



Training Accreditation Council

Annual Report



Training Accreditation Council
WESTERN AUSTRALIA

2018 - 2019

Statement of Compliance

Hon Sue Ellery MLC

MINISTER FOR EDUCATION AND TRAINING

In accordance with Section 30 of the *Vocational Education and Training Act 1996*, I submit for your information and presentation to Parliament, the Annual Report of the Training Accreditation Council for the period 1 July 2018 to 30 June 2019.



Ian C Hill
CHAIRMAN
TRAINING ACCREDITATION COUNCIL

16 September 2019

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Acknowledgment: some icons designed by Freepik and Flaticon.

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1. EXECUTIVE SUMMARY

1.1 ABOUT THIS REPORT

This report fulfils the requirements of section 30(1) of the *Vocational Education and Training Act 1996* (VET Act) by reporting on the operations of the Training Accreditation Council (the Council) to the Minister for Education and Training for the period 1 July 2018 to 30 June 2019.

The annual report is prepared on a financial year basis, aligns to the Council's Business Plan and reflects its regulatory responsibilities under the VET Act and the *Standards for VET Regulators 2015*.

Where possible, data for the 2018-2019 reporting period and previous reporting periods have been provided to allow a comparison of activities.

The report comprises:

Executive summary:

- Chairman's report
- 2018-2019 highlights and key activities
- significant issues including current or emerging issues.

Introduction – the Council at a glance:

- overview of the Council's guiding principles, membership and functions
- context in which the Council works
- planning and reporting framework
- arrangements for auditors and accreditation reviewers
- fees and charges.

Performance against Key Priority Areas:

- overview of the Council's performance and achievements relating to the Council's four key priority areas as outlined in its Business Plan 2017 to 2020:
 - a) legislation and compliance
 - b) communication and information
 - c) collaboration and engagement
 - d) quality processes and services.

The Council has aligned its key priority areas and guiding principles to meet the State Government's goals of *Our Priorities: Sharing Prosperity*. In doing this, the Council demonstrates its commitment to achieving the best opportunities for Western Australians.

1.2 CHAIRMAN'S REPORT

On behalf of the Training Accreditation Council, I am pleased to present the Council's Annual Report for 2018-2019. This Annual Report demonstrates the Council's strong commitment to delivering a client-focussed regulatory service in Western Australia by applying a systematic risk based regulatory approach and supporting RTOs through an extensive Education Program.

During the reporting period, the Council strengthened its commitment to providing education and guidance to the sector. This included the expansion of the Council's Education Program with additional workshops offering a range of practical information to support RTOs when designing their training and assessment systems and to support business improvement and compliance practices. Over 420 participants from across Western Australia attended TAC Education Program events.

Through its accreditation function, the Council accredits locally developed VET courses driven by local industry needs. In particular, during 2018-2019, the accreditation of new automation courses for the resources sector and courses to support entry level employment in the aged care and disability sectors will help build the skills and capabilities of the Western Australian workforce in key priority areas.

A number of major national reviews have the potential to introduce significant changes to the sector. The Council has actively contributed to these reviews informing current and future directions of the VET sector. Review outcomes, their potential impact and implications for the VET sector, RTOs and other stakeholders in Western Australia will be considered by the Council as reform work develops over the next few years.

The Council continued to have a strong focus on extensive stakeholder engagement to ensure targeted and proportionate regulation. Engagement with stakeholders incorporates a broad range of activities within Western Australia and at the national level. Insights shared by our stakeholders on issues impacting the quality of training and assessment, made significant contributions to inform the Council's regulatory priorities.

The 2018-2019 TAC Annual Regulatory Strategy identified a range of areas of concern requiring regulatory attention. The Council continued to implement a range of strategies to address these specific areas of concern, including a strategic review into third party arrangements commencing during the reporting period. The review is a major initiative with review findings to be reported in the 2019-2020 period. In recognition of the important role the Certificate IV in Training and Assessment plays as the base qualification for trainers and assessors in the sector, the Council continued its increased scrutiny on RTOs delivering this qualification.

The Council regularly conducts surveys of its RTOs and key stakeholders. Feedback helps the Council to gather valuable data to measure its performance, focus its priorities and support the Council's ongoing commitment to continually improve its services. In October 2018, the Council finalised a survey of its RTOs and stakeholders. Key survey findings confirmed perceptions about Council's performance was positive, with 84% of

respondents rating Council's performance as 'good' or 'excellent'. The Council's communication with RTOs also rated very positive, continuing high levels of satisfaction.

The Council's Secretariat function transferred from the Department of Education to the Department of Training and Workforce Development on 1 January 2019. To maintain the Council's independence as a statutory body, safeguards were established including a Memorandum of Understanding between the Council and the Department of Training and Workforce Development to provide transparency and ensure Council's autonomy as the VET regulator in Western Australia. I would like to acknowledge the work of both Departments and Secretariat staff in ensuring a seamless transition during this period.

The Council maintains an excellent reputation for its depth of knowledge, skills and quality assurance of the sector. I extend a thank you to my fellow Council Members for their contribution, collaboration and support during the reporting period. I would also like to acknowledge outgoing Member Mr Ron Dullard and take this opportunity to welcome new Member Ms Jill Jamieson to the Council, following her appointment by the Minister for Education and Training.

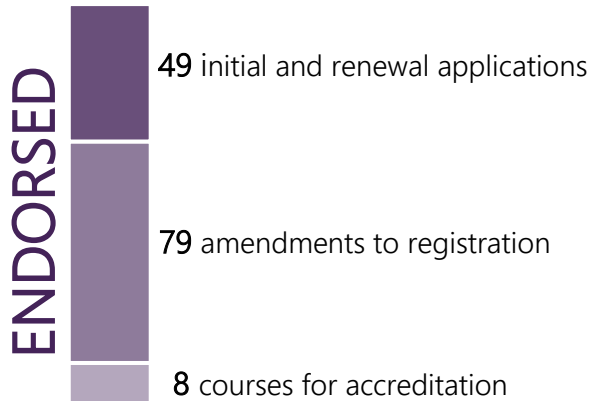
The Council could not undertake its work without the significant commitment of the Council's Secretariat. The Council would like to extend its gratitude to the Council's Secretariat provided by the Department of Training and Workforce Development for their dedication, on-going professional conduct and expertise provided in supporting the work of the Council.



