



Models for independent validation and moderation of assessment

An annotated timeline 2001–2020

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This document was produced by the author based on their research for the report *Begin with the end: RTO practices and views on independent validation of assessment* and is an added resource for further information. The report is available on NCVER's Portal: <<https://www.ncver.edu.au>>.

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Contents

Tables	4
Why validate assessment?	5
Definitions	5
The timeline	7
2001-2007	7
2008-2012	7
2011-2012	10
2012-2013	10
2014-2015	13
2016	16
2017-2018	20
2018-2019	21
2020	22
References	25

Tables

Tables

1	The distinctive features of validation and moderation (NQC 2009)	8
2	Principles of validation (NQC 2009, pp. 16–18)	9
3	VET Quality Project ASSESSMENT MEASURES (Table A.2, Noonan and Condon 2013, pp.50-51)	12

Why validate assessment?

Getting assessment right in order to signal the quality of outcomes from Australia's vocational and education training (VET) system has been a perennial challenge. Another is to find the best ways to secure employer engagement in validating assessments of vocational competence. This annotated timeline outlines the attempts made to address these challenges.

At the outset it is important to observe that independent validation or moderation of that assessment is not a driver of quality in itself but rather a mechanism for identifying recommendations for improvements to the assessment tool, assessment process or assessment outcome. It can also build stronger relationships between registered training providers (RTOs) and employers and serve to improve the industry relevance of training.

Key points

- Independent validation of assessment has been on the VET agenda for decades.
- Getting validation right and securing employer engagement in the process is not straightforward but is important as a mechanism for improving assessment tools and practices.
- This in turn can build confidence in the quality and relevance of training.

Definitions

Inadequate understanding of the terminology used in the regulation and perception of VET quality has emerged as a significant impediment to improving assessment. For that reason, this paper begins with a set of definitions.

In the National Quality Council's Code of Professional Practice for Validation and Moderation (NQC, 2009), competency-based assessment was defined as a:

purposeful process of systematically gathering, interpreting, recording and communicating to stakeholders, information on candidate development against industry competency standards and/or learning outcomes (NQC 2009, p.19).

Confidence in that 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, with moderation being associated with quality control and validation with quality review. The Australian Skills Quality Agency (ASQA 2020) explains these two terms that 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. 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. A statistically valid sample is one that is taken randomly from the set of assessment judgements being considered and that is sufficiently large that the outcomes of validation of the sample can be applied to the entire set of judgements.

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 (July 2020) 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.

In this project, the emphasis is on the employer’s role in this independent and external quality assurance process.

The timeline

2001–2007

The introduction of the Australian Quality Training Framework in 2001 placed an increased emphasis on quality in the national VET system. When updated in 2007, its focus turned to the outcomes being achieved for clients of the system. Assessment was emphasised in the revised standards, including its relevance to the workplace (AQTF 2007).

2008–2010

As part of an extensive study to see how vocational education could bridge the gap between learning and jobs (OECD 2010), the OECD conducted reviews of VET systems among its members, including Australia. That review of Australian VET (OECD 2008) argued for standardised assessment to ensure consistency, saying training packages should be replaced by simple and much briefer statements of skills standards. It thought consistency of those standards across Australia could be achieved through a common assessment procedure to determine whether the necessary skills had been acquired (OECD 2008, p.6). This would retain the focus on the outcomes of training being relevant to industry (without being too firm-specific to facilitate labour mobility). The review also pointed to a persistent problem in Australia's competency-based system: the language of training packages, which is repeatedly mentioned in the conversation about validating assessment.

The OECD suggested 'that diplomas based on central exit exams are valued more highly by employers, because they give better information about applicants' capacities' (OECD 2008, p.33), saying such 'a standardised assessment ensures consistency in the mix of competencies acquired across Australia, and consistency in the level of competencies necessary to pass the test. It also provides a clear basis for recognition of prior learning, allows competencies to be acquired in diverse ways, encourages innovation and efficiency in the acquisition process, and guarantees common standards for the type and level of competencies acquired' (OECD 2008, p.39). As Gerald Burke (2018, p.4) noted, this advice on assessment was not taken, although it remained a matter of consideration *inter alia* by Skills Australia (see below).

Also, in 2008, the National Quality Council (NQC) commissioned an investigation into industry expectations of vocational education and training assessment. This entailed more than 60 interviews, the responses of approximately 80 people to an online survey and submissions from peak bodies and industry associations. The researchers found that 59 per cent of respondents to the survey had concerns about consistency in the way assessment was conducted. The report presented a concept for an 'ideal' assessment system in terms of meeting industry expectations. Elements relevant to this current review were:

- A very well written training package with clearly expressed standards and stronger assessment advice, including clarity about the required conditions of assessment.
- Prioritisation of critical units of competency in terms of the level of specificity applied by developers, and the level of scrutiny applied by assessors and by auditors.
- Competent assessors with current industry knowledge and experience preferably working in partnership with the enterprise.
- Assessors working with the national competency standards to contextualise the standards for individual enterprises or workplaces.

- *Moderation of assessments including input from industry, assessors, and Industry Skills Councils as developers of the Training Packages.*
- Rigorous assessment processes that added value to the enterprise as well as to the individual learner
- *A close working relationship between the RTO and the enterprise with effective lines of communication so that employers were informed about the progress of their employees.* (NQC 2008, p.7, author’s emphasis)

The following year, the NQC published a Code of Professional Practice with guidance on how to conduct assessment validation and moderation within a VET setting. A table in that document (NQC 2009, p.7) clearly sets out the roles of, and differences between, validation and moderation:

Table 1: The distinctive features of validation and moderation (NQC 2009)

Features	Validation	Moderation
Assessment Quality Management Type	Quality Review	Quality Control
Primary Purpose	Continuous improvement	Bring judgements and standards into alignment
Timing	On-going	Prior to the finalisation of candidate results
Focus	Assessment Tools; and Candidate Evidence (including assessor judgements) (desirable only)	Assessment Tools; and Candidate Evidence, including assessor judgements (mandatory)
Type of Approaches	Assessor Partnerships Consensus Meetings External (validators or panels)	Consensus Meetings External (moderators or panels) Statistical
Outcomes	Recommendation for future improvements	Recommendations for future improvements; and Adjustments to assessor judgements (if required)

The code discusses four broad approaches to validation and moderation. These are set out here because they resemble models mooted over the next decade (NQC 2009, pp.12-14).

