



Australian Education Union

Response to the Quality of assessment in vocational education and training discussion paper

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INTRODUCTION

The Australian Education Union makes this submission in response to the *Quality of assessment in vocational education and training: discussion paper*.

The Australian Education Union represents more than 190,000 members employed in government schools and public early childhood work locations, in TAFE and other public institutions of vocational education, in Adult Multicultural or Migrant Education Service centres and in Disability Services centres as teachers, school leaders, and education assistance and support workers.

In recent decades, TAFE has been gradually undermined by funding and policy neglect by successive State, Territory and Commonwealth governments, yet TAFE remains the dominant provider of quality Vocational Education and Training with a highly skilled and qualified workforce. Unlike the broader Vocational Education and Training system which, in recent times, has been wracked by financial scandals, daily stories of abuse of vulnerable learners and training delivery that is of poor quality or non-existent, TAFE is valued by the Australian community for its institutional capability and the quality of its teaching workforce. Quality in assessment in vocational education and training is predicated on supporting this workforce.

Poor quality assessment in VET is not an isolated issue. It is one aspect of a systemic collapse in the quality, sustainability and credibility of the VET system as a direct result of poorly conceived experiments with VET marketisation. Poor quality assessment is one feature of a government constructed VET market characterised by low entry barriers and access to large sums of tax payers money, of which the well documented failures of the VET FEE-HELP scheme are just one example.

Quality Assessment

Assessment and training are intricately linked in high quality education, and perhaps no more so than in vocational education and competency based training where for students, the opportunity to provide evidence of competence or skills acquired is also an opportunity to feed back problems and develop new skills. The separation of education, training and assessment is an artificial construct developed for systemic or bureaucratic reasons, in order to try to make VET less like a complex human interaction and application and more like a supply chain that lends itself more easily to marketisation. In a quality educational environment, education, training and assessment cannot be separated – assessment is continuous throughout the education process, as is education throughout the assessment process.

Teachers in TAFE have traditionally been regarded highly for their dual-professionalism, that is, their skills in specific industries and their skills as educationalists. In its earliest stages, many TAFE teachers who came into the sector with industry skills and experience had access to teacher training on and off the job, supported by the institution they worked for and by governments.

The Certificate IV in TAE was originally developed as a minimum qualification for workplace trainers and assessors who train and assess against national units of competency as part of a broader role within a specific enterprise. It was never intended, nor is it suitable, to be the default qualification to underpin the integrity and quality of the VET system. A

reworked TAE will not rebuild public and industry trust in VET and TAFE. It says much about the current federal government's low aspirations for VET and TAFE, that tinkering with the minimum qualifications required for the least complex part of the overall VET architecture substitutes for a debate on "quality" education and training.

The acceptance that the Certificate IV in TAE is the default qualification in the VET system was given energy by the release of the Productivity Commission's Research Report of the VET workforce in 2011. The Productivity Commission erroneously reported that 40 per cent of TAFE teachers were unqualified. The Commission came to this figure by being selective and tardy in its use of data. It eschewed data derived from a DEEWR survey in 2010 which estimated that 90 per cent of trainers and assessors in TAFE held teaching qualifications because it considered the figures to be overestimates on the basis that DEEWR had under-sampled non-permanent employees. It then went on to use TAFE administrative data from an anonymous jurisdiction which estimated only 60 per cent of TAFE trainers and assessors had a Certificate IV TAA or higher, implying, according to the Commission that 40 per cent of trainers and assessors in the whole public TAFE sector do not have even the Certificate IV.

This data has been challenged by the unnamed state, on the basis that the Productivity Commission has seriously misrepresented and misinterpreted the information it was sent. More importantly, every state and territory in Australia had evidence available contradicting this finding. The AEU's 2010 survey of 2,800 of its TAFE teaching members showed that 99 per cent held teaching qualifications at or higher than a Certificate IV TAA (78 per cent held teaching qualifications higher than a Certificate IV). This is evidence that was available to the Productivity Commission, but which it chose not to access.