Ian C Hill
CHAIRMAN
TRAINING ACCREDITATION COUNCIL

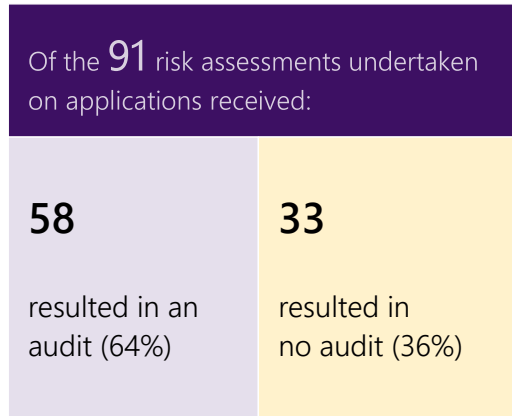
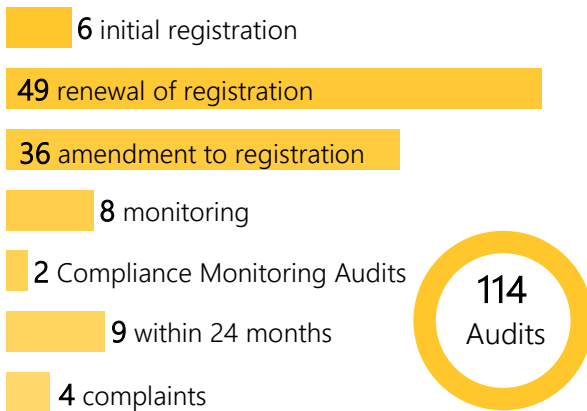
1.3 2018-2019 HIGHLIGHTS AND KEY ACTIVITIES

84% of RTOs and stakeholders rated Council's performance as 'good' or 'excellent'



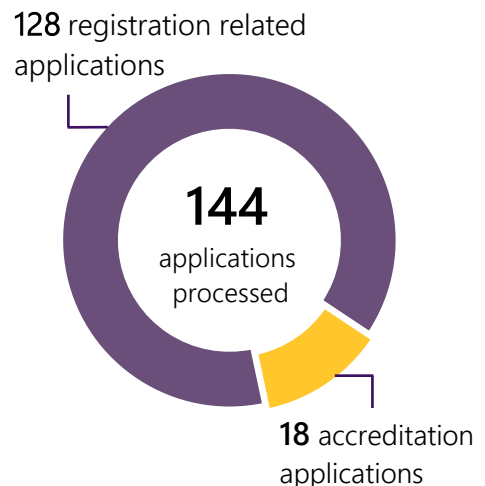
-  9 education workshops
-  6 webinars
-  428 participants in the education program
-  69 formal meetings with stakeholders
-  5 RTOs approved in the Compliance Recognition Program
-  Sponsored 2018 'Trainer of the Year' category - WA Training Awards

Audit types



RISK FOCUS

- Consistent, proportional and transparent risk approach
- Targeting areas of identified risk to quality VET outcomes
- Combining regulation with education and information



1.4 SIGNIFICANT ISSUES IMPACTING ON COUNCIL

Major national reviews aimed at improving the quality of VET in Australia commencing in 2017-2018 gained momentum during 2018-2019. These include the review of the *National Vocational Education and Training Regulator Act 2011* (the NVETR Act), the Australian Qualifications Framework (AQF) and the Prime Minister's independent review of the VET sector.

During the reporting period the Council contributed formally to the reviews, including participation at numerous meetings with State and national VET stakeholders and formal written submissions. Any agreed changes to regulatory practice and legislation resulting from the reviews will need consideration to implementation impacts and implications for RTOs and VET regulators.

- **NVETR Act (Braithwaite Report)**

The NVETR Act establishes the national VET Regulator, the Australian Skills Quality Authority. In June 2018 the Australian Government released the '*All eyes on quality: Review of the National Vocational Education and Training Regulator Act 2011, Australian Government Response*' which outlined the Australian Government's response to the 23 recommendations from the review.

The review considered the legislative capacity of the national VET regulator to efficiently and effectively regulate the sector. Through the Council of Australian Governments Industry and Skills Council (CISC), the Australian Government is working with States and Territories, including VET regulators, to progress reforms that respond to the recommendations.

- **AQF review**

The AQF is the national policy for regulated qualifications in Australian education and training. It incorporates qualifications from all three education and training sectors into a single comprehensive national qualifications framework.

The current review of the AQF commenced in 2018. A Discussion Paper was released in December 2018, followed by public consultations in February 2019. The review is anticipated to be completed by the end of September 2019.

- **Review of the VET sector (Joyce Report)**

In November 2018, the Prime Minister the Hon Scott Morrison announced an independent review of the VET sector. The Review was conducted early 2019 by the Hon Steven Joyce.

During the reporting period, the Australian Government announced a commitment to establish a National Skills Commission and National Skills Commissioner, a National Careers Institute and Careers Ambassador and pilot Skills Organisations in two key priority industries. Work was also underway to prepare for a Council of Australian Governments (COAG) meeting to be held in August 2019 at which COAG members would consider a new vision for VET.

2. INTRODUCTION – THE COUNCIL AT A GLANCE

The Council delivers a client-focussed regulatory service for the VET sector in Western Australia through quality assured registration and accreditation services.

2.1 GUIDING PRINCIPLES

The Council has developed guiding principles that communicate to stakeholders the way in which it intends to undertake its business. The Council's guiding principles underpin its commitment to:

- be open, accountable and transparent
- be clear on its role as a regulatory body
- embed an outcomes focus
- be fair and equitable
- maintain a culture of continuous improvement
- communicate clearly and concisely.

2.2 MEMBERSHIP

The Council has seven members who are appointed by the Minister for Education and Training in accordance with section 25 of the VET Act. Members are selected on the basis of their expertise, qualifications and experience relevant to the Council's functions.

For the reporting period, the members were:

Mr Ian Hill, Chairman

Miss Janelle Dawson, Sterling Business College Pty Ltd

Mr Ron Dullard, Consultant (1 July – 31 December 2018)

Mr Neil Fernandes, Neil C Fernandes Consulting

Ms Debra Goostrey, ATEA Consulting

Ms Marjorie Louise Hillman

Ms Jill Jamieson, J Jamieson Consulting (from 1 January 2019)

Ms Siobhán Mulvey, Health Support Services

The Training Accreditation Council has an established Code of Conduct which was developed in line with the Public Sector Commission's Conduct Guide of Boards and Committees. All members are provided with a copy of the Code of Conduct.