- **Assessor Partnerships (Validation only):** assessment tools, processes and outcomes are shared and discussed within a small group of assessors, possibly even just two assessors, with a focus on collegiality, mutual assistance and confirmation. These partnerships can be locally organised, with minimal resources, and can help build confidence and expertise. However, there is also a possibility that some assessor partnerships may simply reinforce misconceptions and mistakes if there are no other quality review processes available.
- **Consensus Meetings (Validation and Moderation):** these meetings within or across organisations involve assessors reviewing their own and their colleagues’ assessment tools and outcomes as part of a group. If used for moderation purposes, consensus meetings provide less quality control than external and statistical approaches as they can be influenced by local values and expectations.
- **External Approaches (Validation and Moderation):** 1) an external person (or a panel of people) visits the organisation to judge the way in which candidates’ evidence was collected and judged against the Unit(s) of Competency. For moderation purposes, the differences between the local and external assessment judgements can be reconciled accordingly. For validation, the discussion would focus on improvements in future assessment practices. 2) samples of assessment tools and/or judged candidate evidence is sent to a central location for specialist assessors to review directly against the Unit(s) of Competency. The specialist external assessors could be representatives of the relevant national Industry Skills Council (ISC) and/or the relevant state/territory registering bodies. Differences

between the organisation and the external-based assessments could then be discussed (e.g. for validation) and/or reconciled (e.g. for moderation) at a distance.

- **Statistical Moderation:** this approach could ensure that RTO-based assessments are comparable throughout the nation. However, to implement such moderation, some form of a common assessment task(s) would need to be introduced at a national level in the VET sector (e.g. external exam or standardised assessment tools) to moderate the organisation-based assessments. This might be similar to those used for licensing purposes. The major benefit of statistical moderation is that it provides the strongest form of quality control over organisation-based assessments. It can also be less expensive to implement and maintain (if paper-based) than external moderation processes. However, if paper-based (as has been typically implemented in other educational sectors), then any adjustments to candidate results would be limited to estimates of candidates' cognitive skills (i.e. knowledge and understanding); and therefore may have limited validity within the VET sector.

The next table sets out the principles of validation.

Table 2: Principles of validation (NQC 2009, pp. 16–18)

Principle	Definition
Transparent	The purpose, process and implications of validation and/or moderation should be transparent to all relevant stakeholders.
Representative	It is not possible or necessary to validate and/or moderate every possible assessment tool or piece of candidate evidence within an RTO at one time. A representative sample should therefore be used to validate and/or moderate assessment tools and judgements. A properly selected representative sample can identify any issues with assessment practices and decisions.
Confidential	Information regarding individuals (i.e. assessors and candidates) and providers must be treated with sensitivity and discretion. Confidentiality should be observed in relation to the identity of the assessors (i.e. those who developed the assessment tools and/or made the judgements) and candidates (i.e. those whose evidence is submitted in the process). This allows the validation and/or moderation process to focus on the quality of the assessment tools and the assessment judgements rather than the individuals involved.
Educative	Validation and/or moderation should form an integral rather than separate part of the assessment process. It should provide constructive feedback, which leads to continuous improvement across the organisation.
Equitable	Validation and/or moderation must be demonstrably fair, equitably applied and unbiased.
Tolerable	Any assessment includes a margin of error. The way in which evidence is gathered and interpreted against the standards will vary. The challenge is to limit the variation to acceptable proportions. Validation and/or moderation enable the variation to be identified and limited to what is tolerable.

In 2010, Gillis, Dyson and Bateman undertook further work, in the form of case studies, to gain insights into the implementation of validation and/or moderation processes. These studies were conducted in a diverse range of RTOs and revealed:

- the need for more simple guidance, including forms and templates
- financial assistance to support the processes
- sampling based on risk factors (e.g. new assessors, new training package)
- the development of a culture within RTOs that saw moderation and validation as useful elements of quality management and team building, rather than just compliance measures (Gillis, Dyson and Bateman 2010, p.38).

The rationale for moderation was generally seen as being a formal process to resolve any discrepancies between the on and off-the-job assessments, and to identify 'at risk' students in a timely manner. The research found little support among the RTOs for external and statistical moderation processes.

2011–2012

In May 2011, Skills Australia put out its roadmap for VET, *Skills for Prosperity*, in which it reported that:

The debate over quality is the issue that most troubles VET stakeholders. This review identified the need for a comprehensive package of reforms in the sector's quality practices, especially in the delivery of teaching and assessment. This includes more decisive resolution of poor registered training organisation (RTO) performance, transparent assessment practices, improved availability of data on performance of individual RTOs, and greater depth in the professional requirements for practitioners in the sector (p.5).

Skills Australia went on to recommend that Australian governments agree to:

- a) reform the Australian Quality Training Framework to include implementation of mandatory external validation of providers' assessments, both on and off the job
- b) incorporate the requirement for RTOs to undertake external validation as a feature of the next intergovernmental resourcing agreement for the sector (Skills Australia 2011, p.14).

Such validation would consider both the assessment process, including the tools used, and the assessment outcomes and would mitigate 'high-risk activity in the sector – the practice of allowing providers to both do assessments and issue credentials' (p.86). Skills Australia proposed that monitoring occur through the national VET regulator and that sample audits might include a role for industry experts such as industry skills councils together with experts in teaching, learning and assessment. It also recommended publishing the assessment validation results on the *My Skills* website (2011, p.6). These recommendations were based on strong support during consultations for external moderation and validation, albeit without consensus on how this might occur.

