



CHAMBER OF COMMERCE AND INDUSTRY QUEENSLAND SUBMISSION

▼ *DISCUSSION PAPER*

Quality of assessment in vocational education and training

Department of Education and Training

March 2016

CCIQ Position

1. As Queensland's peak business body, the Chamber of Commerce and Industry Queensland (CCIQ) welcomes the opportunity to provide a submission to the Department of Education and Training on the 'Quality of assessment in vocational education and training' discussion paper.
2. The vocational education and training (VET) system is essential to a healthy, productive and diverse economy through the skilling and upskilling of Queenslanders. VET is also often considered a gateway to employment for those who are long-term unemployed, early school leavers, and of low literacy or numeracy skills.
3. The discussion paper has been closely examined by CCIQ's Workforce Skills & Productivity Committee members, some of the industry's most influential and passionate players in the space of workforce development. Since 2014, these experts have dedicated their time to tackle the major challenges in delivering effective workforce skills for the benefit of small and medium sized businesses.
4. The Committee through ongoing consultation and collaboration identify key initiatives and develop policy positions that relate to workforce matters. CCIQ relies on the Committee to provide leadership, policy direction and industry intelligence to the key matters that are identified. Through CCIQ, the Committee have provided a response to the questions of the discussion paper as follows:

Question 1: RTO Limitations

5. The Training and Education (TAE) training packages should be delivered by a person who has sufficiently demonstrated experience in VET sector by the number of years and qualifications. As with most other industries, a level of skill or experience is a prerequisite for such leadership and teaching roles and it should not differ for the VET sector.
6. This approach should automatically determine the number of Registered Training Organisations (RTOs) as each RTO will need to meet a certain level of quality assurance. Government's task in reducing the numbers would be made simple by deregistering RTOs that do not meet the high-quality provisions.
7. Through experience, it has been seen that top quality trainers with industry credibility will drive the standard of the assessment to match their high training standards. Consultation and collaboration with such trainers would be key to understanding the appropriate level of quality assurance.

Question 2: Skills and qualifications of trainers and assessors

8. A number of recommendations can be put forth on how to improve assessment such as through practical application as well as learning how to map an assessment to a unit of competence. However, making the assessment a policing activity assumes that there was poor quality

teaching and assessors are supposed to regulate this to a greater degree. Instead, a better quality VET system will come from better teaching not just from better assessment.

9. Furthermore, greater attention needs to be directed towards funding contract mismanagement as much as the focus is also on the performance of VET assessors. The case of the hugely expensive VET FEE-HELP demonstrates how funding contract mismanagement has been the source of many of the issues within the VET system that are occurring today.

Question 3: Benefits and purpose of a VET professional association

10. It is to be recognised by the Department that there currently exists a national VET association – the Australian Council for Private Education and Training (ACPET). ACPET provides effective and targeted advocacy on behalf of its private education and training members in the areas of VET, international education and higher education among its other services. Their core purpose is to *“enhance and promote the capability of its members to achieve the highest quality education outcomes”*.
11. The membership based model of ACPET does not make it mandatory to join and such arrangements should be maintained. This approach allows for ACPET to be a true voice for education and training members through the transparency afforded by its membership list.

Question 4: Potential activities of a VET professional association

12. Further to the response in question 3 above, ACPET currently undertakes all the recommended activities proposed in the discussion paper:
 - a. coordinate, approve or design professional development programs
 - b. develop capability frameworks
 - c. positively promote the profession of VET trainers and assessors as an employment destination and career path to attract professionals
 - d. act as an advocate and voice for VET trainers and assessors
 - e. interact with industry to respond to their emerging needs
 - f. register VET practitioners
13. CCIQ fully supports the recognition of ACPET as the organisation to fulfil the role, particularly given their involvement, prominence and substantial influence at a national level.

Question 5: Models for a VET professional association

14. CCIQ strongly opposes a VET teacher and trainer mandatory membership with a professional association. The industry is already hindered by too many contractors and it may be extremely difficult to efficiently and successfully manage.
15. As mentioned in the response to question three, the current voluntary model allows for the national professional association to be a true voice for its members by the transparency afforded

by its membership list. This also places accountability on the association to represent the industry's best interests.

Question 7: Increasing industry confidence and Question 8: The role of industry in assessment

16. Industry engagement is difficult as the synergies between industry itself and those in the VET system are lacking. Partly due to the low understanding by industry of terminologies used in VET, the level of engagement between VET providers and their employers requires strengthening.
17. Industry is also optimistic that the State Government's 'Jobs Queensland', an independent body providing industry advice to the government pm skills demand and long-term workforce needs, will greatly assist in bridging the gap and increasing industry confidence. This will in turn improve the value that industry places upon such qualifications.

Question 9: Specific models

18. CCIQ strongly advocates that training and assessment should not be individually analysed and separated as they fundamentally go hand in hand. Having external assessment by industry will complicate an already over-complicated sector with very little benefit. A holistic approach is required and would be considered a more favourable approach by industry and VET providers.

Question 10: Industry expectations and graduate capabilities

19. It was suggested that the model currently being used in New Zealand is ideal for adoption in Australia. Vocational education in New Zealand, though application oriented is assessed with great precision by their 39 RTOs. Furthermore, with the enactment of their Industry Training Act, the role of the industry has become a key factor in shaping VET education in New Zealand.
20. All courses are subjected to rules governed by an Accreditation and Moderation Action Plan. Through such monitoring, assessments meet standards as required by the industry and conform to a consistent level of competency. The moderated assessments allow students perform as per expectations of the industry.

Question 11: Evidence of assessment and graduate competency

21. The best assessment outcomes will come through delivering practical application in a real industry environment. Focus on the outcomes rather than on the assessment itself will deliver the much needed results for both businesses and the graduates themselves.

Question 12: Enforcement

22. It was suggested that the regulatory enforcement approach could potentially be to allow an RTO “three strikes” within a given period before registration is revoked.

Question 13: Cancellation and reassessment

23. In the event where inadequate assessment has occurred, the qualification should be cancelled only in high risk qualifications and a re-assessment should be offered and funded through a tuition assurance model. The RTO could apply to be re-assessed at a fee with the student being able to choose who they want to go through.
24. However the current re-assessment process must be streamlined as at present, the red tape makes it easier to start right from the beginning as opposed to a simple re-assessment.

Further enquiries

25. We thank the Department for the opportunity to provide comment and welcome any feedback. Please contact Catherine Pham, Policy Advisor, at cpham@cciq.com.au for matters relating to this submission.