

Begin with the end: RTO practices and views on independent validation of assessment

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Additional information relating to this research is available in *Support document 1: Models for independent validation and moderation of assessment – an annotated timeline 2001-2020* and *Support document 2: International approaches to employer engagement in quality vocational education and training*. They can be accessed from NCVER's Portal <<http://www.ncver.edu.au>>.

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About the research

Begin with the end: RTO practices and views on independent validation of assessment by Francesca Beddie, Francesca M Beddie & Associates

RTO staff can see the value of independent validation of assessment as part of a training system striving for quality. Those interviewed in this project would welcome reforms that foster excellence and professionalism. Such change would not, however, require abandoning the current systems. What is favoured is bringing assessment and certification to the fore of training package development, implementation and adjustment, with less onerous validation processes helping to inform improvements.

This report seeks to deepen understanding of the persistent issues registered training organisations (RTOs) encounter when conducting independent moderation and validation of assessments, and of the nature of industry involvement in these processes. The report achieves this by drawing on the findings from semi-structured interviews with public, private and community RTOs in urban and regional settings.

The research is accompanied by two support documents:

- a literature review containing an annotated timeline, spanning 2001 to 2020
- a desktop investigation of validation and moderation approaches in the United Kingdom, Europe and New Zealand.

The interviews reveal that independent moderation and validation entail consideration of the diverse clients and business models of the various types of providers, and that a one-size-fits-all approach is not a workable solution. A desire for more professional development and greater opportunities to share experience in the field of assessment, moderation and validation was frequently expressed.

Key messages

- Independent validation of assessment is driven by regulatory requirements, which can generate a compliance mentality, leading to over-assessment, but not necessarily better assessment practices or improved training.
- Validation can play a constructive role in RTO governance and continuous improvement, although the associated terminology is not universally understood or used consistently, and the reporting burden is considered onerous.
- Compliance and good business practice drive ongoing relationships between RTOs and employers. Integrating validation into these relationships is viewed as potentially more constructive than any formal validation role for employers, especially since many, particularly those in small-to-medium enterprises (SMEs), see validation as the responsibility of the RTO.
- Validation has the potential to bridge the gap between training package requirements and industry realities, given the latter often evolves more quickly than the training package.
- Where moderation does occur, it is primarily used to benchmark assessments across an organisation rather than as a measure of consistency with other organisation's assessment results.

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Contents



About the research	3
Acknowledgments	4
Executive summary	6
Validation of assessment: RTO practice	10
Definitions	11
How it happens	13
Identifying risk	13
Engaging employers	14
Creating assessment tools	15
Validating the tools	16
Validating the outcome	17
Issues facing the sector	23
Not a uniform sector	23
The feedback loop from assessors to training package developers	24
COVID-19	25
Validation as continuous improvement	26
The role of the regulator	26
Professional development	26
Changing things: begin with the end	28
Who validates what?	29
Moving from compliance to trust	31
References	32
Appendix A	33
Discussion starter	33



Executive summary

Getting assessment right is not easy, but it is important. The quality of assessment in vocational education and training (VET) has implications for the credibility of VET qualifications and the competence of the graduates who hold these qualifications. Validation of assessment tools, processes and outcomes is therefore an important element of quality assurance, albeit not one that is universally understood in the same way or practised in a consistent manner. This research was undertaken in order to better understand how registered training organisations (RTOs) conduct independent moderation and validation of assessment (IVA), as well as industry's involvement in these processes.

The Australian Skills Quality Agency (ASQA; 2020a) website explains these two terms:

Validation is the quality review of the assessment process and is generally conducted *after* assessment is complete. Validation involves checking that your assessment tools have produced valid, reliable, sufficient, current and authentic evidence, enabling your RTO to make reasonable judgements about whether training package (or VET accredited course) requirements have been met.

...

Moderation is a quality control process aimed at bringing assessment judgements into alignment. Moderation is generally conducted *before* the finalisation of student results as it ensures the same decisions are applied to all assessment results within the same unit of competency.

A timeline setting out the policy approaches and refinements to independent validation and moderation of assessment over the last twenty years, as well as reviews and the results of pilots (see support document 1), reveals recurring issues, ones also confronting VET systems in Europe and New Zealand (see support document 2). These are:

- the desirability of a change in the culture of compliance into one of continuous improvement
- greater clarity about what should be independently validated: assessment of tasks in units of competency, qualifications, occupational competency or work-readiness
- the requirement to define 'independent', given that the work of validation requires experts who understand the industry, as well as training and assessment processes
- the need to incorporate validation of assessment tools and outcomes into the cycle of training package implementation and to ensure that the language used in the system is clear to trainers, learners, employers and auditors
- more emphasis on the continuous professional development of trainers, and particularly assessors, as part of quality assurance
- a lack of unanimity about the extent to which industry should become involved in moderation and validation
- tensions between reconciling national standards with local contexts, and juggling individual employers' judgment of competency with broader industry requirements
- frequent reviews and changes to policy settings in the national training system.

The loudest message to emerge from the interviews with a range of RTOs was that independent validation (the 2015 RTO Standards¹ do not mention moderation) of assessment is driven by regulatory requirements. This compliance mentality can lead to over-assessment, for example, the repeated assessment of elements common to more than one unit of competency, but not necessarily better assessment practices or improved training.

That said, RTO managers do acknowledge the role of validation in good governance and continuous improvement. This aspect would be much enhanced if less paperwork were involved: the evidence-collecting and reporting burden is onerous. Where moderation does take place, it is used to benchmark assessments across an organisation (and much less externally) and rarely in response to a student querying a result. Interpretation of these terms, including the variants ‘pre- and post-validation’, is idiosyncratic.

RTOs do fully understand the importance of industry engagement to help them produce competent graduates. In terms of validation, engagement with industry partners is more usually incorporated into ongoing business relationships and encounters. This may in fact be more constructive than formal validation arrangements, given a common perception among those interviewed that most employers, especially SMEs, have neither the time for, nor an interest in, validation, because training and assessment are seen as the responsibility of the RTO.

Understanding of training package requirements is not uniform. Not all trainers and assessors know what is mandated and get lost in the voluminous documentation. Others rely on experts within their organisations to interpret what they must do. Internal rules are often determined with an eye on the auditor not the trainer or student. The result can be impractical assessment and validation rules. The pendulum appears to be swinging, again, towards receiving more guidance on assessment, with some arguing for centrally produced and regulated assessment tools. This could signal a move away from a system that sets out to RTOs what is required of a competent student but not how to train and assess.

*

At this time of flux in the policy and funding environment, this research is intended to enhance understanding of the persistent problems in current practice. The interviews raised, *inter alia*, the following questions, although these were not always viewed from the same standpoint. Indeed, the interviews, which ranged across public, private and community RTOs operating in urban and regional settings around the country, strongly suggest that finding workable solutions to independent moderation and validation will entail consideration of the business models and clientele of different types of training providers. As so often in VET, a one-size-fits-all approach is unlikely to achieve the goal of having nationwide credible assessment and certification practices.

Does validation of assessment aim to ensure competence and industry relevance or compliance with RTO Standards?

The compliance mentality can lead to a separate assessment of the skills and knowledge set out in a unit of competency. This obviates against the cumulative experience of learning that results in competent application of skills and knowledge in the workplace. There is a widespread sense that professional judgment is no longer sufficiently valued as part of the assessment process.

1 <<https://www.legislation.gov.au/Series/F2014L01377>>.

The language of trainers and standards is not that of the workplace. This gives rise to ambiguity and a sense of unrealistic expectations. It also poses the question of the degree to which validators can be independent of the training, given they need still to understand the fundamentals of training, assessment and industry realities. Further, workplace conditions and industry requirements evolve more quickly than the training packages, sometimes making, from the RTO's point of view, compliance difficult, if not impossible.