The Commonwealth and states and territories responded. In 2012 the National Partnership Agreement on Skills Reform, which set out the goals and structures of intergovernmental VET funding and reform for the period 2012-13 to 2016-17, committed in clause 27 to improve the quality of VET teaching and training including through:

development and piloting of independent validation of RTO assessment practices with a view to informing the development of a national model.

Along with funding to implement and publish quality measures on *My Skills*, \$1.084 million were allocated over four years for these quality projects (National Partnership Agreement 2012, p.12).

2012–2013

At the same time as deciding on the pilots of external validation, the Industry Skills Councils (ISCs), with support from the National Skills Standards Council and the Department of Industry Innovation, Science, Research and Tertiary Education, commissioned the Allen Consulting Group (Noonan, P, Condon, L, 2013) to undertake a project on VET quality. The project arose out of the concern that, while ISCs were the bodies responsible for competency standard development, they had minimal ability to ensure that RTOs consistently interpreted, delivered and assessed the requirements of the standards for all units and qualifications. The project recommended that quality measures for assessment reside in the Standards for RTOs. This happened in 2015 (see below).

The report pointed to some possible reasons for the intractability of the problems besetting the implementation of independent external validation and moderation of assessment. Allen Consulting asked ISCs for their reaction to the quality measures they had devised. When it came to assessment the responses pointed to specific assessor requirements and the validation model being considered the most

important (Noonan and Condon 2013, p.41). At the same time, the ISCs made it clear (Noonan and Condon 2013, p.42) that implementing a validation model would be the most difficult both for them and for RTOs. They suggested getting the language of assessment right would be easier, although this has not proved to be the case, with language issues persisting up to now. As the Table 3 below shows, even 'independent' and 'external' were not clearly understood. Several models for independent external validators were suggested, with about half of the ISC responses favouring a consensus approach run by an external body and the other a more independent body with authoritative power (Noonan and Condon 2013, p.38). These bodies could be an RTO, an enterprise, the ISC or a regulator.

A theme running through the project was that efforts to improve quality should not be to the detriment of innovation (Noonan and Condon 2013, p. vii). An analysis of submissions to the Review of the Standards for the Regulation of VET (NSSC, 2012) had also revealed that the majority of respondents thought any national effort to improve quality should not adversely affect flexibility at the RTO level. Here again is a permanent tension in the national training system, namely, how to ensure consistent quality across the country while enabling training to be responsive to local and specific industry or even individual employer needs. This raises the question: does the sector need to rely on the professional judgment of its assessors and, if so, how can these people be supported to exercise that judgment in ways that increase confidence in the national system and what structures best ensure independence?

Reviews into the aged and community sector, first by the Productivity Commission (2011) and then the Australian Skills Quality Agency (2013), showed that the quality and quantity of training in the sector varied widely, with insufficient on-the-job or work-based training being provided and some trainers and assessors identified as not having current industry experience. This prompted an NCVER project that explored key issues in assessment focussing on Childcare and Aged Care Services and the Certificate IV in Training and Assessment (TAE). Halliday, Wynes and Misko concluded (2013, p.11):

there is a compelling case for strengthening the assessments in nationally recognised vocational education and training, especially in circumstances where the quality of assessments may be threatened by a rapid expansion in training delivery and/or registered training organisations.

They recommended having guidelines for encouraging industry involvement in assessments and explaining how to collect and judge evidence for the recognition of prior learning and identifying ways to supplement online assessments with other evidence. The guidelines should also help to establish some basic moderation and assessment principles.

As in other studies (earlier and later), the researchers found practitioners were less clear about the term moderation than validation (Halliday, Wynes and Misko 2013, p.21) and that the most frequently identified problems were employers' lack of time to commit to being involved in validating assessments followed by employers' lack of knowledge about the content of units of competency being assessed and the lack of clarity in the language of training packages. Another issue was the absence of a strong relationship between employers and providers (Halliday, Wynes and Misko 2013, p. 24).

Another 2013 project designed to improve industry confidence in nationally recognised qualifications was commissioned by the Flexible Learning Advisory Group. Gillis and Clayton examined six pilot programs in e-validation. They found that e-validation using a range of readily accessible, easily used and inexpensive technologies could be efficient. It could also help engage geographically remote industry and RTO representatives in the validation process (2013, p.5). Again, the need for flexibility to accommodate enterprises, the removal of 'VET Speak' and professional development for VET practitioners and industry representatives – in relation to the use of technology, as well as the processes and principles

Table 3: VET Quality Project ASSESSMENT MEASURES (table A.2, Noonan and Condon 2013, pp.50-51)

Measure	Definition	Options	Rationale
Validation model	Validation is a quality review process. It involves checking that the assessment tool produced valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the relevant aspects of the Training Package or accredited course had been met. It includes reviewing and making recommendations for future improvements to the assessment tool, process and outcomes.	<p>Options for designing and implementing different approaches to validation:</p> <ul style="list-style-type: none"> • Assessor partnership • Consensus: Internal parties • Consensus: Internal with external parties <p>Options for designing and implementing different approaches to <u>independent</u> validation:</p> <ul style="list-style-type: none"> • Consensus: Validators are independent parties (e.g. RTOs, enterprises, professional associations) • External: Validators are independent RTO(s) • External: Validators are independent enterprise(s) • External: Validators are independent body with authoritative power (e.g. Industry Skills Council, licensing body, ASQA) • Statistical: Validators are independent body with authoritative power (e.g. ISCA, employer associations, licensing bodies, ASQA, educational test development and measurement organisations) • Statistical: Validators are independent body with authoritative power (e.g. ISC, employer associations, licensing bodies) <p>Statistical: Validators are independent body with authoritative power (e.g. ISC, employer associations, licensing bodies, ASQA)⁷</p>	<p>Validation is seen as critical to quality of assessment.</p> <p>In 2012, COAG signed up to a set of reforms to the national training system; agreeing to a revised National Agreement for Skills and Workforce Development and a new National Partnership Agreement on Skills Reform.</p> <p>One key item in the agreement is for validation models to be piloted by state/territory finding bodies. Outcomes of these pilots should inform the development of validation models.</p> <p>'Independent' was a term used for this pilot as external validation as noted by NQC documents is one form of independent validation.</p> <p>External validation was proposed by Skills Australia and in the Review of Post-Secondary Education and Training in Queensland undertaken by ACG.</p> <p>ISCs could manage the type of validation model to be utilised in terms of industry involvement.</p>
Validation specifications	Validation specifications are specific requirements for implementing the model such as timing, sampling framework, validator qualification/experience, and focus (e.g. tool and/or judgements).	<p>Specific requirements for validation, e.g.</p> <ul style="list-style-type: none"> • Timing • Sampling (e.g. of qualifications, units, assessors, learner evidence) • Validator qualifications/experience • Review of tool and/or judgements 	<p>Identified in NQC 2009-a as part of validation implementation. Providing further advice could strengthen quality assurance arrangements.</p>