The Code of Conduct provides guidance about ethical conduct, public duties and legal responsibilities. There were no issues in relation to the Code of Conduct or Code of Ethics during the reporting period.

2.3 FUNCTIONS OF THE COUNCIL

The Council's functions are detailed in Part 4 and 7A of the VET Act. The focus is on quality assurance, registration of training providers and the accreditation of courses in respect to VET in Western Australia.

Under the VET Act, the functions of the Council are to:

- register training providers
- accredit courses.

In discharging its functions, the Council may also:

- inquire into training providers and courses
- vary, suspend or cancel registration
- vary, suspend or cancel accreditation
- cancel qualifications.

Provision for appeals against Council decisions is available through the State Training Board under section 58G of the VET Act.

During the reporting period the State Government approved the transfer of the administration of Part 4 of the VET Act, requiring the transfer of the Council's Secretariat from the Department of Education to the Department of Training and Workforce Development, with effect from 1 January 2019.

In managing the transfer, a Memorandum of Understanding (MoU) was established between the Council and the Department of Training and Workforce Development. The MoU provides transparency around the relationship between the Council and the Department, ensuring the independence of the Council and provides the framework to enable Council to perform its functions under the VET Act. Further, the head of the Secretariat, the Director Training Regulation, reports directly to the Director General to maintain independence over regulatory activity and decisions.

2.4 THE CONTEXT IN WHICH THE COUNCIL WORKS

The Council is an independent statutory body that assures the quality of training and assessment of RTOs registered with the Council and accreditation of courses in the VET sector in Western Australia. The Council operates within an agreed national VET regulatory framework defined in a set of standards, guidelines and policies aimed at achieving national consistency in the way RTOs and accredited courses are registered and monitored.

The Council's operating framework includes:

- *Vocational Education and Training Act 1996*
- *Vocational Education and Training (General Regulations) 2009*
- *Standards for VET Regulators 2015*
- *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs)

- Australian Quality Training Framework (AQTF) 2007 Standards for Accredited Courses
- Australian Qualifications Framework
- Fit and Proper Person Requirements as outlined in the Standards for RTOs
- Financial Viability Risk Assessment Requirements as outlined in the Financial Viability Assessment Guidelines for the Registration of Training Providers 2017 issued by the Minister for Education and Training under section 13 of the VET Act
- Data provision requirements as outlined in the Standards for RTOs.

2.5 VET REGULATORY ARRANGEMENTS IN WESTERN AUSTRALIA

In Western Australia two VET Regulators, the Council and the national VET regulator, the Australian Skills Quality Authority (ASQA), have responsibility for the regulation of providers. This arrangement resulted from the COAG decision in late 2009 to endorse the establishment of a national regulator for the VET sector through the referral of State powers to the Australian Government. Western Australia and Victoria did not refer powers.

Through the Council, Western Australia has continued to regulate those providers who operate only in Western Australia. To ensure a nationally consistent regulatory environment the Western Australian government enacted legislation that mirrors the Australian Government arrangements.

This arrangement enables State government oversight of the VET provider market, continuous improvement of the sector, responsiveness to State based priorities and risks, timely intervention and protection of the State's investment in VET.

2.6 PLANNING AND REPORTING FRAMEWORK

In order to carry out its functions, the Council uses an outcomes based planning and reporting framework.

The framework consists of a Business Plan that is prepared on a three year basis and reviewed annually. The framework also consists of a corresponding operational plan for the support services provided by the Council's Secretariat, and an Annual Report on the achievements of the Council. In addition, the Council also reports on VET regulation related outcomes at a national level, as required.

This approach ensures comprehensive monitoring and reporting of the Council's activities and achievements against the key priorities and enables monitoring of progress against the respective business and operational plans.

2.7 ARRANGEMENTS FOR RTO AUDITORS AND ACCREDITATION REVIEWERS

The Council’s RTO Auditors and Accreditation Reviewers are appointed through a public tender process, with the latest RTO Auditor and Accreditation Reviewer Panels commencing on 1 March 2016. The panels were appointed for a one year period with three, one year extension options. The third and final one year option to extend was enacted in February 2019.

The primary role of the RTO Auditors is to undertake audits of RTOs to report on compliance against the Standards for RTOs. Accreditation Reviewers assess submissions for accreditation to ensure that they reflect the requirements of the AQTF2007 Standards for Accredited Courses. RTO Auditors and Accreditations Reviewers appointed to the panel are listed in Table 1.

Table 1: Panel of RTO Auditors and Accreditation Reviewers as at 30 June 2019

Panel	Name	Organisation
RTO Auditors	Allison Burnett	Specialised Training Solutions
	Mairead Dempsey	Assessment Training and Research Consultancy Services
	Russell Docking	Skills Resource Management Systems
	Cherrie Hawke	Torque Holdings Pty Ltd
	David Love	Workplace Skills Management Pty Ltd
	Sharon Stewart	LCN Training Solutions
	Michaela Tarpley	Aptus Solutions Pty Ltd
	Pam Vlajsavljevich	Pam Vlajsavljevich
	Claire Werner	The Meyvn Group
Accreditation Reviewers	Mairead Dempsey	Assessment Training and Research Consultancy Services
	Russell Docking	Skills Resource Management Systems
	Cherrie Hawke	Torque Holdings Pty Ltd

The Department through the Council’s Secretariat implements a performance management model on behalf of the Council, for the panel of external RTO Auditors and Accreditation Reviewers.

To ensure consistency in the approach to RTO audits and reviews of course accreditation applications, the Council’s Secretariat facilitates moderation activities, including moderation forums, in which all contracted RTO Auditors and Accreditation Reviewers are required to attend.

During the reporting period three RTO Auditor moderation forums and one Accreditation Reviewers forum were conducted. The forums provide RTO Auditors and Accreditation Reviewers with moderation activities, the opportunity to develop an agreed approach for the conduct of audits, and updates on State and national VET developments.

2.8 FEES AND CHARGES

In Western Australia fees and charges apply for the registration of training organisations and accreditation of VET courses with the Council. Western Australian fees and charges have not been amended since 2014. The approved schedule of fees and charges is provided at Table 2.

