



Response to *Quality of assessment in vocational education and training* Discussion Paper

Introduction

SkillsIQ welcomes the opportunity to respond to the *Quality of assessment in vocational education and training* Discussion Paper. SkillsIQ provided the opportunity for Chairs of its allocated IRCs to provide feedback and a number of Chairs have taken the time to respond with input on behalf of their represented industry sectors. The following represents a consolidation of the responses from those IRC Chairs who provided feedback.

Impact of the *Standards for Training Packages*

SkillsIQ and its stakeholders believe opportunities exist for improved assessment practice that lifts industry confidence in quality Vocational Education and Training (VET) outcomes. Whilst such opportunities exist, consideration must also be given to the impacts of the *Standards for Training Packages* which are yet to be fully realised and documented.

The *Standards for Training Packages*, endorsed by the Standing Council on Tertiary Education, Skills and Employment in 2012, were established to ensure nationally recognised training products are of high quality and meet the workforce development needs of industry, enterprises and individuals.

The new Assessment Requirements component in training packages developed to the *Standards for Training Packages* provides the opportunity to improve assessment practices to industry-required standards. The prescriptive nature of the performance evidence and knowledge evidence, together with the opportunity to specify assessment conditions (both for workplace and simulated environments) go some way to addressing issues of quality in assessment.

In complying with the Standards, volume and frequency of assessment, assessment conditions, and requirements for assessors are clearly mandated within each individual unit of competency, such as specific requirements in some units of competency for face-to-face, hands on workplace experiences and specified client numbers and types. Following are three examples of the different ways in which the Assessment Requirements have been implemented to assist in ensuring that assessment practice results in high quality outcomes that meet industry needs.

HLTHPS007 Administer and monitor medication – Assessors must satisfy the *Standards for Registered Training Organisations 2015/AQTF* mandatory competency requirements for assessors. In addition, assessors must be a registered nurse or registered enrolled nurse or registered Aboriginal and Torres Strait Islander health practitioner.



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CHSCCS023 Support independence and wellbeing – Performance evidence; performed the activities outlined in the performance criteria of this unit during a period of at least 120 hours of direct support work in at least one aged care, home and community, disability or community service organisation.

SITHCCC020 Work effectively as a cook – Assessment conditions provide extensive and clear definition of the equipment, resources and organisational specifications that must be present during assessment to accurately reflect industry work environments, as well as a mandatory requirement for assessors to have at least 3 years industry experience.

The *Standards for Training Packages* have provided industry and VET practitioners with an opportunity to improve assessment practices. They also simplify statements of industry requirements and redefine competency, specific to performance required in the workplace.

Quality assessment is strongly supported by industry to improve learner outcomes. Some of the recent changes to training packages will require industry to be much more involved in assessment than previously, especially where the completion of work hours or workplace assessments have now been stipulated. In some training packages this has never previously been defined. It is noted that stakeholders caution further changes when the full impacts of the *Standards for Training Packages* are yet to be apparent in the system.

Increasing Industry Confidence

Q. 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?

Q. 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?

Industry confidence in the quality of assessment varies, with stakeholders providing differing levels of satisfaction with assessment outcomes. However, stakeholders are united in the view that any additional requirements must be carefully considered, in order to create no further burden on industry, nor place additional administrative pressures on providers that would detract from the provision of quality training and assessment. Any additional requirement for increased industry involvement in the conduct of assessment would need to be properly resourced to achieve quality outcomes.

It is important to note that industry already provides a substantial contribution in regards to assessment. The 2015 *Standards for Registered Training Organisations* require training providers to implement a range of strategies for industry engagement, to ensure industry relevance in their training and assessment strategies, practices and resources. In addition, changes to training packages, as a result of the 2012 *Standards for Training Packages*, will require industry to be more engaged in



the conduct of assessment through the inclusion in some training packages of required workplace hours and/or workplace assessment, as well as potential for increased use of co-assessment models.

In some sectors, the function of licencing authorities and peak bodies plays a pivotal role in assuring industry confidence in VET graduates. These sectors indicate confidence in existing structures and as a result, may have a lesser need for assessment intervention or further engagement.