underpinning assessment and validation – were required. Because any form of validation is costly in terms of time and resources, they recommended that:

[t]o be sustainable, any mandatory requirements to have strong industry engagement in the validation process be limited to those qualifications/units of competency deemed to be high risk qualifications (Gillis and Clayton 2013, p.6).¹

2014–2015

Building on their own work as well as that done for the National Quality Council (NQC) by the Centre for Work-based Education of Victoria University, Precision Consulting, and Bateman and Giles, Misko and other researchers at NCVET set out to better understand the extent to which quality assessments were implemented in qualifications in the aged care, business services, electro-technology industry sectors, and in training and assessment. Their conclusion was that external assessments conducted by regulatory authorities or external assessors helped to standardise skill assessments, thus ensuring comparability and consistency of performance to industry standards (Misko et al., 2014, p.3). Employers' time constraints and inadequate experience or expertise did, however, work against their increased involvement in assessment validation or in conducting assessments. Here are some of the comments the researchers gathered when asking RTOs about the help they received from employers in validating assessments (Misko et al., 2014, p.24):

We have built good relationships and have trainers from industry, but getting employers involved can be difficult with more isolated industries. (Aged care, private provider)

We have constant contact with them [employers] but in regional areas it is difficult to get placements. We have tried to get input on assessments but employers are too busy. Some are happy to give verbal feedback, are reluctant to get involved because they don't want to formalise anything. (Aged care, public provider)

For business subjects it is very difficult as there is no governing body. Business qualifications act more like a pathway. They are very broad ... more like tasters, and can be morphed into different things, certificate III, IV, diploma, advanced diploma, OHS administration, advanced customer service. Getting employer involvement is easier for finance and marketing. I use my marketing manager networks and get a good response quite quickly. I have a big network so I am always able to get a core group. (Business and marketing, public provider)

Industry relies on the college to look after things to do with assessments. They do not have the time. It is also not their core business. They believe that this is college's job. (Electrical, public provider)

Where strong relationships between training providers and employers had been forged by mandatory work placements, validation could be easier, although employers did prefer to leave the process of assessment and validation to the experts. Nevertheless, the requirement for employers to provide evidence of apprentice performance in e-profiles or hard-copy logbooks did offer an opportunity to have some involvement in the validation of on-the-job assessments (Misko et al, 2014, p. 9).

Work on VET online e-assessment for the Flexible Learning Advisory Group published in 2014 identified significant areas of concern to employers, auditors, assessors and students around the rules of evidence

¹ The 2015 RTO Standards (ASQA) required, from 2016, RTOs wanting to add a TAE qualification or assessor skill set to their scope that they provide ASQA with evidence of an independent validation of their assessment system, tools, processes and outcomes (Clause 1.25—Independent validation of training and assessment qualifications).

and principles of assessment, especially the validity and reliability of the process, and the validity, sufficiency and authenticity of the evidence. Three other areas of concern were lack of clarity in the documented competency requirements, competence of assessors and available assessment resources (in Harris, 2015, p.27).

On 26 September 2014, the Council of Australian Governments (COAG) Industry and Skills Council agreed to new regulatory standards for training providers and regulators – the Standards for Registered Training Organisations (RTOs) 2015. These were explicit about the need for systematic validation defined as the ‘quality review of the assessment process’. The fact sheet issued in May 2015 by ASQA on conducting validation did not mandate external validation (but subsequently did make this a requirement of delivery of the Training and Education training package - see footnote on p.13) but advised:

Validators can be employees of your RTO, or you can seek external validators. For example, you can seek participation in your validation processes from:

- employers and employer associations
- other industry bodies
- trainers and assessors, or
- consultants (ASQA, May 2015).

During this time, the pilots on independent validation of RTO assessment processes were underway in the states and territories. The following themes emerged:

- What was meant by *external* validation of assessment is not well understood. Does it involve someone who is not part of the RTO or just not involved in delivery of the training? Does it represent an industry partner or specific employer? Does it simply require external representation in a validation exercise?
- Validation needed to focus on work readiness.
- Most pilots used written documentation, employer and student satisfaction surveys, panel meetings or forums with industry and VET representatives.
- Assessment needed to be highlighted within training package design, but the language of training packages was often not helpful to external validation.
- No single model would suit all qualifications.
- There was strong support for a risk-based approach.
- It was difficult to engage individual employers as independent validators; moreover, validation should be at an industry level not according to specific needs of one employer. This reflects the tension between national consistency and contextualisation to specific workplaces.
- Assessors needed professional development and some RTOs needed to improve industry engagement.
- The existing structures of industry engagement (IRCs) could be used for validation. External validation models are expensive but do have value and should therefore be decided according to a risk matrix.
- Quantitative data from surveys and audits is available. This should be augmented by qualitative data.
- The validation should be educative not a compliance measure. The concern/obstacle about confidentiality/commercial-in-confidence needed to be overcome.
- One model (trials in Western Australia, 2015) had validation overseen by an industry steering group, with assessment experts reviewing RTO assessment documentation against industry-endorsed quality

criteria, interviewing employers and some trainers. The result: benchmarks, constructive feedback to RTOs, as well as greater understanding among trainers about industry needs and vice versa.