Is there an adequate feedback loop?

Industry is involved in the formulation of occupational standards but is out of the loop at the training package review stage. Validation should try to bridge that gap. This might be achieved by having assessment appear more prominently in the training packages and incorporating audit findings into the training package processes, with quality assurance involving experts in assessment and industry. This might lead to better articulation of what a graduate can do and how an employer assesses work-readiness, as well as draw attention to the obstacles trainers face in tailoring their programs and assessment practices. For example, some qualifications are wide-ranging (construction) or generic (business), and the rules are not seen to accommodate local contexts and student cohorts in all instances.

In the United Kingdom, a new system of end-point assessment for apprenticeships involves an employer-set assessment plan, introduced to add clarity about what is expected of assessment tasks. A quality assurance, or validation, exercise examined 50 end-point assessments in the first wave of this reform. That exercise showed a considerable amount of what was required for valid assessment had been identified upfront by employers in the assessment plan. The exercise also identified flaws in assessment processes, such as inconsistencies between assessments and the plan, missing elements in assessment tools and poorly explained assessment tasks (see support document 2, p.11). These findings point both to the advantages of employer involvement in shaping assessment and verification processes to improve the process of assessment.

Can new technologies help?

Lack of access to actual or simulated workplaces is a problem. Virtual reality (VR) teaching environments can help but these require investment. Online learning and the use of cameras and recording devices etc. can assist in assessment and its validation, as can greater clarity – but also flexibility – in what are acceptable forms of assessment and validation.

Digital communication via platforms such as Zoom is making industry consultation easier and should help reduce duplication of evidence collection. With the move to this kind of industry engagement and by using the recording functions of the technology, it may be possible for RTOs to more easily gather evidence for assessment and its validation. Some providers are wary of these technologies; some think the training package rules or auditor will not accept them as substitutes. With the rapid shift to digital solutions necessitated by COVID-19, it would be timely to issue (and possibly revise) guidelines on the place of technology in assessment and validation.

How can professional development be better supported?

The interviews revealed an appetite for more opportunities to share experience in the field of assessment, moderation and validation. This could perhaps be facilitated by peak bodies in annual validation/quality assurance summits. In many interviews, the desire for more professional development was emphasised, with some individuals suggesting a specialisation in assessment at diploma level was needed. Those involved in digital solutions indicated that their uptake would not be widespread unless accompanied by a concerted effort to upskill trainers. More centralised assessment resources, or at least benchmarks, might create greater certainty about what is expected of a competent, work-ready graduate.

*

Validation is part of RTO practice and has a valuable place in the system: it makes good business sense to check with stakeholders that the training product is working. Formally, it often operates on a risk-based approach (high-volume, higher-risk qualifications) or is triggered by the release of an updated training package. Validation systems vary significantly depending on the size of the RTO and its connection to the community. These systems are constructed primarily to comply with regulatory standards. Documenting the validation of assessment tools and the outcomes of knowledge assessments is more straightforward than recording evidence of practical assessments either in the workplace or in simulated work environments. This is a particular challenge for most, as is formally involving employers in the validation of training outcomes. The lack of systematic external validation across the sector means that it remains difficult for employers to judge whether the qualifications issued by different RTOs are of equivalent quality.

There is a mood for a change that values excellence and professionalism while preserving the national system of defining occupational standards. At the RTO level, this could mean, in addition to deeming graduates competent, issuing awards or badges to signal a student's achievement beyond the benchmark (and as a form of advertising an RTO's expertise) – validation in the sense of affirmation or recognition of excellence – accompanied by an increase in external arrangements to certify qualifications. In some industries, it will see the continuation of licensing arrangements or the introduction of external examinations or capstone projects. It might even lead to the responsibility for verification of assessment/graduate outcomes to be assumed by an independent person (a master assessor) or body.

COVID-19 has demonstrated that the sector can be nimble and innovative. Embedding these qualities into assessment and its validation needs support for upskilling and professional practice. All this has implications for the architecture of the system and funding regimes and would represent a significant cultural shift that would entail investment and careful management.



Validation of assessment: RTO practice

Validating assessment is a much researched, reviewed and piloted topic. Yet, it remains difficult to do well and consistently across the national system and is not universally thought of in the same way. It was therefore decided that this project should focus on current RTO practice to enhance understanding of the issue at the operational level. The first stage of the project involved a literature review, presented as an annotated timeline of Australian policy initiatives, reviews and research, from 2001 to 2020; and a desktop investigation of validation and moderation approaches in the United Kingdom, Europe and New Zealand. The issues identified in this first stage informed the second stage of semi-structured interviews conducted with a selection of public, private and community RTOs around the country, as well as others

involved in the national training system.² The purpose of the interviews was to identify how validation and moderation were occurring, the role external bodies, in particular employers, had in these processes, the level of satisfaction with the system, and the obstacles to ensuring a nationally consistent approach.

Discussions with RTO managers and trainers were all framed by the standards for RTOs, although they revealed very different experiences, depending on their organisation's size, the variety of qualifications on scope, their clientele and the student cohort. This diversity reinforces the complications in striving for national consistency in a sector of over 4000 providers and four million students, engaged in training ranging from several years of full-time study to a single unit of competency. What was consistent was the enthusiasm for the topic among all who were interviewed, their commitment to doing their best and the huge workload that their regulatory obligations entail.

Synthesising these conversations takes us back to Braithwaite's 2018 review of the *National Vocational Education and Training Regulator Act 2011* report, where she observed: 'Part of the difficulty of ensuring the quality of assessment is that it is regulated through a "trust chain"' (p.72).

The tenor of this project's conversations echoed the Braithwaite review, with consensus that assessment needs to be at arm's length to remain impartial and rigorous, but still linked to work contexts and best underpinned by collaboration and communication about what work readiness means, along with trust in the professionalism of teachers, boosted by continuing professional development.

Key points

- Trust – not just compliance – is needed to drive quality.
- Different understandings of what validation of assessment is and what it entails is an obstacle to national consistency.
- The distinction between validation of assessment, and summative or end-point assessment can get blurred, reflecting how these processes may become intertwined in current practice.

2 TAFE managers and trainers (in four states/territories); two community colleges (NSW); four private providers (QLD, NSW, WA); one peak body (TDA); two government departments (Australian, Vic.); one World Skills Australia; one commercial provider (products); one skills service organisation; one skills organisation; one software developer and provider.

Definitions

Inadequate understanding of the terminology used in the regulation is a significant impediment to improving assessment (namely summative assessment of competency not formative assessment of and for learning). Poor understanding of the terms, 'validation', 'moderation' and 'independent' was a persistent theme identified in the literature review. During the interviews, people used these terms in different ways.

This definitional problem is not confined to the Australian system. A discussion (Barabasch 2016, p.653) of quality management in European competency education pointed out:

Sometimes the terms 'learning outcome' and 'competence' are used interchangeably ... Learning outcomes are validated by their relationship with competencies [they] do not directly refer to practices in the real world.

This points to a further complication in understanding and expectations. The language of trainers and standards (such as training packages in the Australian system) uses a great deal of jargon that is not easily understood in the workplace. Further, employers may develop unrealistic expectations of vocational competence and job-readiness, which for a new graduate is not mastery.

Confidence in the system is compromised when a 'false-positive' assessment (that is, deeming someone competent who is not) is made. Hence the need for moderation and validation. The Australian Skills Quality Agency (ASQA 2020a) explains these two terms, which appear in the Standards for Registered Training Organisations (RTOs):

Moderation is a quality control process aimed at bringing assessment judgements into alignment. Moderation is generally conducted *before* the finalisation of student results as it ensures the same decisions are applied to all assessment results within the same unit of competency.

