Quality of assessment in vocational education and training – discussion paper
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About RITC

The Resources Industry Training Council (RITC) is a state government funded joint venture between the Chamber of Minerals and Energy of Western Australia (CME) and the Australian Petroleum Production and Exploration Association (APPEA) providing strategic advice on the workforce development needs of Western Australia’s mining, oil and gas and downstream process manufacturing industries.

Members of these peak organisations account for over 95 per cent of mineral and energy production in Western Australia and over 90 per cent of national oil and gas production.

The Western Australian resources sector is diverse and complex, covering exploration, processing, downstream value adding and refining of over 50 different types of mineral and energy resources.

In 2014-15, the value of Western Australia’s mineral and petroleum production was $99.5 billion. Iron ore accounted for approximately $54 billion of production value, being the state’s most valuable commodity. Petroleum products (including LNG, crude oil and condensate) followed at $24 billion, with gold third at $9 billion.\(^1\)

Notwithstanding the recent decline in the price of several export commodities, the estimated value of royalty receipts received by the state from the resources sector still composed over 16 per cent of estimated total state revenue in 2015-16, or around $4.4 billion.\(^2\)

As at September 2015, there was approximately $171 billion in resources sector projects committed or under construction in Western Australia and a further $110 billion in proposed or possible projects.\(^3\)

Western Australia’s downstream process manufacturing industry is concentrated and, like the resources sector, is diverse in nature covering activities such as basic chemical and chemical product manufacturing, polymer and rubber product manufacturing, non-metallic mineral product manufacturing and primary metal and metal product manufacturing. Combined, these industries account for around 2.5 per cent of employment in this state (2011 ABS census).

Recommendations

The RITC considers the discussion paper’s proposed series of reforms are at best problematic and at worst providing potentially additional layers of cost and bureaucracy to participants in the vocational education and training system without any promise of tangible benefit. In saying this, it is acknowledged the issue under consideration is an inherently complex. The RITC makes the following recommendations:

- The RITC supports an additional level of quality control for the Training and Education (TAE) Training Package, in particular the Certificate IV in Training and Assessment qualification, as suggested in the discussion paper.

- The central importance of the TAE qualification to VET system outcomes demands the qualification be given particular treatment and its delivery restricted to a small number of specialised, high quality training providers in each state and territory.

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\(^3\) DMP, 2015, *loc. cit.*
Enhancing the professionalism of VET sector staff is supported by the RITC. A number of organisations already exist with this as an aim (eg Australian Institute of Training and Development). Consequently, establishment of a VET professional association would be seen as duplicating existing structures and is not supported.

The RITC supports the notion of introducing risk-based independent validation of assessment process to the VET system as a means of enhancing the quality of assessment.

The RITC contends the employer should have a determinative role in assessing competence in the workplace.

VET regulators may have a role to play in maintaining a register of suitably qualified and experienced industry technical experts who may be engaged in the independent validation of assessment process.

The independent validation of the assessment process must also involve the observation of RTO’s practically deploying their assessment tools – ie the process of assessment rather than just the validation of assessment tools without observation of the actual assessment.

The RITC believes existing administrative measures which give providers the capacity to continue training delivery and assessment during rectification periods is inappropriate where a sufficient level of risk is apparent.

VET regulators should have the power to conduct spot audits of RTOs in high risk industry areas which would involve the observation of training delivery and assessment.

Where VET regulators identify RTOs with inadequate assessment practices, a capacity should exist for such providers to have their assessment activities independently validated until it can be demonstrated they can meet the required standards. Furthermore, the cost of this process should be borne by the RTO.

Context

The RITC appreciates the opportunity to make a submission on this important matter to the resources sector. Quality assessment is fundamental to ensuring outcomes from the vocational education and training system meet industry skill requirements. At present, the quality of assessment in the vocational education and training system is not consistent, leading to a lack of industry confidence in system outcomes.

In a presentation made in March 2014, the Australian Skills Quality Authority Chief Commissioner, Chris Robinson highlighted:

- Audits of existing RTOs conducted between 1 July 2012 and 31 December 2013 showed only 23 per cent of registered training organisations (RTOs) were compliant against the standard relating to quality training and assessment (SNR15);
- This increased to 76 per cent following rectification action by the RTO;
- SNR15.5 (Assessment done properly) was 27 per cent increasing to 76 per cent following rectification action.

This provides evidence from a regulatory perspective of the systemic issues associated with the quality of assessment in the vocational education and training sector.

A number of audits have identified systemic failures in the assessment function by RTOs which have served to further erode industry’s confidence in outcomes of the Australian VET
system. Unchecked, this erosion in confidence has the capacity to bring into question the significant industry and government investment in the system.

Against this backdrop, the RITC believes a ratcheting up of regulatory measures across the VET system will not necessarily deliver the necessary improvements in quality of assessment. A series of measures and reforms implemented as a package is seen as the only way to effectively tackle deficiencies in the assessment process.

The RITC supports some suggested measures outlined in the discussion paper and recognises some inherent challenges which will be faced in their potential implementation.

The crisis in confidence in our VET sector has never been more apparent. VET FEE-HELP rorts by RTOs exposed in the media have become a chillingly regular occurrence and underscore a need to develop a set of policies and measures to restore public confidence that our VET sector has a valuable and critical role to play in supporting our standard of living and economic well-being.

Against this backdrop, timing of the quality of assessment discussion paper could not be better.

**Foundation Reforms**

As stated in the discussion paper, the existing Certificate IV in Training and Assessment qualification provides an entry-level qualification for professional trainers and assessors in the vocational education and training (VET) system (eg TAFE or private training provider staff).

As the central or core qualification in the VET system, industry confidence in training providers delivering this qualification and the quality assurance arrangements surrounding its delivery and assessment are critical. The RITC supports an additional level of quality control for this qualification as suggested in the discussion paper.