- The then Industry Skills Council might play a role in co-ordinating effective independent industry validation of assessment. They could provide:
 - a clear definition of what independent industry validation entails
 - guidance on the role for each participant in the validation process
 - selection criteria for validators
 - professional development for industry validators
 - industry best practice benchmarks
 - guidance on ‘acceptable’ assessments for identified high-risk units of competency within the training package
 - guidance on validation when training packages are updated.
- Among the findings from South Australia (2016) was the importance of up-front assessment to ensure the student had chosen the right training, work placement and on-the-job training, and consistent assessment of these components of the training.

In September 2015, Senator Birmingham, the then Assistant Minister for Education and Training, established the Training and Assessment Working Group (TAWG) to develop reform options to improve the quality of assessment in VET in consultation with stakeholders. The Working Group consisted of representatives from industry and the VET sector. One of its terms of reference was to look into:

How independent validation of assessment may be applied to be industry-led, flexible and risk-based. Of consideration would be whether best practice models are sufficient, an exploration of the various benefits and risks to mandating independent validation of assessment in specific instances, with general consideration to appropriate implementation and cost benefit requirements (Australian Department of Education and Training 2016, p.1).

In November 2015, the COAG Industry and Skills Council (CISC) agreed the Australian Government minister would consult with VET stakeholders and all jurisdictions on options to improve the conduct of assessment in VET. CISC prioritised three areas for investigation: approaches to strengthening the skills of VET trainers and assessors; *consideration of improved validation of assessment, including potential for greater industry involvement*; and options for tougher regulatory interventions.

In December 2015, the review by Acil Allen Consulting of the National Partnership Agreement on Skills Reform (2012–2017) was handed to the Commonwealth and state governments. On external validation, it had this to report:

While trials of external validation were taking place in each states and territories, few stakeholders felt they were in a position to make an informed comment on the outcomes that have resulted from these trials. Where they did offer a view, there was a concern that external validations were, in part, skewed by their overly strong focus on students who had achieved employment outcomes, and not capturing the experiences of those who remained unemployed.

Additionally, stakeholders were concerned that the heavy use of ‘VET teaching and assessment language’ is hindering industry understanding of independent validation, and their ability to contribute to the process. Many consider that the role of industry and employers in raising the quality of VET is critical, and should be more strongly emphasised.

There was also some general criticism that there is a poor understanding of this aspect of the NP and its expected outcomes, in particular the NP's endpoint of 'informing the development of a national model', however the Review notes that the timing of consultations with stakeholders prevented consideration of a forthcoming report on the outcomes of external validation pilots (Acil Allen 2015, p.45).

It concluded that:

Subject to the results of the current trials on external validation of assessment and qualifications, such or similar approaches should be strongly featured in improving VET quality. There should also be consideration given to greater consistency in these roles across jurisdictions, to ensure that students and employers can have confidence in a quality standard that applies nationally (Acil Allen 2015, p.74).

Commenting more broadly on assessment the review noted that 'good practice is highly dependent on context and circumstance' (Acil Allen 2015p. 60).

2016

In January 2016, the Department of Education and Training issued a discussion paper *Quality of assessment in vocational education and training* that had been informed by deliberations of the Training and Assessment Working Group. The paper sought stakeholder views, *inter alia*, on 'assuring the quality of assessment through industry engagement with assessment review and control mechanisms as a gatekeeper before qualifications are issued, and ensuring employers have clear and realistic expectations of VET graduate capabilities which align with the assessment of students.' The discussion paper received 211 submissions from stakeholders including RTOs, industry bodies, regulators, VET practitioners and experts, state and territory governments and community members.

Given the focus in this paper on employer engagement, extracts from the submissions by employer groups are presented here:

Australian Chamber of Commerce and Industry²

The Australian Chamber sees considerable value in establishing a body similar to the Reframing the Future to promote change and improvement in professional practice in VET in Australia. The guiding objectives of such a body would be:

- driving cultural change and professional practice in VET
- commissioning, conducting and applying research on best practice in VET
- developing professional development programs for VET staff, including going beyond pedagogical practices and looking at internal compliance and governance for RTOS.

The Australian Chamber [supports] an industry recognition "star rating" system for providers, which requires examination now that the new VET provider standards have been adopted. Such a system requires government support in its establishment but could be substantial self-sufficient in the long run. More information about the star rating approach is contained below.

² <<https://submissions.education.gov.au/Forms/Quality-of-Assessment-in-VET-submissions/Documents/Australian%20Chamber%20of%20Commerce%20and%20Industry.pdf>>

Communities of practice that link these work-based vocational skills specialists with RTOs and provide a means of assessment moderation and advice on teaching and learning practices relevant to the vocational skills outcome.

Independent validation across all of VET for every learner would be costly and difficult to manage. As a baseline, there should be confidence that RTOs are delivering training and assessment that meets industry standards and complies with the national regulatory standards. Where a qualification links to a high-risk occupation or a regulated or licensed occupation, there is often already an external assessment process in place OR a professional program that sees the learner working in a supervised environment until there is confidence that the learner has demonstrated the range of skills required by the occupation effectively. The Australian Chamber supports both of the above models, where the industry sectors and the relevant regulator work together to ensure the quality of outcome.

