assessment, regardless of the size of the RTO nor the number of students involved. The third party re-assessment should be conducted by a regulator-endorsed provider.

Penalties must mirror the severity of the offence. Where the RTO is non-compliant in the same qualification more than once, this qualification should be removed from the RTO's scope of registration. Repeated non-compliance for multiple qualifications indicates a systemic problem within the RTO, which may require more significant intervention by the regulator.

13. Cancellation and Reassessment

The VTA recognises that a decision of the regulator to cancel a qualification is a significant decision with serious consequences for the RTO and the students. Any decision to cancel a qualification must be based on significant evidence to – and consideration by – the regulator.

Whilst high risk qualifications may appear to be a priority for reducing the potential for public risk, all qualifications should be considered as a priority to ensure all VET qualifications are seen as valuable in the Australian economy.

The VTA recommends the development of a clear strategy to protect students in the Australian VET sector against the burden of re-assessment or the disqualification of a qualification. The VTA suggests the establishment of a Commonwealth funded support service for impacted by regulatory intervention. As public providers with extraordinary regional reach across the country, TAFEs could be contracted to provide some of these support services.

The VTA also sees merit in the establishment of a Tuition Assurance Fund to support students who have accrued VET FEE HELP debts where no (or minimal) training has been delivered. Students who have had their qualifications withdrawn and find their employment adversely impacted, should have access to income support eligibility and be entitled to a standardised level of compensation (equivalent to the costs associated with undertaking the qualification) from the Tuition Assurance Fund.

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