Validation is the quality review of the assessment process and is generally conducted *after* assessment is complete. Validation involves checking that your assessment tools have produced valid, reliable, sufficient, current and authentic evidence, enabling your RTO to make reasonable judgements about whether training package (or VET accredited course) requirements have been met.

Thus, moderation is associated with quality control and validation with quality review.

Clause 1.25 of the standards requires that 'the RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes'. What constitutes independent has also been a matter of some confusion. The current ASQA website (June 2021) explains, in bold, that: 'Validation must be carried out by someone who has had no involvement with the RTO other than conducting the validation activity'. This is not necessarily an employer or industry representative; it could be another training provider or specialist assessor. The standards are only explicit about independent validation when it comes to the Training and Education (TAE) Training Package:

If you wish to add a TAE qualification or assessor skill set, you must provide ASQA with evidence that your RTO has undergone an independent validation of:

- five qualifications on its scope of registration other than the TAE or TAE10 Training Packages or, if you have fewer than five qualifications on scope, all training products on your RTO's explicit scope of registration
- the assessment system to be adopted in the delivery of the qualification/s or the assessor skill set/s applied for.

Nevertheless, the current policy directions emphasise industry involvement in the system. The draft VET roadmap compiled by the Skills Senior Officials' Network envisages that a new system for assessment will be endorsed and invested in by industry, with various models devised and their application to be trialled across a range of industries and modes of study (Skills Senior Officials' Network 2020, p.6). The roadmap foreshadows trials of alternative assessment models, whose aim would be that: 'industry can readily identify the best providers and have confidence in graduate skills and knowledge' (Skills Senior Officials' Network 2020, p.3).

Further, while those delivering the TAE know the RTO Standards very precisely, other trainers in large TAFE (technical and further education) institutes, who might be remote from their quality and compliance units but worried about having to tick the right boxes, gave the impression they interpreted independent validation meant involving a person external to the organisation – ideally from industry – something they found a real challenge.

As interviewees described their processes, starting from the introduction of an assessment tool or process, many spoke about 'pre-validation', that is testing new assessment tools to see if these were reliable before they were put to use. Some understood this to be the same as moderation, although few talked about establishing external benchmarks for assessing students. One person insisted that validation needed data and therefore was, by definition, post-assessment. This accords with the ASQA guidance:

Validation includes reviewing a statistically valid sample of the assessments and making recommendations for future improvements to the assessment tool, process and/or outcomes and acting upon such recommendations.

As well as having different sequences to validation, another nuance in the definitions involves what is being validated: a) the RTO's assessment systems; or b) the system's ability to produce job-ready graduates and to align training with what is realistic in the workplace.

The question was raised about how independent validation could be. While employer involvement could be especially valuable in aligning training to workplace practices, the 'independent' person did need to understand the whole process of training and assessment, the subject matter and the industry context to make a sound judgment. Similarly, validating assessment resources required not only impartiality but also an understanding of pedagogy.

Moderation is not mentioned in the latest RTO Standards, which goes some way to explaining why people had less to say about it. When it was discussed, the term was not always used to mean ensuring 'the same decisions are applied to all assessment results'. One person described a moderation process as confirmation by a lead assessor with other assessors that the group was comfortable to start using the assessment tool – more akin to pre-validation? Another suggested that, given the rolling nature of the VET assessment, it was not possible to moderate results before a qualification was issued, while it was possible to use validation to improve the process.

How it happens

One of the gaps in understanding validation of assessment is how RTOs actually approach the task. It was this gap that prompted this project, the aim of which was to build a picture of current practice. The following describes the processes, which do vary, with large TAFE institutes having much more elaborate systems than smaller providers for gathering and documenting evidence, conducting and validating workplace assessment, and integrating improvements in training practice, assessment tools and processes.

Key points

- Approaches to validation of assessment vary depending on provider type, on qualifications, with high-volume and high-risk ones more frequently validated.
- Employer engagement is important to RTOs. This does occur as part of validation: sometimes formally; sometimes as a less well-documented element of interaction.

Identifying risk

Clause 1.10 of the Standards for RTOs 2015 states:

each training product is validated at least once every five years, with at least 50 per cent of products validated within the first three years of each five-year cycle, taking into account the relative risks of all of the training products on the RTO's scope of registration, including those risks identified by the VET regulator.

This requirement – as well as good business sense – determines an RTO's validation cycle. The most cited risks driving the timetable are high-risk qualifications and qualifications with high volumes of students. The other common prompt for a validation exercise is the introduction of a new or amended training package. RTOs have workflows built into their systems that include timelines for validation, with many striving to automate these to reduce the amount of paperwork required.

Q: How do you decide your timetable for validation? A: Volume. So that means the conservation and management quals are on the back burner after a major riot at the juvenile detention centre where they were being delivered. (Small community provider)

The new TP has streamlined the unit guides and addressed ambiguities, which had meant that how an assessor had interpreted things in the past was open to dispute, including by validators, auditors. (TAFE institute)

[We take a] risk approach to determine the schedule of validation [which is] based on student completion data. According to risk, assessments are validated more frequently and qualifications that are higher risk are early in the five-year schedule. Very high-risk ones (30 or 40 quals) are validated each semester, high risk once a year. This is worked out centrally, based on data and assessed by algorithm. The education risk profile has 15 factors including: volume enrolments, completion, licensing requirements. For example, the Cert. II in Electrotechnology is high risk as is the Diploma of Nursing and childcare qualifications. (TAFE institute)

In this last example, the validation covers tools as well as outcomes, with action on issues being directed either to the team responsible for developing assessment resources or to a local compliance team that can address teaching practice.

Engaging employers

A focus of this project was on whether and how RTOs involved employers in validating their assessment tools, processes and outcomes. Discussion in the interviews often strayed from validation *per se* to employer engagement overall, which is explained by two factors: compliance and good business practice. First, the RTO Standards (clauses 1.5 and 1.6) require RTOs to engage with industry. They must demonstrate that industry representatives have, *inter alia*, had input into the resources the RTO uses for training and assessment. The interviews suggested that, in practice, this requirement can merge with that of independent validation of assessment (clause 1.25 of the Standards). Second, all the RTOs who responded to the invitation to participate in the project demonstrated a strong commitment to delivering training that met their clients' (both students and employers) needs.

For those interviewed, engagement with employers takes place constantly – in formal meetings with industry reference groups or via annual industry updates, but also in the normal course of business. People in industry are also trainers or former students, as well as employers buying training or looking for graduates. TAFE managers did observe that engagement varied, depending on qualification and mode of delivery, with some areas having much stronger links, especially those who train apprentices or work with companies that make equipment available (for example, in mining) or when clinical placements occur (as in nursing) or if the employer (for instance, corrective services) has a large contract with the provider and could therefore specify quality control. Nevertheless, as one person put it:

'[Employers are] happy to say what they want and need, but not to get deeply involved in compliance'.

One private provider explained:

Industry looks to RTOs to guide them through the maze. Good trainers are in touch with clients all the time. For example, I'm doing this interview in a client's office.

While some of this industry engagement is captured as evidence, for example, because it is recorded on a form or is explicitly part of the RTO's validation process, a lot may not form part of the formal validation paper trail.

The college has a weekly toolbox meeting with industry consultation on the agenda. This minutes who has had a conversation with industry and the main points. We are also represented on external committees (e.g. the council), which is another resource of 'industry' community intelligence, for example, it uncovers what needs disadvantaged communities have in terms of training.