Where there is a capstone unit in place, there is a good opportunity for the appropriate industry association or employer to play a role in overseeing the quality of output from RTOs. It is often cost and time prohibitive for an employer or industry association to have input into all aspects of the assessment process for each learner, however, with a capstone assessment unit in place, RTOs could draw on expertise with an employer or industry association to provide additional advice or oversight on the final assessment and an industry signoff on the competence of the learner. *Given the resourcing requirements needed to have skilled assessors with current vocational skills within an industry association or employer, it would be necessary for the RTO or perhaps government or the regulator to provide funding to the employer or industry association to support to assessment process.*

The Australian Chamber would support the establishment of a system of industry focussed moderation that would be overseen or administered by ASQA and support ASQA auditors in making value-based judgements on assessment outcomes and the veracity of evidence presented by RTOs. Under this model, ASQA would establish a Panel of Expert Assessors, based on the advice of industry and working in conjunction with them.

In ASQA's submission to the discussion paper, it presented a different view from that made in this last point, namely:

Any system involving assessment outside of the RTO will add considerable cost and all things considered, ASQA believes that assessment being undertaken by the RTO produces the most cost-effective results.³

Australian Industry Group (AiG)⁴

A key principle emphasised in the AiG was that the training and assessment process sits together in a competency-based system.

The introduction of new local level external assessments would require heavy resource commitments for the system without necessarily adding value, and with a risk of increasing costs for employers.

The key factor in establishing an independent validation system (whether internal or external) is to regard the involvement as a review to check quality, and not involvement in every assessment.

Validating quality of assessment involves a check of 'observable behaviours' in 'different contexts and

³ <<https://submissions.education.gov.au/Forms/Quality-of-Assessment-in-VET-submissions/Documents/Australian%20Skills%20Quality%20Authority.pdf>>

⁴ <<https://submissions.education.gov.au/Forms/Quality-of-Assessment-in-VET-submissions/Documents/The%20Australian%20Industry%20Group.pdf>>

environments'. Such a resource intensive activity would be costly to establish for all assessments. Under good quality application of the current standards employers are consulted at the local level by RTOs anyway, in order to determine appropriate assessment and competence.

With quality training package development, including industry representation and associated assessment guidelines tools, the assessment parameters for high-risk qualifications should be sufficiently rigorous.

A system of reassessment of an industry-agreed set of competencies before a student is issued with a qualification would undermine a key component of the VET system and the central involvement of industry in the development of industry endorsed standards.

This lack of appetite for a radical departure from the existing system may have influenced the TAWG findings from this exercise. These are quoted here at length because they encapsulate the recurring issues about independent validation.

The group made seven recommendations to the minister in May 2016, including:

5. Commission work to develop a mechanism in the training product development process to allow industry to propose, subject to demonstrated industry and/or occupational regulator support, specific independent validation of assessment requirements for the consideration of the Australian Industry and Skills Committee.

Explaining the rationale for this recommendation the TAWG said:

The purpose of this recommendation is to ensure there are appropriate mechanisms and frameworks in place as part of the training package development process so that, *should there be sufficient industry or occupational regulator support for independent validation of assessment* [author's emphasis], there is scope to include such a requirement in training packages and a clear understanding of what this means and how this would occur.

The TAWG suggested a way to implement its recommendation:

The AISC would consider any case put forward by industry reference committees for proposed independent validation of assessment and the evidence base that underpinned it. The case would need to specify the requirements for how independent validation of assessment would occur. If approved, *the relevant skills service organisation would receive funding to undertake this work under its contracted agreement* [author's emphasis]. AISC approval would be dependent on priorities and regulatory risk. As with the regular development of training packages, stakeholder consultation and support would be required.

However, it also noted that:

the Working Group was not in complete agreement as to whether this model of independent validation of assessment was either necessary or appropriate and some members were concerned about regulatory impost and cost. There were also concerns that there is currently no appropriate framework or mechanism to assist with determining appropriate independent validation methods or determining risk. It was agreed that work be commissioned to explore this further.

As part of the work commissioned, consideration could be given to both independent validation of assessment tools and independent validation of assessment outcomes. Commissioned work could also consider a framework to identify specific criteria or risk factors (TAWG 2016, p.6).

Reporting on the views offered in submissions, the TAWG said that:

The majority of respondents indicated that industry endorsed, externally administered tests are not viable as this undermines competency-based training and would rely on a level of industry engagement that is often difficult to achieve [author's emphasis]. It was noted by some respondents that externally administered tests are important and are already in place in some circumstances for licencing purposes or high-risk qualifications.

It was also noted the general use of externally administered tests may risk undermining public confidence in the design of VET qualifications, the Standards for RTOs, the effectiveness of regulators and the assessment practices of all RTOs. A benefit noted by some respondents was that it provides a level of consistency for industry, but this is at a cost.

It was noted that employers generally do not have the training and assessment experience required to contribute effectively to the validation of assessment and that it is a resource-intensive activity.

Risk factors for consideration identified in submissions included public safety, learner requirements, low completion rates, mode of delivery and industry needs.

The Working Group considered the improvement of independent validation of assessment by providing ASQA with a mechanism to target repeated RTO non-compliance against assessment requirements. It was determined by the Working Group that this would be better addressed in the development of training packages and that any further requirements for independent validation of assessment would be overly burdensome and costly for both RTOs and industry, if industry involvement was mandated. (TAWG 2016, pp.6-7).

Four of the other recommendations addressed the need to strengthen the skills of trainers and assessors to ensure VET practitioners are properly prepared to undertake valid assessments (p.4). The TAWG also noted the strong support from the sector to clarify terminology such as 'job ready', 'competent' and 'proficient' and ensure employer and student expectations are realistic and consistent with the training products (p.9).

In light of subsequent recommendations by Joyce (see below), it is relevant to record ASQA's responses to the discussion paper (ASQA 2016):

ASQA notes that it is important to unpack what is meant by the term 'industry' (for example, is it meant to mean associations or employers?). ASQA does not believe that industry associations or employers are well placed to be the key arbiters in any validation of assessment process. They can make a valuable contribution, providing the key part of the validation is undertaken by people who are qualified to be able to check that the assessment process has led to valid assessment outcomes in accordance with the RTO Standards.