Table 2: Registration and accreditation fees as at 30 June 2019

INITIAL REGISTRATION FEES		
Application Lodgement Fee	Payable on application	\$800
Application Assessment Fee Base fee includes up to 4 qualifications, up to 20 units of competency and up to 2 delivery sites. <i>Total application fee, including lodgement and assessment, is capped at \$50,000.</i>	Base fee Plus: - each additional qualification - each additional unit of competency - each additional delivery site	\$8,000 \$145 \$50 \$1,395
RENEWAL OF REGISTRATION FEES		
Application Lodgement Fee	Payable on application	\$900
Application Assessment Fee Base fee includes up to 4 qualifications, up to 20 units of competency and up to 2 delivery sites. <i>Total application fee, including lodgement and assessment, is capped at \$50,000.</i>	Base fee Plus: - each additional qualification - each additional unit of competency - each additional delivery site	\$7,000 \$145 \$50 \$700
AMENDMENT TO REGISTRATION FEES		
Amendment to Scope Application	One qualification Plus: - each additional qualification	\$920 \$135
<i>*For transition to equivalent training package qualifications or units of competency, no application is required and no fees apply</i>	First seven units of competency Plus: - each additional unit	\$240 \$135
	Transition to equivalent accredited course(s)	\$240 per application
ANNUAL FEES		
Annual RTO Registration Fee (includes any number of units of competency)	0-4 qualifications 5-10 qualifications 11-60 qualifications 61 or more qualifications	\$1,130 \$3,220 \$6,975 \$10,730

Note: Applications for Skill Sets are charged per unit of competency.

COMPLIANCE MONITORING AUDIT (CMA) CHARGES		
Costs and expenses incurred in conducting the audit	First 4 hours (minimum charge)	\$1,100
	Plus:	
	- each additional hour	\$275
	Plus:	
	- official travel costs	If applicable

Note: CMA charge includes GST.

ACCREDITATION FEES		
Application for accreditation/ reaccreditation of a course	Includes: Courses at AQF Level 1 (Certificate I) and above Short courses below AQF Level 1 (Course In...)	\$8,070
Amendment to accredited course	Per course <i>Note: excludes where the amendment involves updates to imported units from training packages that are deemed equivalent</i>	\$2,290

Note: All registration and accreditation fees exclude GST.

3. LEGISLATION AND COMPLIANCE - Key Priority 1

Outcome Indicators

The Council's success in achieving Key Priority 1 is demonstrated by the extent to which the following indicators have been achieved:

Outcome 1	The Council's governance requirements are met.
Outcome 2	Council regulates training providers in accordance with the <i>Standards for Registered Training Organisations (RTO) 2015</i> , <i>Standards for VET Regulators 2015</i> , <i>Vocational Education and Training Act 1996</i> and <i>Vocational Education and Training (General) Regulations 2009</i> .

Work undertaken by the Council to progress these priorities and to achieve Key Priority 1 is detailed as follows.

3.1 THE COUNCIL'S GOVERNANCE REQUIREMENTS

3.1.1 Council membership 2018-2019

Membership of the Council complied with the requirements of the VET Act during the reporting period, with seven members appointed by the Minister for Education and Training.

3.1.2 Operations of the Council

During the reporting period the Council was supported by the Department of Education (1 July to 31 December 2018) and the Department of Training and Workforce Development (1 January to 30 June 2019) through the services of the Council's Secretariat located in Osborne Park, Western Australia.

In supporting the Council, key roles of the Council's Secretariat are to implement the Council's Risk Framework, including its Regulatory Strategy, and to process applications for registration of training organisations and accreditation of courses for consideration by the Council. The Council's Secretariat provides high level advice and substantial support to the work of the Council on State and national VET regulatory and policy matters.

The Council holds full meetings on a monthly basis to consider registration and accreditation applications, various regulatory related matters, and to consider key strategies to progress the work of the Council. The Council formally met **14** times over the 12 months to 30 June 2019, which consisted of 12 full Council meetings and two Executive Committee meetings. Additional full Council meetings and Executive Committee meetings are held as required.

3.1.3 Remuneration

Section 63 of the VET Act provides that Training Accreditation Council members are entitled to receive remuneration in the form of sitting fees. During the 2018-2019 reporting period Council members received the following remuneration.

Table 3: Council remuneration

Position	Name	Type of remuneration	Period of membership	Gross/actual remuneration ^(a)
Chairman	Mr Ian Hill	Annual	12 months	\$42,729
Member	Miss Janelle Dawson	Annual	12 months	\$23,996
Member	Mr Ron Dullard	Annual	6 months	\$14,767
Member	Mr Neil Fernandes	Annual	12 months	\$23,996
Member	Ms Debra Goostrey	Annual	12 months	\$23,996
Member	Ms Louise Hillman	Annual	12 months	\$23,996
Member	Ms Jill Jamieson	Annual	6 months	\$9,229
Member	Ms Siobhán Mulvey	-	12 months	\$1,846 ^(b)
				\$164,555

(a) Part of the 2017–2018 sitting fees were paid in 2018–2019, excluding for Ms Jamieson who was appointed from 1 January 2019.

(b) Not eligible for sitting fees in 2018–2019. Payment relates to remuneration for 2017-2018 sitting fees paid in 2018–2019.

3.1.4 Compliance with the *Standards for VET Regulators 2015*

The *Standards for VET Regulators 2015* outlines the framework for the approach to be taken by VET regulators to ensure:

- the integrity of nationally recognised training by regulating RTOs and VET accredited courses using a risk-based approach that is consistent, effective, proportional, responsive and transparent,
- consistency in the implementation and interpretation of the Standards for RTOs and Accredited Courses, and
- accountability and transparency in undertaking its regulatory functions.