(Community provider)

We invite employers onto a validation panel but in the lead-up other interaction is recorded about consultation on assessment and the TAS [training and assessment strategy]. (Private provider)

Engagement has got better and easier as our reputation has built and with students now in the industry. We don't want to overburden industry, so we chose people we know will be interested.

(Private provider)

We have a new first aid trainer who is also a paramedic. He has observed that some things being taught are no longer practised in the industry.

(Community provider)

It would be misleading not to add a caveat here. Overall, it does seem difficult to get direct engagement of industry in the development of assessment tools, usually devised by a subject matter expert and experts in assessment and training packages, or as independent validators. How some RTOs do involve industry representatives in validation is discussed below, following the section describing what the interviews revealed about creating assessment tools.

Creating assessment tools

In large organisations where writing the assessment tools is a central responsibility, those using the tools at the coalface commented that they were suitable for compliance but needed contextual adjustment to satisfy the learner cohort, the mode of delivery or industry context.

Smaller organisations with several qualifications on scope (the community providers consulted for this project) bought in assessment tools from commercial providers such as Smallprint.

The Smallprint website³ explains that its:

assessment resources are developed by qualified workplace assessors and trainers, with industry and VET experience who understand training packages, ASQA standards, rules of evidence and principles of assessment.

And clearly states: 'No commercial provider can guarantee that their assessment resources will pass audit'.

One person observed that these third parties were not subject to regulation in the same way RTOs were. This had implications for the quality of assessment.

The providers interviewed for this project did adapt the tools to suit their learners and their industry needs. One TAFE expert said these third-party materials might be a good start for smaller RTOs, given developing tools from scratch is a huge process, but stressed these still needed to be contextualised. This points to the importance of validating how these tools perform.

The CEO of a private provider, who has dedicated staff to write the RTO's materials and who draws on the organisation's strong linkages with the health industry (the only industry it works with), made this recommendation several times during the interview:

To achieve consistency, we need to benchmark assessment of each unit and have this published on training.gov.au along with unit guides and companion manuals. These must not be buried. And make sure that the benchmark is not too loose – too many RTOs are having to guess what is required.

The materials his staff create aim to make sure that all his trainers across three states have enough guidance to deliver consistent outcomes and to meet the benchmark. When it emerges from validation exercises that trainers need to improve their assessments, they receive extra support to bring them up to standard.

In more centralised, large RTOs, assessment and its validation are the responsibility of compliance units or specialised industry hubs, with dedicated staff writing assessment tools. One interviewee explained that his institution was striving to ensure that the compliance process was linked to educational quality and enhanced the assessment. This is the same across several of the TAFE institutes consulted, all of which are committed to increasing expertise in assessment and validation and are responding to staff demand for professional development in these areas.

Nevertheless, major audits have revealed widespread ignorance of what was required to conduct compliant assessments. While acknowledging that this has prompted improvements, for some, management's response to these audits resulted in unrealistic expectations of those delivering the qualifications.

³ Smallprint website: <<https://smallprint.com.au/services/support-for-rtos>>.

Assessment tools are written centrally, which means they are not attuned to the specifics of the delivery. Some of the requirements are undeliverable. This has come about because of a culture of (over) compliance, and even misinterpretation of the regulator's feedback.

(Community service trainer at a TAFE institute)

The system had become too onerous – with 30 units of competence in the qualification, the requirement to gather evidence for assessment of every unit meant some skills were over assessed because they were included across the qualification. Students were being over assessed and under trained ... The validation timeframes [were] too tight for QA and incorporating feedback.

(Construction training manager at TAFE)

Several people were critical of the excessive requirements for assessment and the associated validation, especially that these did not recognise the difficulties of doing assessment in the workplace or gathering evidence of practical assessments. As one TAFE manager observed, 'students were being over-assessed and undertrained'.

One example given was that in some cases employers would not allow unqualified people to undertake the tasks (such as dealing with alcohol-affected clients; doing meat inspections). As the respondent from one private provider commented:

They want validation of every single little thing. Assessment tools go from six to 45 pages. Most of our time is now taken up gathering evidence. The process of validation is a process of evidence collection in ways that help auditors – things must be black and white. They require the answer that exactly matches the marking guide. In my mind that's plagiarism. Twenty-five per cent of the business's activity is writing evidence. We have had to add three to four people for compliance.

The concern to have the correct paperwork for an auditor was widespread, with some, like the private provider quoted above, suggesting that this could lead to using assessment tools (for example, online multiple-choice quizzes) that lent themselves more easily to being checked by an auditor than to ensuring competence.

Validating the tools

All of those interviewed validated the assessment tools they were using. The purpose of this exercise was to determine whether the tools were assessing the right thing; whether students were understanding what they were learning and the assessment questions; whether the tools were capturing all of the knowledge and skills required to be competent; and what gaps in training or flaws in the assessment tools should be addressed.

At one TAFE institute, in which separate colleges write their own assessment resources, the tools are 'pre-validated' before they are put into practice:

This entails industry partners running their eye over the tool to say 'yes, that is a good project for assessment', or they suggest things beyond the TP standards, make suggestions about extra things that are done at their workplace or how equipment might differ.

For all types of providers, this industry engagement can reveal shortcomings in the training package requirements or at the RTO. The provider may, for example, have obsolete equipment or no access to the equipment prescribed.

This is the hardest challenge because there is no budget for high-end equipment and we have to balance between big and small employers. This means there can be too much prescription in the training package assessment requirements. So, we have to change electives. (TAFE institute)

In bakery, new requirements for what equipment is required are overwhelming. [It becomes] impossible to teach because of the resource requirements. For example, teaching hospitality in the prison cannot be an accredited course because it's too complicated for simple coffee and sandwiches. [That's] counter-productive because prisoners don't get a piece of paper to help them find a job.
(Private provider)

When an industry representative is involved in 'pre-validation', finding the balance between what various employers expect of graduates and incorporating this into the assessment tools and judgments about competence can require negotiation. In one TAFE college offering commercial cookery, an assessment task, for example, preparing breakfast dishes, is emailed to a range of employers for their approval. The way each employer offers a dish in their establishment may vary but they can see that the student is learning the fundamentals. This email correspondence constitutes evidence of industry engagement, as well as being part of the validation process, with feedback used to tweak the assessment tools and, in some instances, also content.

Validating the outcome

Validation of assessment also aims to ensure that students have been correctly deemed competent. This is not straightforward in a system that imparts both knowledge and skills in order to train people for a job. The following quotation from a trainer of trainers illustrates this combination:

Evidence is captured over the duration of learning to ensure that units of competency combine into a qualified [TAE] graduate, someone who doesn't just understand learning styles, but having learned about styles then considers these in lesson plans and assessment activities. (Private provider)

The interviews revealed differing views on the role of professional judgment in assessment. While most argued that judgment was a vital ingredient, for some (primarily in technical or clinical fields), it was considered possible to have prescriptive, step-by-step marking and assessment guides to check whether someone had, for example, built a table to the right specifications within the specified timeframe. Differences also emerged when describing the process of workplace (or simulated workplace) assessment and how this can be validated.

Overall, it emerged that in VET judging competence requires holistic assessment of the application of knowledge and skills. So, while validating knowledge tests is increasingly easier because of automated marking systems, validating observations of the combined use of technical and soft skills in context has challenges and does rely on judgment.

We are now co-assessing, that is looking at the application of knowledge and the demonstration of skill, and the use of soft skills within host units. (TAFE institute, construction)

The discussions also revealed differences in approach, depending on the purpose of the assessment – as an integral part of the training process or as an end point. Generally, it was in the latter that the role of the employer was identified as important in determining what should be assessed to deem someone work-ready and how well that work was being performed. The interviews focused on summative assessment and certification.