Enrolled Nursing is a licensed vocation and the oversight of graduate quality has been placed largely with the licensing authority, the Australian Nursing and Midwifery Accreditation Council (ANMAC). ANMAC assesses course providers for approval to deliver but does not actively participate in assessment validation, adopting instead a risk-based approach to the ongoing quality assurance or audit of approved providers. This is sound practice and consistent with other quality assurance approaches. Consequently, there is little involvement by industry (defined as employers) in the practice of validating assessment decisions for consistency.

However, it has also been reported that in some sectors, compliance driven licensing is putting employers under increasing pressure to ensure an employee is “ticked off”, with less regard to the quality of their work, so it is clear that licensing requirements alone do not always result in quality outcomes.

Industry stakeholders, where licencing or regulation does not exist, have greater concern for the quality of outcomes of assessment. These stakeholders support the notion of independent external assessment as a means of increasing industry confidence.

It should also be noted that in the case of enterprise Registered Training Organisations (RTOs), an employer will often deliver and assess beyond the standards prescribed within training package components, based on organisational expectations and job role requirements.

Additionally, in some areas there are professional associations which endorse VET qualifications for use as professional accreditation standards. For example, the Australian Community Workers Association (ACWA) has been endorsing VET qualifications in the Community Services training package for use for professional accreditation standards over many years.

The Victorian Department of Health and Human Services employs a large number of child protection workers and practitioners. According to the Department’s guidelines, qualifications for careers in the child protection program must be professionally accredited. The Department has set specific mandatory requirements for diploma qualifications. Diploma qualifications must be delivered and assessed over at least two academic years of full time study (or part time equivalent) and include minimum 400 hours fieldwork placement. These courses must be accredited by ACWA.

It is important to note that these requirements are set above training package requirements. The development of a complementary approach between employer requirements, where this is above those set in the training package, and professional associations that endorse courses as professional accreditation standards, may encourage alignment of employer needs (where they exist) with learning outcome requirements and may help to increase industry confidence.



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Should external assessment be adopted, stakeholders largely agreed that assessment must be independent of the involved employer and training body and provided by an industry endorsed individual or organisation with the requisite skills and background to undertake assessment to an industry standard. It was also noted that such agencies would need to be adequately funded and resourced to undertake such activities. Further, should independent assessment be implemented, the role of RTOs may need to be examined to determine if their scope should be limited to training delivery, with assessment being conducted by the external body. The separation of training delivery and assessment would allow for verification of skills and competency independent of the training delivery process.

Programs developed to support and recognise quality assessment have proven useful in guiding best practice outcomes as defined by industry. The Right Way Program is an example of an existing mechanism for external and independent validation within the VET system.

Right Way is a national accreditation program developed to support and recognise the delivery of quality training in the service industries. Industry experienced Right Way Advisors assess and evaluate the standards of a provider's trainer/assessors, facilities and resources. Where standards are met and comply with the pre-determined criteria, the provider is issued with formal accreditation. Each Right Way Assessor is appointed based on currency of industry experience, expertise in operational practice and industry knowledge. Right Way accreditation gives assurance to industry, employers and learners, that the provider reflects an industry defined standard.

Newly formed IRCs and their members may be well positioned to play a key role in determining the appropriate structuring of any external assessment mechanism and in providing overarching guidance to its function. This would be dependent upon the IRCs being comprehensively representative across their sectors, on a national basis. Adequate funding and resourcing would also be required to support such a venture.

The role of industry in assessment

Q. 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?

Q. 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?

Q. Is there a need to build industry capacity and capability regarding involvement with training and assessment? If so, how might this be done?

Q. How can the VET sector 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?



There are differing views from stakeholders on the extent to which industry should be involved. However, a consistent message was that the interest of, and imperatives for industry, lie in the outcomes of assessment and informing this process.

It was broadly agreed that the interpretation of “who is industry?” varies according to sector, but that in relation to VET, industry can largely be defined as the employers who will engage the graduates of a completed VET qualification or training course.

The current *Standards for Registered Training Organisations* (RTOs), under clause 1.6, require all RTOs to implement a range of strategies to engage and use the input of industry to inform the development of, and relevance of, training and assessment strategies, practises and resources.