ASQA is strongly of the view that the most critical role for industry (i.e. employers) is involvement in the proper identification of the skills needed for today's jobs so that training packages can be designed (or redesigned) to fulfil their core purpose.

Any system involving assessment outside of the RTO will add considerable cost and all things considered, ASQA believes that assessment being undertaken by the RTO produces the most cost-effective results (providing poor performing RTOs are dealt with).

... the capacity of ASQA to regulate such arrangements would need review. In addition, consideration would need to be given as to how the extra cost would be funded.

In summary this investigation into independent validation suggested:

- the need to make greater use of existing mechanisms available in Skills Service Organisations to emphasise assessment in training package development (albeit with better use of plain English, noted under recommendation 7 (p.9)) and not the regulator
- lack of consensus on the need or capacity for industry to be involved in the validation of assessment because of the time, money and expertise this requires
- any type of external validation should be determined by risk factors
- external tests are not universally compatible with the competency-based system
- trainer and assessor skills in assessment are vital.

2017–2018

The Victorian Skills Commissioner established a taskforce to examine potential opportunities and current barriers relating to the uptake of apprenticeships and traineeships across industries in Victoria. In October 2017, the commissioner provided advice to the Minister for Training and Skills. The *Rebalance and Relaunch* report found, while stakeholders in the apprenticeship system agreed it needed some enhancement, they stressed the importance of consistency and transparency from government. They also advised that new models should not be introduced without first ensuring that they are a product of genuine industry demand, and their effectiveness should be tested through pilots to build industry, student and community confidence. The taskforce also heard frequent concerns about the quality of delivery and assessment for apprenticeships and traineeships, with some employers saying they had to implement their own workplace-based approaches for the verification of competency. Others cited electrical and plumbing licensing requirements as effective mechanisms for ensuring quality of outcomes through the independent assessment of competency (Office of Victorian Skills Commissioner 2017, pp.4–6).

These views led the taskforce to recommend trials of independent assessment for apprenticeships in key occupations, with a view to ensuring that apprentices did not graduate without the essential foundation, technical and employability skills that employers require. In making this and other recommendations, the taskforce emphasised the interdependence of the three central themes in the approach it put forward:

Consistent, quality outcomes are needed to encourage employer investment and shift public perceptions of apprenticeships and traineeships. Industry leadership and employer commitment are needed to guide quality improvements. A widespread understanding of the value of apprenticeships and traineeships is needed to build collaboration and a sense of shared responsibility for co-investment (Office of Victorian Skills Commissioner 2017, p.6).

In 2018 the Victorian Government responded by introducing independent assessment pilots, along with the reintroduction of trade papers and new learning materials in its four-year \$43.8 million quality apprenticeships program. VETASSESS, an independent assessing authority, was engaged to design, develop, and conduct the assessment of the initial eight occupations. These are underway, although disrupted by COVID-19.

At the national level in 2017, the Assistant Minister for Vocational Education and Skills Karen Andrews commissioned a review of the *National Vocational Education and Training Regulator Act 2011* (NVETR Act) and its legislative framework. The Braithwaite Review (2018, p.66) concluded that:

quality training depends on teacher quality, [that] professional teachers and trainers, in effect, regulate the quality of delivery and assessment at the coalface.

This led to the following recommendations (pp.67-72) that:

- the legislative framework be revised to require RTOs to assess the quality of its teaching workforce, develop teacher quality improvement actions and annually report their progress to the regulator
- the Training and Education Training Package be reviewed with the purpose of creating a career path for teaching excellence
- a role of Master Assessor be created to help raise the standards of teaching and training excellence and professionalism in the sector.

In response, the Australian Government (2018) accepted the first two recommendations and asked its Department of Education and Training to determine the feasibility of implementing them (quoted in Harris 2020).

2018–2019

In November 2018, the Australian Government commissioned a former New Zealand Tertiary Education, Skills and Employment minister, Steven Joyce, to examine how the VET system could better deliver for Australian jobseekers and employers now and into the future. The terms of reference included considering whether specific trials should be undertaken to test innovative approaches likely to deliver better outcomes, while also stating the review should have regard to the scope and outcomes from any previous or forthcoming reviews, consultations to date, and inputs made by industry and peak groups.

The report, *Strengthening Skills*, was delivered in March 2019. Quoting the Training and Assessment Working Group (see above), it stated steps were needed to improve the quality of assessment. It noted:

Some industries overcome assessment concerns through the independent validation of a person's competencies at the end of the course. This can be through a capstone assessment or through independent licensing requirements, such as the electrical and plumbing licensing systems ... The Review also found that the best international systems have end-of-program independent assessment.

The use of benchmark hours will go a long way to improving the quality of delivery of VET⁵. A complement to this step is to examine rolling out independent validation of assessment more widely. The widespread use of independent assessment would also assist with recognition of prior learning. The Commonwealth should work with the Victorian Government and other States and Territories to expand the pilot and examine options to build this into the VET system. The National Skills Commission...would advise on appropriate funding arrangements for assessors (Commonwealth of Australia 2019, p.47).

The report considered that independent validation of assessment also had an important role in regulating the system:

...verifying assessment falls within the broad remit of ASQA's responsibilities. It is recommended that the Government confirm whether independent validation of assessment falls within ASQA's remit and, if not, that this power is granted to ASQA as a matter of priority. ASQA should use this power when it has identified a provider with a sufficient number of red flags during an audit to warrant further

5 The Australian Qualifications Framework (AQF) Review had a different view saying (p.70) 'the Expert Review of Australia's Vocational Education and Training System recommended specifying benchmark hours for VET qualifications. If implemented, this may not provide additional benefit regarding credit points if the benchmark hours only specify the amount of RTO training, not the notional student learning. Benchmark hours should include student learning to provide accurate credit point values.'

investigation. While often costly, re-assessment is the strongest tool for determining whether qualifications are being delivered correctly; it is used regularly in other jurisdictions once a threshold of concern about a provider is reached.