Validating judgments about workplace competency

The RTO working in health has the advantage of having nurses on staff. These nurses watch the trainers deliver while the students learn in the workplace. This acts as both a moderation of trainers' judgment, as well as validation of the tools and assessment process.

For most, however, when it comes to assessment of competence in the workplace, providers do rely on employers. In apprenticeships, in particular the licensed trades, this is easier because the employer must complete paperwork, for example, a digital record to confirm the student has completed specified jobs.

It was not evident that all those who spoke about the problems of including employers in validation had the precise ASQA requirements and advice at the forefront of their minds. This advice does allow taking a team approach to meeting the requirement that those involved in validation have the following skills and attributes:

- appropriate vocational competencies
- current industry skills and knowledge
- an appropriate training and assessment qualification or assessor skill set
- current knowledge and skills in vocational teaching and learning (ASQA 2020b).

This means the role of the employer might be more limited than some believe is necessary.

In other instances, workplace competence is assessed in a simulated environment, for example, in a provider's own training kitchens or workshops, or in role plays, using actors (for better resourced providers), or trainers (which can incur additional costs for extra hours), or students. This approach makes it easier to record the assessment process as evidence for any future validation exercise. More difficult is capturing evidence of the practical application of skills and knowledge for generic qualifications such as business, accounting or logistics, which are delivered without a practical placement.

Digital technology is helping to record evidence when it is impractical for the assessor to observe performance in the workplace. For example, a TAFE teacher working in community services explained that:

Employers are reluctant to have video in the workplace, though some are changing. For example, in aged care, a student who has no supervising boss in the workplace is using Facetime during a home visit.

When discussing the possibilities offered by new technologies, several people mentioned the wider benefits to training and assessment, as well as to validation. Some saw potential for greater use of virtual reality, for example, for developing skills required in big infrastructure – tunnelling – not available during training and for screening students⁴ so they get to know the practical challenges of the job – the anxiety of diffusing a bomb. To realise this potential would require systemic investment in hardware, software and skills. While the focus here would primarily be on the development of competence, it was suggested that being able to observe and record the student's behaviour in virtual reality would make validation of outcomes easier, especially when VR was embedded in the learning management system.

A private provider who does use VR, especially in VET in Schools programs, observed that hardware had become very expensive, saying, 'there's an arms race in this area'. Delivering VR to schools is easier because the simulations can be seen on networked desktops, thus reducing the cost. He also cited the benefit VR can offer students in remote communities, who do not have access to simulated workplaces (in this case, hospitals). They get exposure to the real thing. Even with these benefits, this trainer

4 A point made by Halliday-Wynes and Misko (2013) when discussing assessment issues in childcare and aged care.

concluded it was better to have actual workplace learning and assessment used in the more advanced qualifications. He considered it would be a long time before VR is built into RTO practice.

Others thought the controlled environment made possible in simulations could lead to more authentic and streamlined assessment of the application of skills in a variety of contexts, enabling judgments about the achievement of competency.

Getting assessment in the workplace validated is easier when the RTO employs sessional teachers who are also working in the industry and are up to date with industry requirements, and available to observe and validate assessments. One TAFE teacher did, however, question whether this was ‘independent’ enough for the auditor. A community college interviewee saw a further benefit of having sessional trainers, who might also work in other RTOs. This resulted in the cross-pollination of ideas and approaches. One TAFE perspective on engaging employers in validation was less positive:

The majority of employers employ TAFE to do the training. They don’t want to be involved in the examinations – it’s hard to get them even to come along to a breakfast.

One TAFE institute manager said they were trialling an IT system so that real-time assessment and feedback could be captured and aligned to the task and observation. This leads to the issue of paperwork.

Grappling with paperwork

While systems to streamline evidence collection and compliance workflows exist, and organisations large and small are deploying IT solutions, the ‘paperwork’ involved in validating assessment is a source of frustration. One community college manager was blunt, saying ‘trainers hate paperwork; they are time poor’.

A TAFE manager said that paperwork now represented 70 per cent of a trainer’s role. A private provider complained he had experienced 100 per cent turnover of staff twice in recent years because they get sick of the paperwork. No one, he said, could stay on top of recording their notes or observations of an assessment. Storing this evidence was also a problem, with both a public and private provider commenting on the need to build more storage space.

As two respondents noted, digital solutions can help:

Zoom means things are time stamped. We keep recordings as evidence. (Private provider)

Staff need to get into the habit of uploading the documentation/evidence of assessment for the validations. (TAFE institute)

Getting industry engagement in validation can also be frustrated by the paperwork. For example, if there is no access to the RTO’s internal systems and the relevant electronic files, distributing assessment tools to industry validators can involve reams of paper, time and money.

Conducting validation meetings

All of the RTOs consulted had established information-sharing mechanisms for both informal and more formal validation.

We hold a PD session every Monday so staff are aware of what’s happening in the sector. (Private provider)

We have a lead validator (not the person who has taught the qual) plus the team. (TAFE institute)

The lead validator is independent of the teaching area – advice is to engage external industry people but given this is difficult need to show evidence of an attempt to do so. Not a lot of industry engagement. (TAFE institute)

Validation meetings take a full day. It is difficult to get employers to commit that much time. (TAFE institute)

We try to source former students to help with work placements and validation. (TAFE institute)

Our rubrics give an independent person a good idea of what we are looking for. We convene reference groups to get feedback from employers – this needs to be enticing, offering some status (for example, a position as chair) and being clear and honest about time commitments. (Private provider with TAE on scope)

While such validation does routinely include someone independent of the person who undertook the training and assessment, getting external validators is not easy:

Getting employers as external validators is a challenge; it is easier to have internal trainers who are working in industry. (TAFE institute)

The issue of guarding intellectual property in the validation process was scarcely commented upon and did not arise as a major impediment to external validation. One private provider observed that in their industry (TAE training), once the student has the assessment tools, they are no longer confidential.

Communities of practice⁵ were seen as a way to help with the cost burden of validation but would need to take account of confidentiality and be structured to avoid imposing excessive time demands, especially on employers. It did emerge that RTOs would be more comfortable collaborating with colleagues from the same sub-sector of the VET system, that is, within the TAFE network; as community providers; or as members of an association such as the Independent Tertiary Education Council Australia (ITECA).

Using the evidence

Evidence is not simply stored away to await an audit.

At one community college, it is administrative staff who check that the sign-off paperwork is complete and correct:

If they see patterns, for example, lots of students having trouble with a particular assessment, this is taken on board. We examine the assessment tool and modify it or fix up the language of a learning resource. This sort of internal validation is taking place but needs to be better documented.

The same college administrator mentioned that feedback from students can also be instructive, especially if they have experience in the industry, while feedback from employers had led the college to no longer offer refreshers in some work, health and safety competencies (for example, working in a confined space) but instead insisted that people undertake the full course again because of the way things had changed:

5 See the discussion starter distributed to interviewees (appendix A). This document drew on publicly available evidence relating to previous models of independent validation used or trialled, including communities of practice that bring together internal and external auditors/assessors, practitioners, management, educational and instructional designers and others, including employers.

We have good validators on board because we delivered the TAE. The assessment managers go through every assessment to maintain the standard of evidence, which is set by who we fail. They go back to the trainer to discuss issues. This feedback is a coaching mechanism: more valid than picking a qualification to validate every few months. (Private provider)

A private provider acknowledged that in the past they had not had a strong feedback loop. To address this weakness, they introduced a template to document actions, for example adding more guidance to the marking guide, and a register of updates.

In a TAFE institute where the process is centralised, feedback is dealt with in various ways:

If the tool is the issue, this is feedback for those responsible for responding to changes in training packages and developing assessment tools. If the issue relates to teaching practice, that is dealt with in local compliance teams.