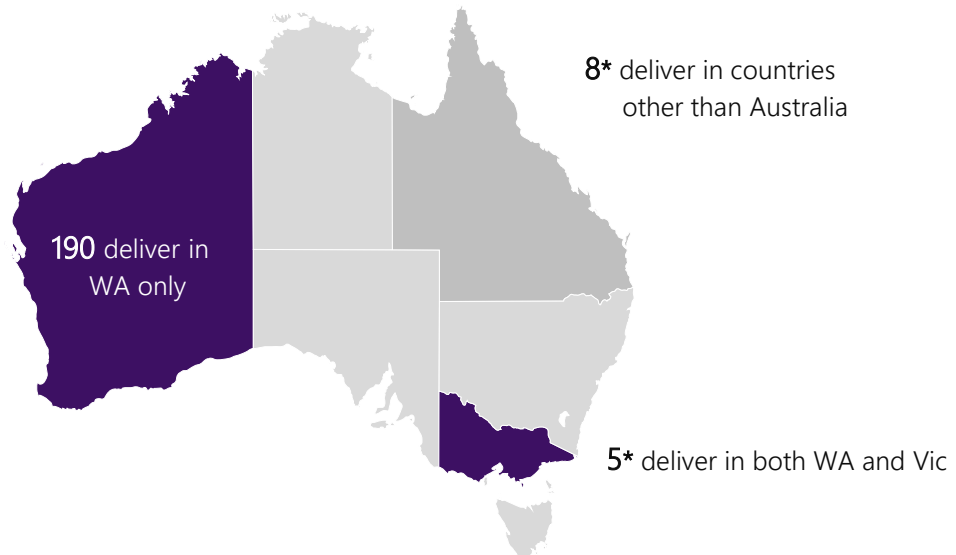
During this reporting period, the Council progressed a range of initiatives to ensure compliance with the *Standards for VET Regulators 2015* and these are detailed throughout the report.

Changes were also implemented to the quality system, which is designed to support the Council's functions as the VET Regulator and ensure compliance with a range of State and national requirements. The changes made to the quality system aligned with Council's risk approach to regulation including a review of operational processes.

3.2 OVERVIEW OF THE REGULATORY MARKET

3.2.1 Registration of Training Organisations as at 30 June 2019

201 RTOs registered with the Council



*Includes two RTOs in both categories

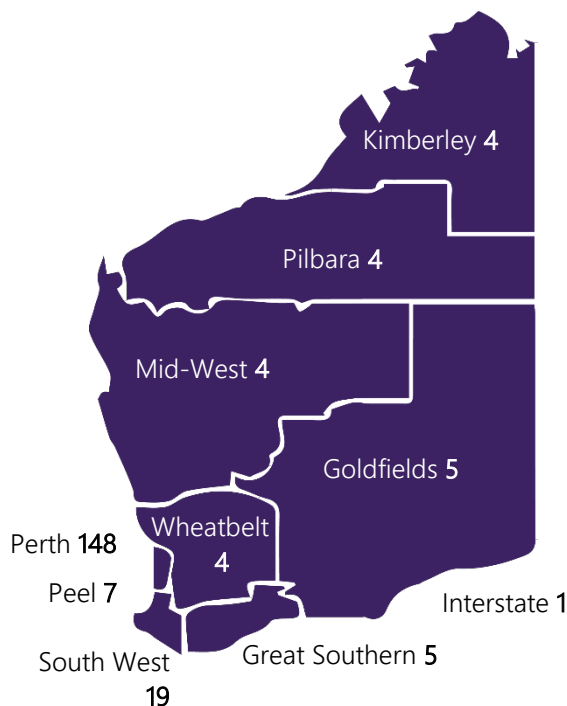
During the 2018-2019 year:

- 16 RTOs voluntarily relinquished registration
- 7 RTOs did not renew registration when it expired
- 2 RTOs had a sanction of cancellation imposed on their registration

3.2.2 Demographics of RTOs

The following provides an overview of the Western Australian VET market for the 2018-2019 reporting period.

Figure 1: RTOs by location



The location is based on the RTO's head office.

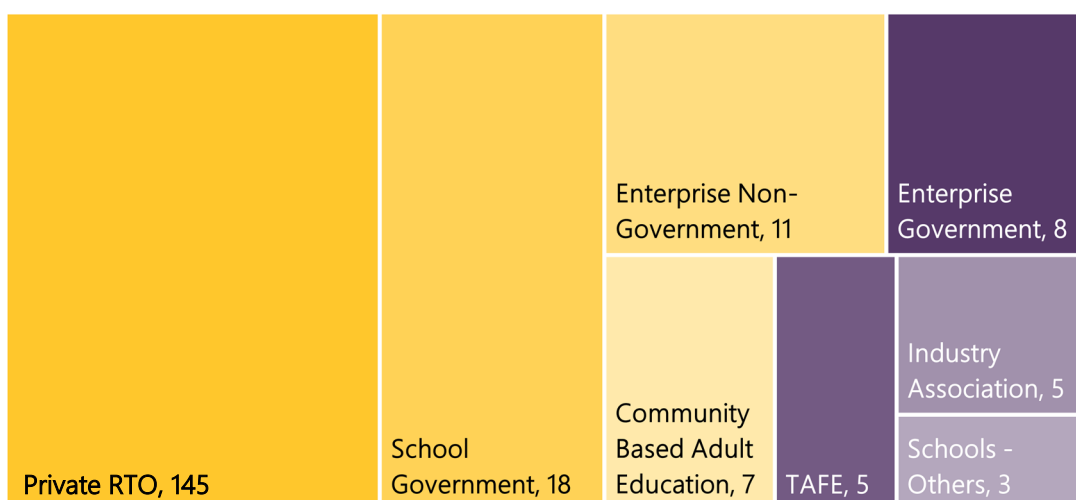
Of the 201 RTOs registered with the Council, **148** (74%) were located in the Perth region and the remaining **53** (26%) are spread across regional Western Australia.

The distribution of RTOs by location remained fairly stable during the reporting period.

RTOs by type of business

145 (72%) of the 201 RTOs registered with the Council at 30 June 2019 were private RTOs. The remaining **56** RTOs included a range of business types as presented in Figure 2.