Direct engagement between employers and training providers ensures advice provided is reflective of enterprise specific and local industry workforce skills needs. Where this contextualisation and localisation occurs, candidates are assessed in the context which they are likely to be employed and hence industry’s confidence in the outcomes of VET qualifications and training is commensurately higher.

The complexity and variability of VET related factors such as reasonable adjustment, access and equity, evidence and performance standards, evidence collection modes, documentation and record-keeping standards, and principles of evidence, all combine to dissuade industry from active involvement in the assessment process. This expertise, in the view of industry, should be provided by the VET sector, whereas intelligence from industry should be used to inform the nature of assessment activities. Training providers must make involvement accessible to industry through the provision of information presented in a manner that industry is able to understand and relate to. In addition, industry must be able to see their investment reflected in the outputs of assessment, that is, in quality graduates.

Many employers, particularly in small businesses, reportedly feel apprehensive regarding their ability to participate in assessment practices where there is insufficient guidance offered by training providers. They report feeling that assessment is complicated, time consuming and having little awareness of the importance of their input and how it is utilised. Given the potential increase in industry involvement in assessment, with additional Assessment Requirements such as work placements and the potential for increased use of co-assessment models (where the RTO and the employer each have a role in gathering the evidence of competency of a candidate), it is imperative that training providers work closely with employers to build awareness and capability. Increased understanding and familiarity of employers in regard to what is expected will in time, reduce the pressure many employers feel, when expected to participate in assessment.

Q. Should independent validation be mandatory for qualifications that are deemed high risk?

Industry supports additional measures to support areas deemed ‘high risk’ where no pre-existing structures are in place, or such structures are widely viewed as inappropriate or have proven ineffective. Thorough consideration must be given to the practicality and resourcing of any measures



proposed for implementation. Proposed measures would need to receive support from appropriate industry advisory groups such as IRCs and industry peak bodies.

The definition of 'high risk' qualifications also needs to be considered and will be addressed later this submission.

Any requirement for independent validation should be determined on a case by case basis and in consultation with the concerned industry. This allows industry to be fully involved in the manner and composition of methods to be employed in that industry.

Many high risk vocational areas have existing layers of independent verification of competence through licensing mechanisms or similar controls. For these industries, current measures may be sufficient and additional requirements may not be necessary.

Q. 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?

External assessment should be considered on a situational basis. Individual employers have expressed limited interest in being involved in such a process, given the cost and time burden involved.

The current, and often significant, contributions already made by employers should be recognised. Some employers engage learners in work placement where time, resourcing and support is offered to ensure a quality experience of a learner in a live industry environment.

However, external assessment by organisations staffed by industry practitioners with experience and currency could provide added confidence for employers, particularly where qualifications are in high risk areas, or highly specialised areas, such as embalming.

Q. 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?

Assessment of 'risk' for the purposes of potential independent validation would need to take into account a range of factors. Public safety would be an important consideration, as would the characteristics of the student cohort and the attributes of the RTO.

Any risk assessment, however, would need a considered approach as existing structures may already exist to mitigate risk, particularly where there are questions of public safety.

Basing risk on a student cohort perspective allows for particular aspects of various cohorts to be taken into consideration, for example those with language, literacy or numeracy issues, but also runs the risk of discrimination when applied as a 'one size fits all' assessment.

The RTO profile may provide some insight into potential risks concerning quality of assessment, however, if an RTO has a poor record, for example a history of failing audits due to substantive



issues of practice, it may be that tougher regulatory action and monitoring would be more beneficial than the introduction of independent validation of assessment. Likewise, an RTO that has a satisfactory record in regards to passing audit, may yet have shortcomings in regard to assessment practices.

An important consideration not identified as a factor when considering risk is the safety of the worker. Where a person is working in a high risk environment, ensuring competence is paramount for safety.

Industry expectations and graduate capabilities

Q. 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?

Plain English descriptors of the skills outcomes of training products may be of use to some industry sectors. The provision of well-articulated information, free from VET terminology, detailing qualification alignment to job roles and how they differ across AQF levels would assist employers in forming realistic expectations of graduate capabilities.