Undertaking moderation and graded assessment

As mentioned, moderation, the practice of bringing assessment judgments into alignment, did not feature prominently in the interviews, primarily because it is not part of the standards, but also because the competency-based system, in which students can progress at a different pace, makes moderation a very complex task.

Moderation doesn't really apply in VET in the same way it does for knowledge testing. What is needed to assess competency and work-readiness is a practical demonstration of skills, which depends on individual judgment. (TAFE institute)

One private RTO with expertise in validation services explained that his team held speedy moderation meetings if a student queried something. The matter was discussed over Yammer (social networking service) and a response formulated. One TAFE institute manager had looked at what it could learn from the school sector in terms of moderating assessments, considering that these would help to create uniform benchmarks, but also observing that it would be a very expensive undertaking.

The discussions about benchmarks also led to the question of graded assessment, a term that has an uneasy place in a system based on achieving competency, not grades. This has relevance to the issue of validation insofar as it raises the question of how the system achieves consistent signals about the calibre of graduates. One interviewee first asserted it wasn't possible to have graded assessment and preserve the notion of competency but went on to speculate whether grades could be applied at AQF levels above certificate IV.

Another interviewee asked: 'Is competency the backbone of a system striving for excellence?' The answer is not clear, although most people considered that any system of grading should exist alongside the formal system, as a way to signal quality, not only of their graduates but also as a means of distinguishing their RTO.

An RTO could award medals of excellence, digital badges, but not as part of the official transcript. (Private provider)

Graded performance would help the employer choose a graduate. (TAFE institute)

The current Victorian pilots of external assessment for apprenticeships have drawn on the World Skills methodology to devise assessments. In doing so, they may be going beyond determining competence towards proficiency in the workplace. An expert in World Skills, who has been involved in the pilots, argued that assessment tools can and must be detailed, with the skills being examined broken down in the marking rubric so that nothing is open to interpretation. Timed assessments with weightings can determine excellence and can be delivered according to the marking rubrics, which in turn can be easily validated.

As this expert commented:

The marking rubric can be a judgment control. If something is measurable, then assessment can be detailed. And any assessor can mark it.

A TAFE manager who supports the World Skills team in her region observed: ‘World Skills helps student be competitive in the job market but it’s not for everyone’.

And it is a long way from the current norm in VET delivery.



Issues facing the sector

The previous chapter presented views of interviewees and showed how RTOs approach validation, highlighting commonalities and differences. These represent a sample of conscientious people and organisations, all of whom understand the importance of compliance and who are striving to deliver quality training for their students. Many acknowledged that validation was also sound business practice and a means of continuous improvement. This snapshot also revealed many of the same wicked problems identified in previous reviews and attempts at reform (see support document 1).

Key points

- Validation of assessment is more difficult when workplace competence requires application of soft skills, as is the case in the care industries, or when the skills being imparted are quite generic, as in business qualifications.
- The feedback loop from validation to training package improvement needs strengthening.

Not a uniform sector

Approaches to, and opinions about, how to assess and validate assessment vary depending on the qualification type and the nature of the training packages. For those qualifications that involve licensing (electrical trades, for example) or registration (nursing), independent external validation is already part of certification and it would appear simpler to be prescriptive in terms of assessment and its validation.

For those qualifications that entail personal interactions (community care) or are generic (business), making judgments about competence or work-readiness and validating these is more complicated, as is the whole business of training and assessment.

We undertake validation also when a new TP comes out. There have been big changes in the business package, including units on big data. It's not clear these match the needs of employers of entry-level people in a receptionist role or trainees at a food outlet. (Community provider)

Who is industry? In community services there are big providers with resources to devote to training and assessment but also a long tail of small providers who are not represented but have different views on what graduates should be able to do. (TAFE institute)

These instances demonstrate the dilemmas facing such a diverse training system. How can the balance between flexibility and prescription be achieved? Should standards be more generic or less? How wide-ranging within these can training and assessment strategies be, while delivering a recognisable and transferable occupation standard? These big systemic questions were touched upon most of the interviews, underlining how interwoven the specific issue of validation is with the entire practice of training, assessment and quality assurance. This may go some way to explaining the persistence of definitional confusion that has characterised the topic for two decades.

The way RTOs operate – their business models, their scope and the nature of their student and employer clientele – also influences validation practices. Very large institutions with dispersed teaching units – the TAFE institutes in this project – can invest in systems and specialised staff, but this may reduce validation to primarily a compliance measure because, for example, responsibility for creating assessment tools is centralised and therefore remote from the actual circumstances of training.

If an RTO has contracts with government departments or other large entities and/or operates in several states, the compliance burden can be magnified, with further quality control measures required.

Apprenticeship contracts and government training programs have obligations incorporated. They sign off on the training plans, and at the end. Regulation and funding drive behaviour.

(TAFE institute)

RTOs with fewer qualifications on scope, and which specialise or are embedded in a local community, appear to have more opportunity to work with their employers to refine their assessments but, depending on the nature of their students, their purpose may not be narrowly vocational: they may be imparting employability skills rather than specific job training.

The connection between training and industry is also not uniform. Even when learning does take place in the workplace, it does not always follow that the employer will be in a position to validate the assessment if this is understood to be a judgment about the outcomes of training. Employers know what they expect of a graduate but are not usually competent in instructional design, training and assessment. This led in the discussions to repeated ruminations about two types of validation, both potentially independent of the trainer or assessor: internal validation of assessment tools, assessors and the assessment system; external certification of workplace proficiency.

There was no consensus about the importance of training and assessment in the workplace (as opposed to simulation), although the disruption caused by COVID has forced adaptation in this, as well as other areas of operating online.

The feedback loop from assessors to training package developers

Australia's VET system has occupational standards at its heart. It is therefore not surprising that training packages received frequent mention and critique in this project and were seen as part of the solution to any attempt to improve quality in the system.

From an RTO perspective, a flaw in the validation loop is the lack of feedback to skills service organisations about the content of training packages and assessment requirements.

Industry is not at the centre. While they help with the formulation of occupational standards, they are out of the loop at the evaluation stage.

(Private provider)

Consultation on rewrites of TPs is not done well. They don't hear from the grassroots.

(TAFE institute)

SSOs don't give us not enough time to give feedback.

(Private provider)

The TAE is not aligned to industry practice. It and other TPs are teaching people things they won't do.

(Private provider)

One private provider suggested that a way to better tie occupational standards to meaningful workforce development would be to tie these standards to capability frameworks and workforce plans. This might also lead to better defined expectations of what it means to be work ready.

A TAFE representative suggested more initial industry engagement in assessment to reduce vagueness in training packages. Another stressed:

We have to have the right language. If we start talking in our jargon, we lose the employers. If they think the conversation is a tick-and-flick exercise, you'll also lose them. (TAFE institute)

And one private provider thought the sector should be ambitious and aim for system-wide, uniform and good-quality assessment resources, developed by the system for the system and not by commercial third-party developers.

COVID-19

While at face value the restrictions imposed during the COVID-19 pandemic have led to isolation, in the VET sector they have prompted greater collaboration. As one interviewee from a TAFE institute noted: 'Our quality network across the country has been invigorated during COVID'.

Another TAFE representative observed that industry engagement has improved, with businesses having to become more familiar with Zoom, Teams and so forth. While upgrading their IT support to communicate with customers, they have become more open to using these technologies for other purposes:

We hold shorter, more frequent industry consultations, at convenient times – say half an hour at 4.30 pm once the garage owner has shut the workshop. These are short, sharp and regular and give industry partners updates, for example, on training packages. We also explore employer capacity to support our training.

Another TAFE teacher considered that online forums might be a way to encourage a greater cross-section of an industry to become involved in validation.