History of the TAE

The inadequacy of the TAE to underpin quality and integrity within a heavily marketised VET system has been identified almost since its inception. The first version of the current Certificate IV in Training and Assessment (TAE40110) was introduced into the sector in October 1998 as the Certificate IV in Assessment and Workplace Training.

- In 2008, the NSW Vocational Education and Training Board conducted a strategic audit of this Certificate IV in Training and Assessment as a result of misleading advertising of the duration of delivery, insufficient sub-contracting arrangements and poor delivery by interstate training organisations operating in New South Wales.
- The 2010 *Quality of Teaching in VET* report commissioned by the Australian College of Educators and conducted by Melbourne University's LH Martin Institute recommended that RTOs delivering the Certificate IV TAE be subject to higher quality audit conditions to address perceived problems with delivery.
- In 2011, the Productivity Commission noted concerns about the quality of the delivery of the Certificate IV TAE including inappropriately short delivery timeframes, inappropriate RPL processes and a lack of understanding of the qualification.
- In 2012, the NCVER research report, *Assessment issues in VET: minimising the level of risk*, singled out as a significant risk, the capacity of the holders of this qualification to consistently demonstrate the skills required to deliver training and assessment in the VET sector.
- In 2013, the National Skills Standards Council recommended even greater regulation and external validation of the TAE on the basis that this qualification was still considered to be high risk.

- In 2014, the Department of Industry found that about one-third of the RTOs covered by audit delivered the qualification in ten days or less with the a resultant likelihood of issuing invalid TAE Certificate IVs. Further that this was being driven by ‘competitive pressures to offer qualifications in a short timeframe and at a low cost’¹.

The 2016 *Quality of Assessment in VET: discussion paper* asks similar questions regarding the TAE as the above reports and is likely to return similar findings without a broader systemic view of quality education, training and assessment in VET.

It is ironic that a paper that expresses deep concern about the potential impacts on employers, industry and the community of “incompetent” VET graduates, seeks to undermine the high level of skills that currently form the basis of the TAFE system in an ongoing attempt to build a new VET system using a low skilled, low paid workforce.

Qualifications and professional development required to ensure quality assessment in VET

The AEU argues for a sustained re-investment in teaching qualifications, and an approach which draws on the experience and expertise of those in the sector and in industry to provide education in a staged and manageable way to teachers once they have entered TAFE with their industry qualifications and experience. We have argued for ongoing professional development, and for genuine programs in industry, developed in close cooperation with industry itself to maintain and build the specialist industry knowledge which TAFE teachers are so well known for. Our arguments are based on an understanding that just as it requires skills and knowledge in specific industry areas, so TAFE teaching requires teaching expertise – the capacity to develop teaching strategies, based on knowledge of individuals learning styles, on pedagogy, on what impact disadvantage has on individuals, on how hard it is to learn if there is no literacy and numeracy. TAFE teaching is about industry skills and knowledge, but it is also about understanding students, and providing encouragement and resources and knowledge beyond the just in time demands of resource-poor training. We recommend that State, Territory and Federal governments resource and support the development of high quality teacher qualifications in TAFE and VET, based on a three phased initial, consolidating and advanced approach. Such an approach recognises the dynamic nature of the contemporary vocational education environment, where qualifications for teaching are often acquired following initial employment, and where the importance of both education and vocation are acknowledged.

- a) The **first phase** should be a specifically designed entry-level TAFE teaching qualification (to at least AQF Level 4) for the overwhelming number of teachers working in institutional environments. It would feature:
 - an initial teacher education program for institutionally based TAFE teaching with an initiation/intensive “how to teach” unit focussed specifically on the practice of teaching face-to-face in different settings including competency based education;
 - a supervised teaching practicum that melds off-the-job and on-the-job learning;
 - introduction to theories and the related practice of vocational teaching, learning, assessment and evaluative reflection;
 - current and emerging instructional TAFE teaching environment;

¹ Zoellner, Don Ignoring those very inconvenient canaries in the coal mine, *The Australian TAFE Teacher*, Autumn 2016 Vol 50/1 (forthcoming)

- mentoring from experienced colleagues.
- b) The middle phase should have the following features:
- consolidating advanced and innovative teaching and learning practice;
 - theories of high level teaching, learning and assessment;
 - specialist units dealing either with industry/subject knowledge, or context (online, distance, workplace).
- c) The third phase should have the following features:
- specialist learner centred teaching and learning practice;
 - advanced theories of expansive teaching, learning and assessment;
 - specialist units dealing either with industry/subject knowledge, or context (online, distance, workplace).

