

RESOURCE C



Thirty assessment challenges: overcoming the legacy of our own assessment experiences

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Assessment in VET is completely different to assessment in schools and universities. There are different rules, different principles, different strategies and different quality requirements. These differences are not always fully understood and when we are under pressure it is easy to return to the old familiar assessment strategies of our own schooling experience - strategies that are still in use in the non-VET sectors.

This paper considers thirty challenges to quality competency-based assessment in VET, and discusses how they arise, why they must be overcome, and how we can keep on track. To help keep true to VET competency-based assessment, thirty assessment errors ... you might even call them assessment issues ... are discussed in this handout.

Original Challenges

The first set of issues arise from misunderstanding the concept of a competency, both as a fundamental benchmark for performance, and in terms of its form, function and meaning.

1. Failing to recognise that competency-based assessment is based upon a ***fundamentally different paradigm*** to the long-standing normative numerical paradigm that underpins most education sectors. We all share the experience of those traditional approaches, so to adhere to the new paradigm we must be willing to set aside our predisposition for the old. Inevitably to justify persistence with the new paradigm, we need to reflect upon the inadequacies of the old as a basis for judgement in VET. The dangers of failing to make this change can be the repackaging of traditional approaches as 'competency based' assessment or the creation of hybrid approaches that result in a burdensome, confusing and unproductive amalgam that doesn't achieve the purpose of either approach.
2. Failing to understand the ***fundamental concept of VET competency*** as a description of the skills and knowledge that a person needs to apply in the workplace through the performance of tasks, roles or jobs, for productive, safe and quality outcomes that enhance the business, industry and community. This demands that those engaged in competency-based assessment are industry aware and industry engaged (Outcome Standards 1.2 and 3.3). The opportunity this offers is the ability to make a credible assessment of the workplace readiness of individuals for the benefit of businesses, industry and the community.

3. Failing to **identify all the mandatory or required components** of units of competency in the initial planning for assessment (and training). The unit of competency is a description of what it means to be competent. The mandatory requirements include the elements of competency (and their performance criteria), the performance evidence, the knowledge evidence, and may include foundation skills. There may also be mandatory pre-requisite units. Only when you have seen a person exhibit all the unit's mandatory requirements, are you able to declare that they are competent. [Not just the assessment requirements, not just the unit description, not just 50% or even 80%]
4. Treating **performance criteria as separate entities** rather than as collectives in the planning of assessment. This problem reflects a fundamental misunderstanding of the nature of an element of competency. An element is defined by the whole collection of performance criteria seen together in one event. The achievement of an element of competency cannot be seen in the gradual accumulation of performance criteria. This means that when we seek to observe an element of competency, we must devise an activity that demonstrates all its performance criteria. It also follows that if one or more performance criteria are not observed in the assessment of an element of competency, supplementary assessment must require the performance of all the performance criteria for that element, not just those that were missing. The assessment of performance criteria together is mandatory, so when planning assessment tools to observe elements each tool must always address all the performance criteria of each target element.

Observance Challenges

The next set of issues relate to how we observe competence and how we gather evidence to demonstrate that a person has achieved competence. These issues relate primarily to the Rules of Evidence listed in Outcome Standard 1.4 of the 2025 Standards.

5. Failing to **gather evidence for all the mandatory unit requirements** (see 3). Taken together, your evidence-gathering tools must provide the learner with an opportunity to demonstrate all mandatory unit requirements.
6. Failing to utilise appropriate **evidence gathering strategies**, by substituting knowledge assessments for skill assessments and *vice versa*. Knowledge is not a surrogate for skills. You can have the knowledge but not be able to perform the task, and you can perform the task but not have the knowledge. Competency requires the integration of both the knowledge and the skills, and each must be specifically evidenced with appropriate assessment strategies. You assess skills through observing performance, you assess knowledge by asking questions. Elements and their performance criteria should not be mapped to knowledge tests, and knowledge evidence should not be mapped to observation checklists.
7. Failing to make **simulated skills assessment** sufficiently like the workplace. Assessors can become disconnected with industry and begin to see skills separate/disconnected to the workplace context. This can be avoided by consultation and engagement with industry (Outcome Standard 1.2), maintaining an understanding of how the competency

to be assessed actually works in the workplace, ensuring that workplace and regulatory requirements are understood and met, and ensuring that simulations reflect all four dimensions of competency [Tasks skills, task management skills, contingency management skills, and workplace environment skills.]