In fact, the RITC believes the central importance of this qualification to VET system outcomes demands the qualification be given particular treatment and its delivery to be restricted to a small number of specialised high quality training providers in each state and territory. This would have the effect of improving the quality of delivery and assessment for the Certificate IV in Training and Assessment qualification and therefore the quality of overall delivery and assessment in the VET system.

While recognising there are challenges with this approach, the RITC is confident it would deliver long lasting benefits to all concerned and have a positive impact on improving the quality of assessment undertaken in the VET system.

To maintain industry perceptions of quality, it is imperative Registered Training Organisations (RTOs) delivering the TAE qualification either:

- be restricted from issuing qualifications to their own staff; or
- if allowed to do so, the assessment decision must be independently validated by another RTO.

The existing TAE qualification is largely designed for the “training industry” and in particular, trainers and assessors who are employed by RTOs and spend the majority of their time in a classroom setting. Conversely, much of the training of workers in the resources sector is done by employees with significant technical and vocational expertise and knowledge, tasked with the delivery of skill-based training and coaching to others in the workplace. An alternative qualification needs development for this latter group which is fit for purpose.

Enhancing the professionalism of VET sector staff is supported by the RITC. A number of organisations already exist with this as an aim (eg Australian Institute of Training and Development). Consequently, establishment of a VET professional association would be seen as duplicating existing structures and is not supported.
Reforms to the Assessment of Students

The RITC supports the notion of introducing a risk based independent validation of assessment process to the VET system as a means of enhancing the quality of assessment.

A “one size fits all” approach is not applicable and may introduce unnecessary limitations to delivery and assessment. Rather a risk-based approach, as outlined in the discussion paper, be utilised in the determination of which delivery areas should be subject to the independent validation of assessment. This could be in response to regulatory authority audits, industry based factors (eg high risk work) or for providers in receipt of specific funding.

Ideally, the independent validation of assessment should take place with the express participation of industry given its central position in the vocational education and training system and to ensure industry has maximum confidence in outcomes from the training and assessment process. The RITC contends the employer should have a determinative role in assessing competence in the workplace.

It is understood the capacity for industry to participate directly in any independent validation of assessment process is not uniform. Presumably, those employers with the greatest stake in ensuring outcomes from the VET system meet their requirements will recognise the benefits of being actively involved in the process.

VET regulators may have a role to play in maintaining a register of suitably qualified and experienced industry technical experts who may be engaged in the independent validation of assessment process. This would go some way to ensuring such a workload is as evenly distributed as possible across industries which have indicated a capacity or willingness to allocate resources to supporting the independent validation of assessment process.

The independent validation of assessment process must also involve the observation of RTO’s practically deploying their assessment tools – ie the process of assessment rather than just the validation of assessment tools without observation of the actual assessment.

It is noted in some areas of training delivery and assessment (eg high risk work) there are nationally mandated assessment tools which aims to improve the consistency of outcomes. It may be possible to extend this approach through the incorporation of assessment tools in training packages, should this be a position agreed to by industry through the relevant Industry Reference Committees. A consultative process with industry would assist in determining appropriate assessment tools valid to industry.

Reforms to the Regulatory Framework

Evidence suggests the current regulatory system is not capable of identifying and responding to issues with assessment in a timely manner.

VET regulators seem unable or unwilling to take the necessary action to address poor quality training delivery and assessment. The requirement to provide procedural fairness must be balanced against issues such as public safety or the safety of communities or individuals. The RITC believes existing administrative measures which give providers the capacity to continue training delivery and assessment during rectification periods is inappropriate where a sufficiently high level of risk is apparent.
For example, providers of high risk work training and assessment found to be critically non-compliant in assessment during an audit should be prohibited from delivery and assessment during any rectification period(s) to ensure individuals and the public at large are not subject to risks emanating from people who have been deemed competent by a not yet competent training provider.

Consideration should also be given to the management of credentials issued by RTOs prior to a finding of critical non-compliance to ensure industry confidence in the system and its integrity are maintained. This could include, for example, the RTO being required to fund an independent validation of the original assessment decision.

To enhance the quality assurance mechanisms in the system, **VET regulators should have the power to conduct spot audits of RTOs in high risk industry areas which would involve the observation of training delivery and assessment.** This would ensure providers not only have valid assessment tools but can implement them to deliver the acceptable quality of assessment outcome.

Where VET regulators identify RTOs with inadequate assessment practices, a capacity should exist for such providers to have their assessment activities independently validated until it can be demonstrated they can meet the required standards. **Furthermore, the cost of this process should be borne by the RTO.** It can be expected such a measure would generally assist in improving the quality of assessment undertaken by RTOs.

**Conclusion**

The RITC welcomes the opportunity to participate in the broader discussion around the quality of assessment in the VET system. Options contained in the discussion paper are likely to polarise stakeholders in the system and have some inherent challenges from an implementation perspective. The cost of a lack of industry confidence in assessment outcomes is seen to outweigh these challenges and should not diminish any resolve from government to pursuing industry agreed measures to improving the quality of assessment.

Structural changes in the assessment process and regulatory arrangements surrounding the governance of RTOs are seen as fundamental foundations to manifestly improving industry confidence in assessment outcomes.

In the face of a rapidly changing operating environment, an assessment reform agenda is required to ensure a return on investment in Australia's VET sector is maximised to the benefit of industry, communities, government and individuals.

If you have any further queries regarding the above matters, please contact Anna Thomas, Policy Advisor RITC on (08) 9220 8530 or a.thomas@cmewa.com

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**Authorised by**  
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10 March 2016  
Signed

**Document reference**  
160310-PS-RITC-Quality of Assessment SubmissionV0.5.1