Professional Association

The TAFE sector has a professional association. It is the Australian Education Union. Industrial and professional issues in an “industry” like education are inseparable. Workload regulation is about the time to teach and teach well, to prepare, to assess, to do all the things essential to teachers’ work. Job security is about the time to plan a program of activity, to invest professionally in yourself, the institution and students – it is about planning always for the future that students must face. Incremental scales should be about linking advancement in the profession to higher qualifications and also to the recognition of skills and experience.

The AEU supports the development of a body to regulate the accreditation of teacher qualifications and registration of TAFE teachers. In the schools sector in Australia, and in education sectors in the UK, registration is seen as an important way to define and determine educational quality, and to build professionalism. The development, with the profession, of mechanisms for registering teachers on the basis of the qualifications required for vocational teaching will provide the capability to allow vocational teachers to work in secondary and higher education contexts, making notions of pathways more tangible in pedagogical terms. In addition, it will critically ensure the essential parity of esteem that is indispensable to the acceptance of vocational educators within domains of secondary and higher education.

Any registration must be predicated on the standards of high level practice founded in entry and mid level qualifications and affirmed in extensive practice. Moreover, such accreditation of teachers should embody an explicit and robust requirement for continuing professional development.

While the development of capability frameworks can potentially underpin new qualifications to service the TAFE and VET sectors, these are of little value in systems where the pressure to make a profit mitigates against employment of highly capable staff and funding of their ongoing professional development. Analysing the skills of a VET professional is not a substitute for funding the acquisition of these skills or requiring evidence of their existence in order to access public moneys.

Conclusion

The emerging tertiary education system will require robust pathways between vocational and higher education, whilst at the same time producing the necessary vocational capability for those facing ever more complex work. There is likely to be a redefinition of the complex and prescriptive Training Package system toward standards of occupational expectation that will require higher levels of pedagogical interpretation by teachers. There is a growing expectation shared by industry, students and TAFE institutions of the need for more sophisticated and flexible forms of delivery for vocational learning. This environment will require increasingly skilled and qualified VET practitioners.

Quality assessment practices are one part of the critical vocational skills required for a transforming economy. The advent, in the last decade of the minimalist Certificate IV level qualification has lead to a declining number of TAFE teachers having access to high level vocational teacher education programs. Shrinking TAFE budgets and failed marketisation policies have lead to dramatically decreased investment in professional development of the TAFE teaching workforce. Quality assessment in TAFE and VET and robust and trusted vocational qualifications cannot be built while this downward trajectory of investment and regulation continues.

Recommendations

The AEU endorses the view of the ACTU that addressing poor quality assessment across the VET system is of little value if it is not accompanied by policies to address the systemic undermining of quality VET and to rebuild high quality public TAFE institutes.

We therefore recommend:

- The introduction of a 30 per cent cap on the amount of VET funding that is contestable, and the allocation of a guaranteed minimum 70 per cent of government funding to TAFE. This would be a first step towards recognising and supporting the critical role of TAFE and provide a brake on the unsustainable and counter-productive size and growth of the private training market.
- The suspension of the operation of VET FEE HELP scheme pending a thorough review.
- The suspension of the registration of any new private providers.
- The development and implementation of stronger regulation and monitoring of all private training colleges.
- The development of high quality teacher qualifications in TAFE and VET, based on a three phased initial, consolidating and advanced approach as outlined in this, and earlier AEU submissions. Such an approach recognises the dynamic nature of the contemporary vocational education environment, where qualifications for teaching are often acquired following initial employment, and where the importance of both education and vocation are acknowledged.