8. Not adequately ***selecting, preparing and supporting third-party observers*** who are gathering evidence on your behalf in the workplace. The selection of third-party observers needs to take account of proximity to the candidate, vocational expertise and diligence as an observer. Their preparation would include contextualising the language of the checklist (particularly the language of performance criteria) so that the terminology is in their workplace vernacular. Support should be provided in the form of checklists, communication channels and validation activities.
9. Failing to gather ***sufficient evidence*** of competency by utilising a one-off assessment of skills. The consistency and transfer requirements of the definition of competency, and the sufficiency and reliability requirements of Outcome Standard 1.4 usually means that two distinct observations of skills are needed. RTOs may use the same assessment tools but should differ in some significant respects, for example different times, different contexts, different observers and/or different materials. This not only provides corroborative evidence (supporting validity and reliability, Outcome Standard 1.4), it also encourages and demonstrates transfer of learning and long-term retention.
10. Gathering ***too much evidence*** by assessing candidates on Employability Skills, the Dimensions of Competency or aspects not required by the unit. *Employability Skills* relate to entire qualifications and although they are facilitated by the acquisition of individual units of competency they do not have any formal or prescribed relationship with units. Other additives might include workplace/enterprise-specific criteria, or extras valued by the assessor but not required by the unit. If additional information is required for non-unit purposes (for regulatory authorities, year 12 certificates, employer requirements) they can be included in the evidence-gathering process but must be timed so as not to impact upon a person's ability to demonstrate competence, and must not be included in the judgement of competency.
11. ***Customising assessments*** to a particular context or student group by omitting mandatory components such as an element, a performance criterion, an item of knowledge or a performance requirement. These actions invalidate the assessment process and lead to unsafe judgements. Under no circumstances can any mandatory requirement be ignored, even to reflect local regulatory requirements or practices. The units of competency reflect national standards and derive their credibility from consistent application. Local customisation could create serious risks.
12. Failing to ***contextualise*** the terminology and syntax of the unit or related checklists to ensure that learners, third-party observers and other stakeholders understand precisely what is required. Contextualisation does not change the meaning of the requirement, it simply re-expresses it in a form that will be understood by the reader. This does not allow for assessment in a language other than English (unless specified on the Certificate).

13. Failing to **respond to individual needs** by contextualisation (see 12) or by **reasonable adjustment** to allow a person with a defined disability the opportunity to demonstrate their competency. The key word here is 'reasonable' as any adjustment must preserve the integrity of the unit, must not send the RTO into liquidation/administration, must be accessible to the learner, must be replicable in the workplace, and must not interfere with the learning or assessment of other candidates.
14. Responding too much to individual needs by **making unreasonable adjustments**. This would include allowing non-English speaking students to be assessed through interpreters or providing excessive support. The key consideration is not to make adjustments that could not also be made in the workplace and that would invalidate the unit.
15. Failing to **inform learners of assessment strategies and criteria**. One of the key attributes of a competency-based approach is 'transparency', that the learner is provided with a clear statement of what they are expected to demonstrate (a contextualised restatement of the mandatory requirements of the unit/s) before commencement, before learning and before each assessment event.
16. **Misapplication of AQF levels to units of competency**. Each unit has a fixed level of sophistication and the level of complexity for a unit of competency is determined by the statements in the unit itself. A unit of competency **is not** aligned to the AQF. Each element and its associated performance criteria will tell you what the competent person must be able to do. There are many instances in the VET sector where a unit of competency is included in a number of qualifications at different AQF levels. You must deliver and assess the unit as it is written. This applies whether you deliver a stand-alone unit, as part of a cluster in a skill set, or as part of a full qualification. To do otherwise compromises the Principles of Assessment and Rules of Evidence
17. Relying on **evidence that cannot be authenticated**. In other education sectors it is common for students to complete group activities, projects and assignments at home, and it has become more common to offer assessments on-line. The evidence derived from such activities cannot meet the Rule of Evidence of authenticity. Various strategies have been suggested to counter this deficiency including interviewing the students on the phone, but these too lack verifiable authenticity. At best these activities provide 'formative' assessment, they give some indication of a student's progress, but they do not provide the hard evidence required for certification. Evidence gathered on-line must be authenticated and may involve the re-assessment of a portion of the on-line evidence.
18. Treating **Recognition of Prior Learning (RPL)** as a soft assessment option - a way of shortcutting assessment. While it is correct to describe it as a way of shortcutting training, it is not a way of shortcutting assessment ... the assessment processes in RPL must comply with all aspects of Outcome Standards 1.4 and 1.6 as well as Training Package requirements. Historical evidence submitted as part of RPL is just one source

of evidence and needs to be validated by assessments that meet currency, authenticity, sufficiency and validity requirements.

19. Failing to provide a **competency basis for RPL** by inviting the learner to complete a 'whole of life' report (qualifications, training, work experience, life experiences etc.) as a substitute for valid competency-based evidence-gathering and judgement. The assessor is setting an impossible task of inferring competency achievement from information that is self-reported, and therefore the Rules of Evidence and the Principles of Assessment of reliability or validity cannot be met through this process. The 'whole of life' report might provide a basis to determine that RPL is a legitimate pathway to follow, but the assessment judgement must be based on evidence gathered by the RTO assessor that is compliant with Outcome Standard 1.4.
20. Using **many assessors** to compensate for sloppy evidence. There is a widespread view that bad assessment can be rectified through more assessors and more assessment. For example, where an assessment tool or process is found to be invalid it is simply lengthened, or where an observer's judgement is of uncertain credibility we are tempted to use more observers. The combined miss-observations of a wayward group of observers does not 'average out' the errors ... it simply compounds them. A single qualified and validated observer with a clear contextualised checklist can provide a far better quality report.