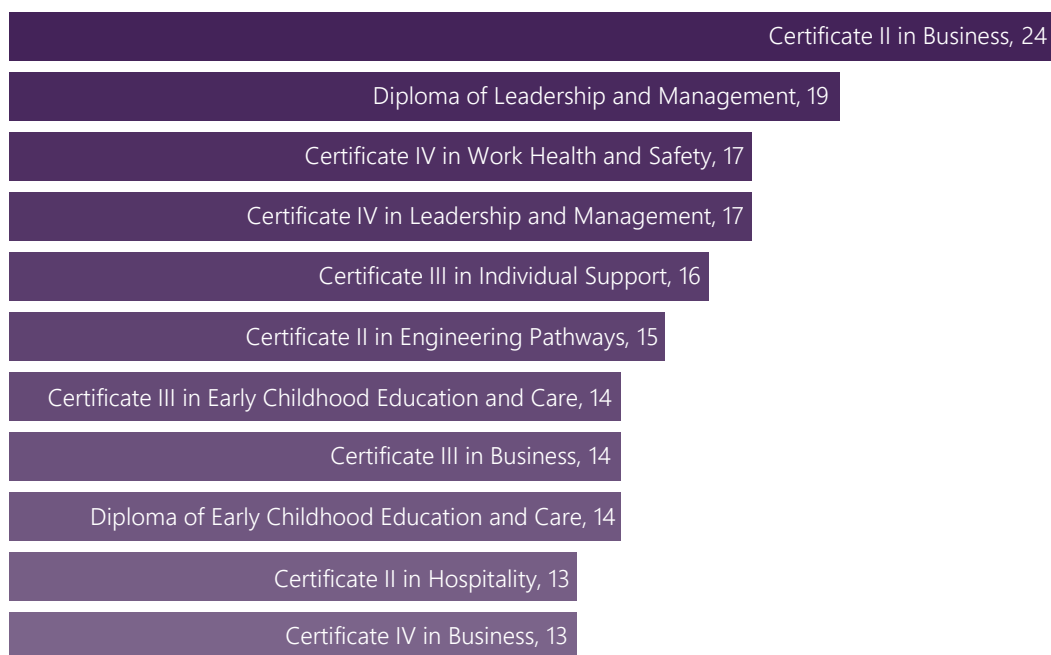
Figure 2: RTOs by type of business



Top 10 overall qualifications

Figure 3 provides a profile of the Western Australian regulatory market based on the highest number of qualifications on the scope of registration for Council registered RTOs as at 30 June 2019.

Figure 3: Top 10 overall qualifications

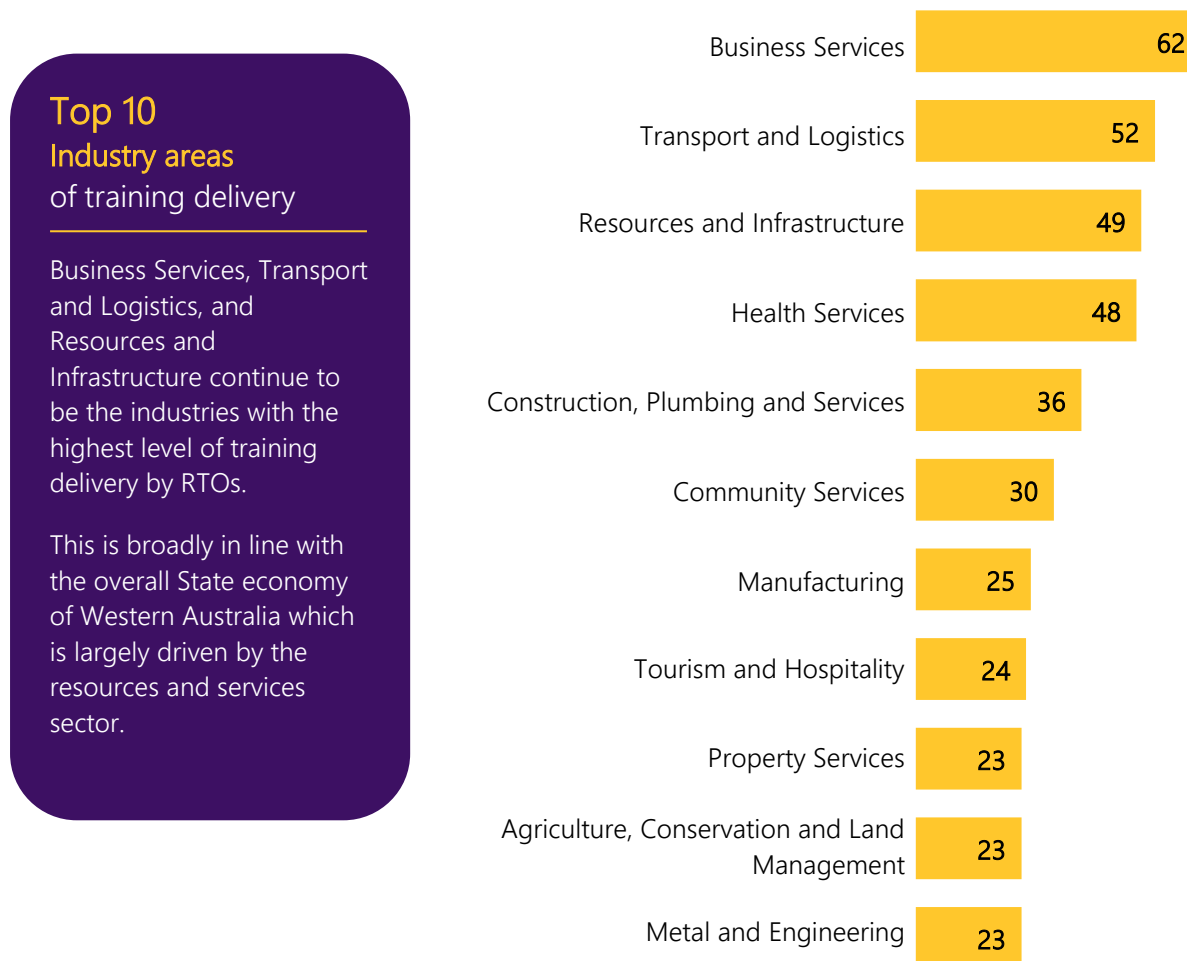


Top 10 industry areas of training delivery

Of the **201** RTOs registered with the Council, **62** (31%) had Business Services on their scope of registration, followed by **52** (26%) in Transport and Logistics and **49** (24%) in Resources and Infrastructure.

Figure 4 provides a summary of the top 10 industry areas of training delivery.

Figure 4: Top 10 industry areas of training delivery - based on the number of endorsed industry training packages on the scope of registration of Council registered RTOs as at 30 June 2019.



Top 10 Industry areas of training delivery

Business Services, Transport and Logistics, and Resources and Infrastructure continue to be the industries with the highest level of training delivery by RTOs.

This is broadly in line with the overall State economy of Western Australia which is largely driven by the resources and services sector.