However, there remains a high level of information asymmetry with regard to quality. Many small or regional employers have no mechanism for identifying what are quality outcomes of training. Based on feedback, the level of capability varies widely in relation to national qualifications and often depends on where the person was trained. The divergent understanding of VET outcomes and expectations of graduates may be exacerbated in some sectors, due to the variability in the outcome of VET graduates across RTOs. Where an employer has had varying experience with VET graduates, especially where training and assessment practices are questionable, confidence in the VET system overall is decreased.

Therefore, having clearly defined graduate expectations for training products along with, as mentioned previously, some form of industry accreditation process, small or regional employers would be afforded an increased level of confidence that graduates have industry standard skills, rather than the minimum standard. This also needs to take into account existing licensing and regulatory requirements that exist in some industries.

Again, the newly formed IRCs and their members could play a key role in identifying industry's expectations of VET graduates, but this would be reliant on their composition being fully industry representative and the introduction of such a structure would need to be underpinned by adequate funding and resourcing.

Q. 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?

The concepts of "competent" and "job ready" are viewed differently by stakeholders. This is generally influenced by their personal expectations and experiences, although the concept of entry-level skills,



and capability progression over time, through the acquisition of experience on-the-job, is common to all industries.

It is noted that national training products cannot be expected to meet the requirements of every workplace or employer and thus, it can be argued that the notion of training products providing “job ready” graduates is impracticable. Rather, the idea of a graduate being “skills ready” and then being flexible enough to adapt their skills to the systems and process of the workplace is seen as more realistic. Employers have an obligation to ensure that induction is provided to all new employees to provide them with the opportunity to understand the systems and processes specific to that workplace and then apply their skills. This is of particular importance for newly qualified graduates.

Cancellation and reassessment

Q. 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?

Q. Should a scheme for the reassessment of students be implemented?

If an individual is deemed to possess a qualification where they may not be competent across the requirements of the associated units of competency, or the assessment is proven to be inadequate to allow competency to be demonstrated, then the qualification should be cancelled, particularly where there are concerns relating to public safety and risks posed to the employer and the individual.

It is noted that decision making regarding cancellation of qualifications must be evidence based and carefully considered. In industries where licensing mechanisms are well established, cancellation of a qualification issued by an RTO to a cohort of students could signal a failure of regulation and licensing, not just the non-compliance of an individual RTO.

Any cancellation of qualifications, due to lack of competence and inadequate assessment, should only occur within a specified time period following the qualification issuing. Ongoing issues of competence, for example where an employee completes a qualification covering a set of skills and subsequently does not use those skills for a period of time, which then impacts their ongoing competence in those skills, should be dealt with through ordinary mechanisms, such as refresher training.

In regard to reassessment, the RTO concerned should bear the responsibility for correcting inadequate assessment, inclusive of the associated resourcing costs. Where an RTO is not deemed fit to reassess, the candidate should be afforded opportunity to undertake the required steps to achieve the desired qualification. A scheme that provided for reassessment, along with any required gap training at no cost to the student would of course be ideal, however, the question of who would fund such a scheme remains, and therefore, it is deemed more important to ensure that RTOs are assessing properly in the first instance, to negate the need for such a scheme at all.

Access to student support systems allowing learners to voluntarily identify where they feel their assessment was inadequate, or where they feel that they are not competent to the requirements of the



qualification should also be provided, as a means to reduce the impact and occurrence of the need to revoke qualifications.

Conclusion

It is evident that in giving consideration to improvements in assessment outcomes a 'one size fits all' approach is not appropriate. Attempts to improve assessment must be driven by industry need and occur at a localised level, with a detachment from VET terminology and processes that often restrict industry's full engagement.

SkillsIQ would like to reiterate the opening remarks regarding the yet to be seen impacts of the implementation of the *Standards for Training Packages*. Until the effects of the implementation of the Standards on the outcomes of training have been observed, additional change should be considered with prudence and careful contemplation of the impact of further change.

In closing, SkillsIQ would like to acknowledge and provide support for the efforts taken to enhance assessments outcomes and ensure the system delivers quality outcomes for industry.

11th March 2016.