Judgement Challenges

Making the assessment judgement continues to be an area of concern. In most assessment texts and resources there is substantial discussion of the evidence-gathering process, but little is said about the judgement process. These are some of the problems that have been seen in decision-making.

21. **Raising the bar** by incorporating requirements that are not prescribed by the Training Package (e.g. neatness, punctuality, referencing etc.), but which you might reasonably believe will lift performance standards. These extras invalidate the assessment process and may create inequities. If they are highly valued these extra components can be assessed, but they must not influence the competency decision.
22. Failing to make **competency-based judgements**, resorting to marks or to some ill-defined process (such as a 'gut feeling') to decide what the evidence means and whether competency should be awarded. While most assessors now understand that evidence gathering must be competency-based, few seem to understand that the evidence gathered must then be interpreted to identify the competency requirement(s) it reveals and that only when sufficient evidence has been accumulated for each competency requirement can the final judgement that the learner is competent be made. Failure to make competency-based judgements also has a detrimental effect on learner feedback and on appeals.

Assessment is defined as 'the process of collecting evidence and making judgements on whether competency has been achieved ... as expressed in the relevant competency standards' this means that *evidence* must be collected relating to 'the relevant competency standards', and then *judgement* must be made relating to 'the relevant competency standards'. Assessors need to include a process that maps the evidence

obtained through assessments back onto the elements of competency (and their performance criteria), performance evidence and knowledge evidence so that a competency-based judgement can be made. Adopting this approach will clarify the judgement of the assessor as a key part of the assessment process, ensuring that the learner gets feedback related to specific unit requirements providing guidance to locate the learning resources that are also related to these criteria, and providing a clear basis for accountable decision-making.

23. Making ***holistic judgements for clustered units*** when clustering should only apply to the evidence-gathering part of the process. Clustered evidence-gathering is to be encouraged as it sets the performance in a more realistic workplace-like context. However, the evidence gathered must be mapped back to the separate units so that unit-by-unit judgements of competency can be made.
24. ***Converting performance into marks***. We know that performance cannot be meaningfully expressed as marks. Firstly, we have no idea what the mark value of any aspect of performance might have, and secondly since performance is multidimensional these 'marks' are not additive. The use of marks tempts us to treat the results as if they were uni-dimensional measures and applying statistical processes (such as the calculation of averages, ranks, percentages, standardisation, normalisation and aggregation) that would only apply to strong interval data. The use of marks also tempts us to accept a percentage-based pass mark and to make normative grading decisions which are invalid.
25. Failing to ***ensure pre-requisites have been assessed***. In all Training Packages any specified pre-requisites are mandatory. You cannot be judged to be competent in a unit unless you have been formally judged to be competent in its prerequisite. The evidence for the pre-requisite might be gathered at the same time, but the judgement of the pre-requisite must precede the judgement of its dependent unit.
26. Making the assessment ***judgement on the basis of assessment tasks*** rather than unit requirements. Assessors become distracted by the assessment tasks and fail to recognise that they are not the outcomes to be 'passed' or 'failed' ... they are merely the devices created to provide the learner/candidate with the opportunity to demonstrate some mandatory aspects of the unit of competency. The assessment summary should not list tasks completed but aspects of competency demonstrated, so that when all have been seen it is possible to make the safe call that the individual is truly competent.

Validation Challenges

27. Failing to ***analyse the mapping of the assessment tools*** against the Training Package to identify gaps in validity or sufficiency (Outcome Standard 1.4). While most assessors are aware of the need to map assessment tools and unit requirements, many are often unaware of the need to take correctional action when the mapping reveals serious gaps (aspects not assessed), redundancies (aspects that are over-assessed) or invalid inclusions (aspects that should not be assessed).

28. Failing to ***critically evaluate the assessment strategies, the use of evidence gathering tools and the assessment judgement processes*** for validity, reliability, fairness and flexibility and to revise and improve them (Outcome Standards 1.4 and 1.5). The Rules of Evidence and the Principles of Assessment provide a solid basis for quality assessment judgements. It is not uncommon to see these qualities ticked off in an assessment evaluation checklist, yet find non-compliances on one or more requirements when closely inspected.
29. Failing to ***follow-up graduates*** to verify that they are able to use the competencies they demonstrated, and that the use of these competencies has contributed to their workplace effectiveness and productivity. Although this is not mandatory, this is the acid test ... if they are not succeeding at work, perhaps your assessments were not a true reflection of the vocational competency or of current industry skills ... if they are succeeding, you've nailed it!

Capital Challenges

Finally, there is apathy ... why all this bother?

30. ***Not taking assessment seriously.*** The outcomes of assessment impact upon the learner's future career options and decisions, the well-being of fellow workers, the quality of services for clients and employers, the survival of businesses ... and even life and limb. These are not small matters to dismiss ... and there has been litigation that has involved the assessors of workers who have been at the centre of a workplace disaster. You can only certificate that at the time of your assessment judgement you had adequate credible evidence to make the safe judgement of competence ... so you need to be able to show that you have avoided all these issues and have complied with the requirements of the 2025 Standards, the AQF, and the requirements set out in the Training Package.