3.2.3 Accredited Courses

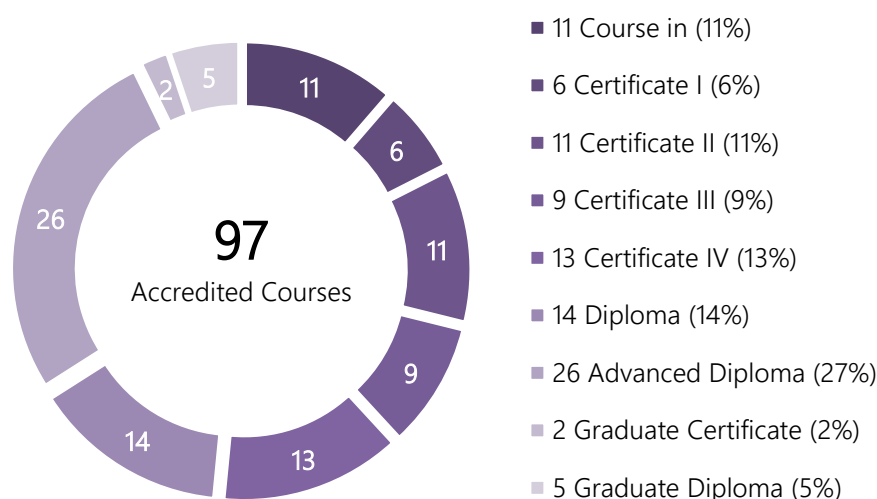
In its capacity as the VET Regulator the Council accredits courses in line with the requirements of the AQTF2007 Standards for Accredited Courses to meet training needs not addressed in training packages. Through its accreditation function, the Council is able to accredit locally developed courses driven by local industry needs, in a timely manner, meeting State priorities and industry requirements.

The Council also conducted a review of its course accreditation arrangements during the reporting period. The outcomes of the review focussed on three main areas - industry support for accredited courses, course monitoring and evaluation and use of modules. Several processes and procedures were updated to include new requirements including a biennial survey for course owners to confirm evaluation of courses is undertaken, and

provision of a module request and template form to provide clarity to course owners on the use of modules in accredited courses.

At 30 June 2019 the Council accredited a total of **97** accredited courses. Figure 5 shows courses accredited by the Council by AQF level.

Figure 5: Accredited courses by AQF level as at 30 June 2019



* Percentages may not total 100% due to rounding

3.2.4 Regulatory Activity

During the reporting period the Council continued to regulate the Western Australian VET sector in accordance with the requirements of the VET Act and the Standards. In line with its regulatory requirements the Council continued to apply a rigorous approach to training provider compliance and the assessment of courses for accreditation.

The following section provides an overview of the Council’s regulatory activity for the reporting period 1 July 2018–30 June 2019.

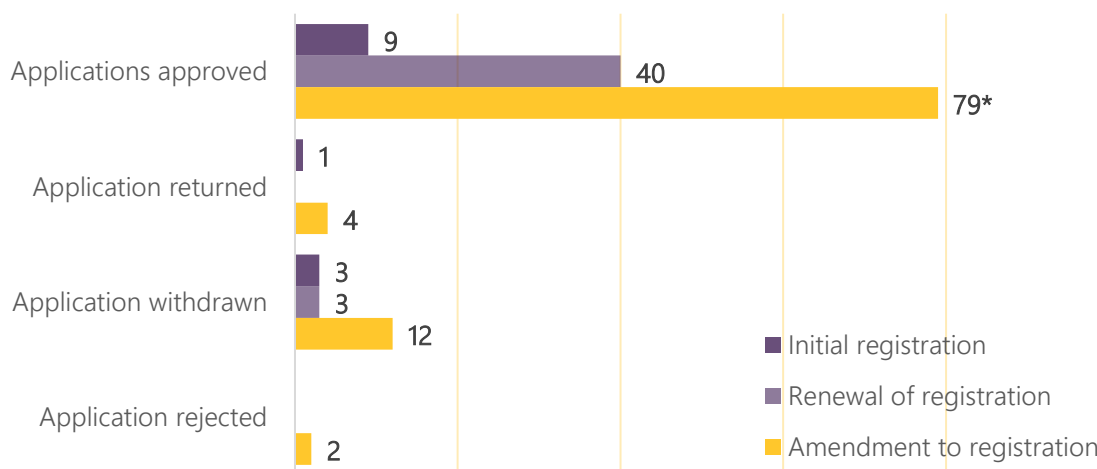
Registration activity

During the 2018-2019 year the Council approved a total of **128** new registration applications from training organisations of which **nine** were initial registrations, **79*** were amendment to registration applications and **40** were renewal of registration applications.

The amendment applications excludes those processed through the automatic replacement of equivalent training package products process.

Figure 6 provides an overview of registration applications approved, returned, withdrawn and rejected during the reporting period.

Figure 6: Registration activity for 2018-2019



* Excludes 421 amendments processed via the replacement of equivalent training package products process.

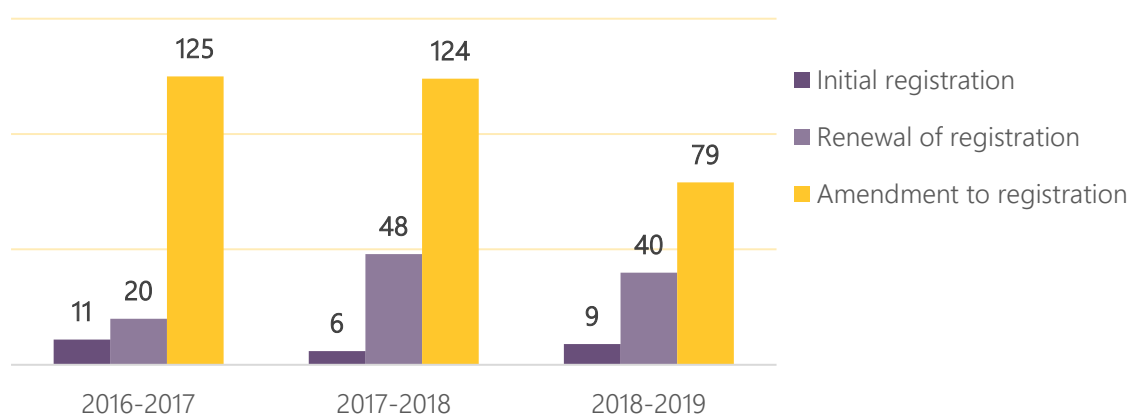
While the majority of applications received during the reporting period were approved by the Council, several registration applications were withdrawn and a number of applications returned or rejected.

An application is withdrawn following a request from the applicant and may occur at any stage of the amendment to registration process. An application is returned if the application has not met the application evidence requirements. An application is rejected by the Council if the organisation is unable to demonstrate compliance with the Standards for RTOs following completion of the audit process.