Industry engagement is vital because changes come at the rate of knots. This engagement has improved with COVID. (TAFE institute)

Responding to COVID restrictions has also begun to break down some of the perceived barriers to using technology in assessment. Cameras are now being used in the workplace to gather evidence, with the added benefit of reducing the duplication of documenting compliance. As mentioned above, there has also been uptake of Zoom and Facetime as a digital means of capturing evidence. And simulated activities have had to be introduced for those not able to train in the workplace. Real-time data are also proving useful:

Digital feedback is informing quality – student and employer feedback is more detailed and timely and can be collated centrally to reveal patterns in delivery and assessment. (TAFE institute)



Validation as continuous improvement

While ensuring compliance with the RTO Standards is at the forefront, the training providers interviewed for this project indicated an appetite for the changes underway to shift towards achieving continuous improvement and aiming for excellence.

The role of the regulator

There was a sense that ASQA's reorientation towards self-assurance would contribute to this focus on quality, although interviewees were still uncertain about how this would manifest, including in the validation of assessment requirements and auditing. Many mentioned the potential for ASQA to play a more proactive part in facilitating the feedback loop and for those conducting audits of compliance to either be better informed about assessment and the industry under observation, or to be accompanied by subject matter experts. Not only would this help close the loop but might lead to greater compliance.

Regulators are validators: audits perform this function and could do it much better, especially if they involved subject-matter/industry experts and a mechanism for feedback to the training package about difficulties in delivering the training packages. (Private provider)

It would be good for the ASQA audit to be with a subject-matter expert and to have a direct feedback loop to the standards as well as the RTO. This could weave the trainer's voice into reform of training packages. (TAFE institute)

We offer an independent validation service. Among our findings is that RTO validation has not been identified as non-compliance. (Private provider)

As ASQA noted in its submission to the Productivity Commission, it is building capability internally, and will soon begin to support building capability in the sector, which will drive quality and help students and employers to know what to look for in terms of that quality. Commenting on a draft of this paper, ASQA observed:

Effective validation and moderation are two areas that can influence the delivery of quality VET, and ASQA encourages RTOs to engage employers, industry, peak bodies and other parties in their validation and moderation practices. Aligning assessment outcomes with relevant industry and employer needs promotes confidence in the VET sector and the integrity of the training product being delivered.⁶

Professional development

A shift in culture requires time and resources. As an interviewee involved in the United Kingdom's move to apprenticeship standards remarked:

[This] was as much a culture change as it was a policy change and to change a culture it needs to be nurtured. Further Education [the equivalent of VET providers] especially were not geared up for the

Key points

- A shift in mentality from compliance to quality assurance will help to reap the rewards from validation.
- Greater professional development for trainers and assessors, and greater specialisation in assessment, is needed.

⁶ Rob Crispe, General Manager, Regulatory Engagement and Education, ASQA, pers. comm., 13 January 2021.

changes and the longer you allow the old system to overlap the new system the longer you give people to avoid the switch and avoid the support that is in place at the start.

A robust programme of development and support needs to be in place and to continue over the first cycle of switching which for us has lasted several years.

This type of support is even more necessary in a system that has not singled out validation as a specific skill and a component of career development. Individuals repeatedly spoke about the sector's lack of assessment skill or lack of confidence in the trainer's ability to understand what was required and how to validate good practice. One TAFE manager mentioned that staff responding to a survey about validation practices in the institute made it clear they wanted professional development in this area. Other comments conveyed the same message:

Trainers and assessors don't have skills to validate because they do not understand principles of assessment, rules of evidence or the regulatory environment. (Private provider)

It is really important for teacher practice to have PD so they know what evidence they must provide and see that validation can contribute to vocational competence and currency ... but there is no extra funding for PD. (TAFE institute)

The workforce needs upskilling; the diploma of TAE concentrates on content development not on assessment. (Private provider)

In some interviews, people talked favourably about the idea floated in the 2018 Braithwaite review, of having expert assessors to achieve consistency across the system. The review (pp.72–3) proposed the following:

A Master Assessor would be placed at the pinnacle of the VET teacher/trainer career path with the responsibility to mentor through professional development programs and assess the quality of an RTO's next cohort of graduating students...

A Master Assessor would visit an RTO and provide an independent work-based assessment of a cohort of students who were about to graduate in a particular field. Their assessment would be in the form of a master class where teachers, ASQA auditors, even the RTO's product developers could see how well the cohort of students could perform the tasks expected of them.

This recommendation was noted in the Australian Government's response to the review. That the role of a master assessor had some appeal points to the broader concerns about the skill level of assessors and their knowledge of the standards. The role of a master assessor, independent of the RTO, could potentially combine roles of moderation, quality assurance and professional development. One interviewee talked about career progression including a stint as a 'verifier', as both a measure of quality control and a celebration of good practice.

Interviewees were asked for their view on communities of practice as a mechanism for moderation and validation. (These were a popular method trialled in the 2012 National Partnership Agreement pilots conducted from 2014 to 2016; see support document 1, pp.14–15.) The following are two of the responses to this question:

Communities of practice could bring benefits beyond compliance like sharing of experience. (TAFE institute)

Professional development is an opportunity to share practice and also to earn PD points and to demonstrate VET currency. (TAFE institute)

TAFE Directors Australia (TDA) indicated it would be interested in playing a role in the validation process undertaken by TAFE institutes.



Changing things: begin with the end

Assessment is the beginning of the process – it informs the curriculum development and training. We need to turn things on their head (Skills service organisation)

Understanding what vocational competency and work-readiness look like is a foundation stone for a system built around occupational standards. That is why the title of this report, *Begin with the end*, suggests bringing assessment and certification to the fore of training package development, implementation and adjustment, with validation processes helping to inform improvements. For some of those interviewed, this meant more specific assessment requirements being set out in the training package itself, rather than in companion documents; other interviewees suggested a centralised way of developing assessment tools and regulating these:⁷

Key points

- To increase confidence in judgments about vocational competency and work-readiness, assessment needs to be brought to the fore in determining occupational standards.
- There remains an important role for a third-party validator, which might be achieved by separating training and assessment. This would represent a significant shift in the system.

Assessment would be better in the TP itself.

(Community provider)

The system would be 10 times simpler if the tools were standardised.

(Private provider)

Could there not be a way to share curriculum and assessment resources across the country that would take a huge burden off individual RTOs?

(TAFE institute)

The VET sector needs system-wide support for good quality resources.

(Software developer)

We need consistency to help make things audit-friendly and so that a third party can understand how the validation has been acted upon.

(Private provider)

Views differed on what can and cannot be prescribed or detailed, with contextualisation to local job and student needs emphasised.

Too much detail dilutes the idea that the training package is the benchmark and RTOs deliver to that standard according to their own requirements. Don't overload the training package: more can be achieved in part with greater clarity from industry about what is expected.

(Skills service organisation)

Developing a uniform assessment tool for all RTOs may not take into consideration the diversity of needs and circumstances across the broader sector.

(ASQA)

⁷ It is worth noting that this lack of confidence about assessment is not new and, on occasion, has attracted national interventions. In 2001, the federal department (Department of Education, Training and Youth Affairs) provided a \$13.5 million grant to develop specific support materials for training package implementation and resources to underpin quality assessment. *Inter alia*, 10 guides to accompany these materials were developed and introduced to VET practitioners around the country via a series of professional development sessions (Clayton 2002).

Who validates what?

To answer this question, another must first be answered: should the trainer be the assessor? Most educators see assessment (at least formative assessment) as integral to the learning process. But is that also the case for summative assessment, which leads to a credential? In Europe, the term is 'certification', which, when it comes to the process of validating the outcomes of vocational learning and issuing a qualification that signals work-readiness, may be a useful change in terminology.