In a future state, independent validation of assessment could be performed through the Skills Organisations (SOs), described later in the report. This would bring industry strongly into the assessment process (Commonwealth of Australia 2019, p.48).

The Australian Government announced an extensive review of the Australian Qualifications Framework (AQF) in the 2017–18 budget to ensure that it continued to meet the needs of students, employers, education providers and the wider community. The review panel, chaired by Peter Noonan, released its final report in October 2019. While not specifically directed at assessment, the fact that the AQF is referenced in industrial awards and professional standards, its findings do impinge on the certification of learning. While the government accepted, in December 2019, all the recommendations of the review in relation to higher education, those relating to vocational education, were to be discussed with state and territory governments.

In terms of independent validation, the review's greater linkage of knowledge, skills and application in describing learning outcomes was designed so that prospective employers can know if graduates are able to adapt and apply what they have learned in an employment context (Expert Panel 2019, p.29). This, no doubt, will apply more and more to higher education qualifications, and micro-credentials, as well as to VET. Further, by expressing all learning outcomes in the same format this could encourage credit transfer and signal the equivalence in value of learning from all sectors in the Australian education and training system (Expert Panel 2019, p.70).

2020

On 1 March 2020, the Council of Australian Governments released a draft VET reform roadmap, which aimed to bring the results of various VET reviews together into a reform path for the sector. The same month, COVID-19 forced a nationwide lockdown and subsequent measures to try to cope with the labour market consequences of the pandemic.

The draft roadmap set out for consideration in its first year, a new industry-endorsed system for independent, validated moderated and/or graded assessment, followed in the second phase by trials of alternative assessment models. One measure of the success of these trials 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).

The roadmap envisaged that this new system for assessment would be endorsed and invested in by industry, with various models devised and their application across a range of industries and modes of study trialled (Skills Senior Officials' Network 2020 p.6).

Also in March, the Department of Education, Skills and Employment released the Rapid Review of the ASQA's regulatory practices and processes. The review mentioned the Joyce review but not the specific recommendation that:

the Government confirm whether independent validation of assessment falls within ASQA's remit and, if not, that this power is granted to ASQA as a matter of priority. ASQA should use this power (Commonwealth of Australia 2019, p.48).

The only mention of assessment validation is in a footnote that refers to the units of competency in the TAE40116 Certificate IV in Training and Assessment auditors are required to have (mpconsulting 2020, p.60). The recommendation made in the rapid review is that:

it is imperative for auditors to have a thorough understanding of good regulatory practice and ASQA's expectations regarding how providers demonstrate compliance. ASQA staff require guidance on how to consistently navigate the environment, how to review quality systems (rather than focusing on discrete or prescriptive requirements), how to appropriately sample evidence and how to consistently interpret key elements of the standards (mpconsulting 2020, p.61).

While it was suggested that auditors be trained in assessment methodology, this would appear to be as part of being able to judge that RTOs are meeting the required standards rather than including any independent validation of assessments themselves.

In responding to the Rapid Review, the ASQA website says its 'goal is to move from input and compliance controls to a focus on self-assurance and excellence in training outcomes...With ASQA's reform occurring in tandem with wider VET reform, our work will be ongoing over the next few years.'
(<<https://www.asqa.gov.au/working-together>>).

Another interim report appeared in May 2020: the Productivity Commission's review of the National Agreement for Skills and Workforce Development (NASWD), which had been agreed to by COAG in 2012 and which had set aside funds for the development and piloting of independent validation of RTO assessment practices.

The Productivity Commission found only limited information about the pilots, including some positive response from employers in the South Australian trials. It quoted the Australian Chamber of Commerce and Industry '...generally, employers' satisfaction with VET delivery has fallen, but still stays overwhelmingly positive', noting too that while the performance indicator in the system of declining employer satisfaction rates is seen by some as evidence of systemic quality problems, 'this indicator does not shed light on the causes of employer dissatisfaction'. It did record familiar concerns about unreasonably short courses and inadequate assessment arrangements (Australian Productivity Commission 2020, pp.94-95).

While acknowledging the pilots for 'independent assessment' models foreshadowed in the Joyce review and the draft road map, the Productivity Commission suggested that the explosion in online learning, led by Mass Open Online Courses and more recently required by COVID-19 restrictions on face-to-face training, pointed to a more radical approach to certification – the unbundling of assessment from teaching:

The seeming Achilles heel of such models of training is accreditation. However, accreditation and knowledge provision could be unbundled – as is the case for drivers' licenses. The Commission saw considerable scope for such an approach in its assessment of Australia's higher education system, and it may have equal, if not more application in VET. Governments' role would be to develop reputable certification models where these were not already available. (Businesses sometimes already provide quality certification, as in Microsoft's exams for certifying IT skills relevant to its platforms.)
(Australia Productivity Commission 2020, p.194)

A new pilot emerging from the Joyce review, is of Skills Organisations in human services care, digital technologies and mining, which consist exclusively of industry employers. These are to test 'end-to-end' training solutions and enhance the role and leadership of industry in the skills pipeline. They will look into streamlining training package development and updating and implementing processes to be faster, simpler and more responsive to the needs of industry.

The pilots are to undertake scalable, value-for-money activities including:

- development of nationally recognised training
- new methods of assessment
- developing standards for industry (i.e. employers) to endorse high quality RTOs. (See <https://www.dese.gov.au/skills-organisations>)

The terms of reference for the Digital Skills Organisation, which was legally established on 19 June 2020, include the following elements required in the pilot's design:

Develop stronger relationships with registered training organisations (RTOs) to improve delivery of VET qualifications and enhance outcomes, for example by:

- translating training materials into 'industry language'
- better aligning training and assessment with the expectations of employers
- facilitating work placements for learners.

Increase confidence in the quality of VET graduates, such as through:

- independent assessment
- capstone testing
- external validation of RTO assessment (Digital Technology Skills Organisation Pilot Steering Group and Working Group 2020, p.5).

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