While the Australian system is based primarily (licensed trades and regulated professions being the exceptions) on the RTO training, assessing and issuing a qualification, here too there are signs that things could change. In Victoria, the government is piloting independent assessments in a range of Victorian apprenticeships and traineeships, an approach that involves paid assessors, who are external to the RTO and who conduct their assessments (of practice and theory) after the apprentice or trainee has completed their course. The aim of the pilots is 'to provide consistent feedback on training outcomes to all users of the apprenticeship and traineeship system'.⁸ What is being measured is workplace proficiency, seen in this context as a notch above the benchmark defined in units of competency or training packages. Were these pilots to deliver favourable results, there would be significant implications for the way RTOs are funded and credentials issued.

This separation of the roles of training and assessing was mentioned during the interviews:

Could the RTO do the formative assessment, then the end assessment goes beyond the RTO into workplace? Who would do it; who would fund it? (Private provider)

The RTO is assessing and validating learning outcomes. Industry validation is the application of the learning in the workplace. (TAFE institute)

Trainers see how unit of competency is being learned. So, the certification of competence comes from the RTO; the employer or industry certifies proficiency or issues a workplace licence. (Private provider)

In some industries with licensing arrangements, this is the status quo. For others, it could mean introducing external examinations or capstone projects. This raises another question: who would have responsibility for verification of the assessments and graduate outcomes? In New Zealand it is the regulatory authority; in the United Kingdom there are end-point assessment organisations.

And when would this occur? The Victorian pilots are assessing graduates (or people close to completion). The Digital Skills Organisation is experimenting with a phased approach. Graduates will eventually receive industry certification, having first passed a skills test. The RTO will receive milestone payments: a small amount when conducting the training; a further payment when the test is passed; and the final when the graduate is placed in the job. This will, as the organisation acknowledges, need careful planning, for example, to avoid skewing training volume towards the most easily placed graduates.

That said, such an approach is unlikely to suit all fields of education. As a private provider with many Indigenous students noted:

Not all training results in a job outcome. VET can also develop transferable skills to help people become employable or upskill them. Moreover, some people gain the skills and get a job before formal completion.

⁸ <<https://www.education.vic.gov.au/about/programs/Pages/VETindependentassessment.aspx?Redirect=1>>.

In his submission to the Productivity Commission's interim report, Tom Karmel (2020, p.3) pointed out that separating assessment from instruction would:

enable very light touch regulation in VET delivery but would provide assurance that an individual student was competent. It would certainly free up the providers. It would also provide a direct measure of quality of the provider by means of the 'pass' rate of its candidates.

In their submission, Skills Impact (2020, p.15) also argued for a separation:

most proficiency assessment is carried out following workplace-based practice and based on real evidence of work being performed. Unfortunately, the current system places 100% responsibility on RTOs to deliver these outcomes and assessments and RTOs are generally poorly positioned to do so. It is prohibitively expensive and inefficient to continue to maintain a system where RTOs are responsible for performing accurate industry-based assessment of competency, when they cannot afford the resources to do so and therefore rarely do this with quality or relevance. We recommend a system where RTOs deliver skills, capabilities and knowledge to the degree possible within learning institutions and simulated worksites, and industry are responsible for delivering proficiency through workplace practice and supervision.

These suggestions that training and assessment be separated are gaining momentum. While this would satisfy the requirement for independence, the question would still remain about how these practices are quality assured. In the United Kingdom the regulator has oversight of independent end-point assessment of apprenticeships. The New Zealand Qualifications Authority has national external moderation systems to ensure that assessment decisions and standards are consistent nationally (see support document 2). Both systems aim to improve confidence in the quality of qualifications being granted across the country and suggest a continuing role for a third-party validator.



Moving from compliance to trust

The future of the VET sector depends not only on its agility, but the restoration of public trust in the value that it delivers, as the core justification for both public and private investment.

(Hurley & Van Dyke 2019)

The Organisation for Economic Co-operation and Development (OECD) has found that public trust is associated with co-operative behaviour and reduced transaction costs, including those spent on enforcing compliance. The views collated in this research project suggest that most RTOs in the Australian VET sector would agree. While commercial-in-confidence matters are often cited as barriers to cooperation, within the system of private, public and community providers there is potential for collaboration on improving assessment practices, which are a central plank in building quality. A new approach to regulation will be most welcome if it reduces the requirements perceived to be necessary for the auditors rather than as an integral part of the assessment process (for example, student papers, written tests, recordings of practical applications or checklists about these). Greater trust in professional practice and judgment would not remove the need for evidence of sound internal processes and of how assessment decisions are made, but were the paperwork reduced, the benefits of validating the robustness of the qualifications might come to the fore.

Constant reform has wearied the sector; nevertheless, RTOs seem prepared for more change, if it leads to benchmarks of quality that everyone understands. For that change to deliver positive results will require investment, with most interviewees pointing to the government as the source of funding as well as being responsible for the oversight of better assessment, professional development and investment in technological solutions (for example, virtual reality) and training. Within the sector, there is recognition that validation is a sensible business practice, and therefore something to budget for. However, most would welcome greater cooperation from industry to make workplace assessment and its validation an easier option and to ensure that the trainer voice is better heard in the development of the standards and assessment requirements. One way to do this would be to keep in clear view the purpose of the system – the development of workplace skills and employable graduates. Also needed is even more effort to foster communication between learners, trainers, employers and regulators to improve understanding of training packages and of the various parties' responsibilities. This research reveals that there remain many misconceptions about what a training package does or does not prescribe.

The willingness of industry to fund external certification beyond that which it supports now was not tested in this research. However, previous consultations and reviews (see support document 1) suggested that assessment is seen to be an RTO rather than an enterprise function. To change this would require a new method for calculating training and assessment and certification costs, and distributing funds accordingly – to the RTO, the employer, a master assessor, or some other independent third party, such as a licensing agency or the regulator.

All this could add up to turning the system on its head, making assessment the *beginning* of the process that informs the standards, curriculum development and training.

Key points

- Representatives of the RTOs interviewed in this project would welcome reform that leads to benchmarking quality, as well as to greater trust in professional practice.
- The trainer's voice needs to be incorporated better into training package development.



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Appendix A

Discussion starter

Research project: *Models for independent validation and moderation of assessment* (Researcher: Francesca Beddie, fbeddie@makeyourpoint.com.au)

Versions of validation practised or suggested in the past:

- 1 External panel site visits by industry subject matter experts and independent assessors to undertake moderation of borderline cases and validation exercises.
- 2 Central collection of assessment tools and outcomes by an independent external assessment body, which reviews their quality and ensures feedback to the training providers and training package designers.
 - Could this function be incorporated into the current training package system?
- 3 Regular meetings/forums of training providers, external industry experts and other stakeholders (for example, learners and unions) to conduct validations, determined by risk analysis and the timetable required by the Standards of Registration.
 - Such meetings would help to establish benchmarks, strengthen relationships between RTOs and industry, and maintain industry currency.
- 4 Communities of practice that bring together internal and external auditors/assessors, practitioners, management, educational and instructional designers and others.
 - By sharing examples of learner work, such communities of practice could also help to benchmark their work to ensure a common standard of assessment. These networks could also be used for moderation.
 - These communities could also be a vehicle of continuing professional development, another key ingredient in quality.
 - Does this again raise the question of the need for a national body to coordinate professional development?

A potential gamechanger is technology. As simulation, online proctoring, learner engagement in assessment using digital tools, and artificial intelligence become integrated into the system, is it time to look into how these tools can be harnessed in the realm of moderation and validation of competency-based training and assessment?



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