Applications endorsed

Figure 7 provides an overview of the applications endorsed by the Council for the 2018-2019 period and the two previous reporting periods.

Figure 7: Registration activity – applications endorsed

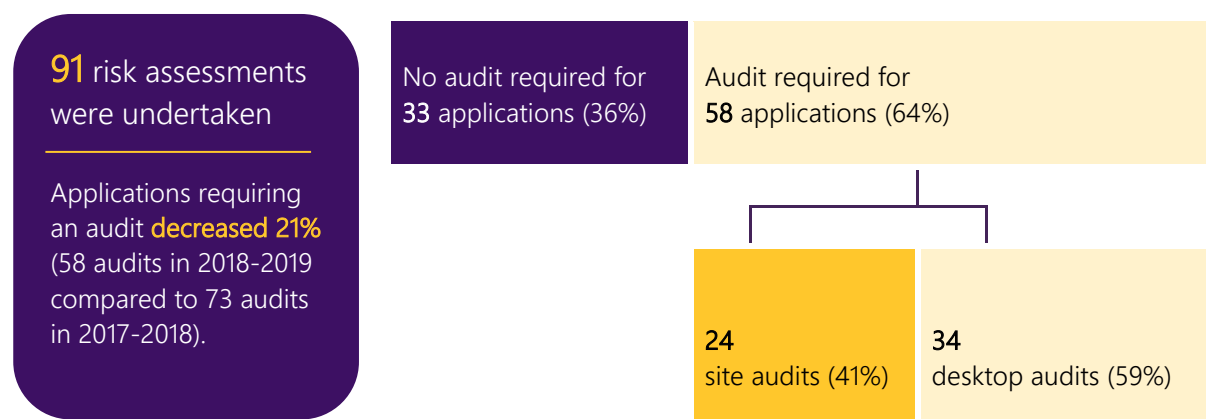


The number of applications for renewal of registration varies based on the cyclic nature of training provider registration periods. Amendments to registration are initiated by the training provider and the decrease could be attributed to RTO business requirements, delivery focus and fewer changes to training package products.

Risk Management of Applications

The Council implements a systematic risk management approach to assessing all applications submitted by training providers with all applications subject to a risk assessment process. The risk assessment process determines whether or not the application warrants an audit.

Figure 8: Risk assessments conducted on applications received



During the 2018-2019 reporting period, a total of **91** risk assessments on applications received were undertaken. The decrease in RTO risk assessments can be directly attributed to the decrease in applications received.

3.2.5 Audit Activity

Overview of Audits

Audits offer a point-in-time insight into the quality of the training and assessment services being provided and inform the Council’s regulatory decisions. During the reporting period the Council conducted a total of **114** audits. Audits were undertaken in accordance with the Standards and the Council’s Risk Framework.

Figure 9 provides an overview of audits undertaken during the reporting period.

Figure 9: Total audits for 2018-2019

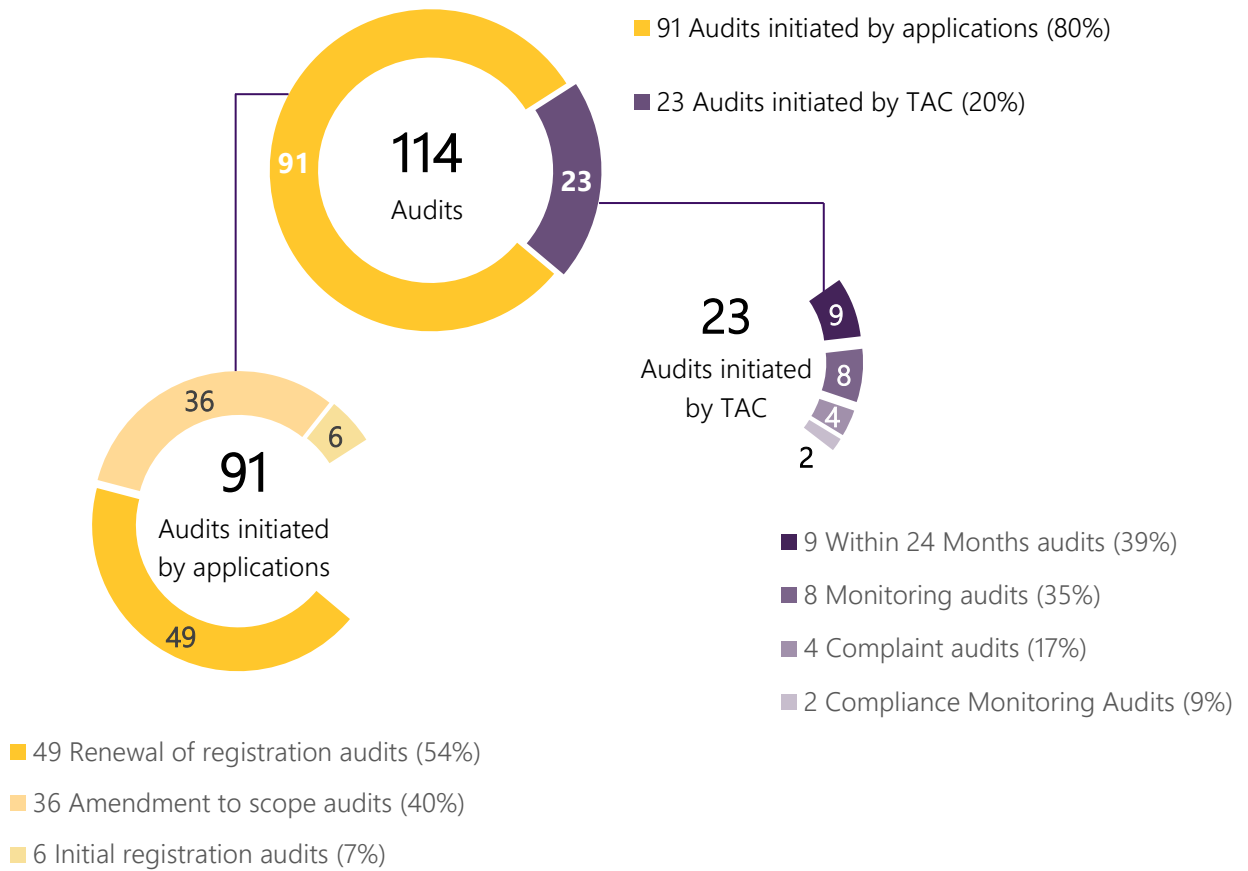
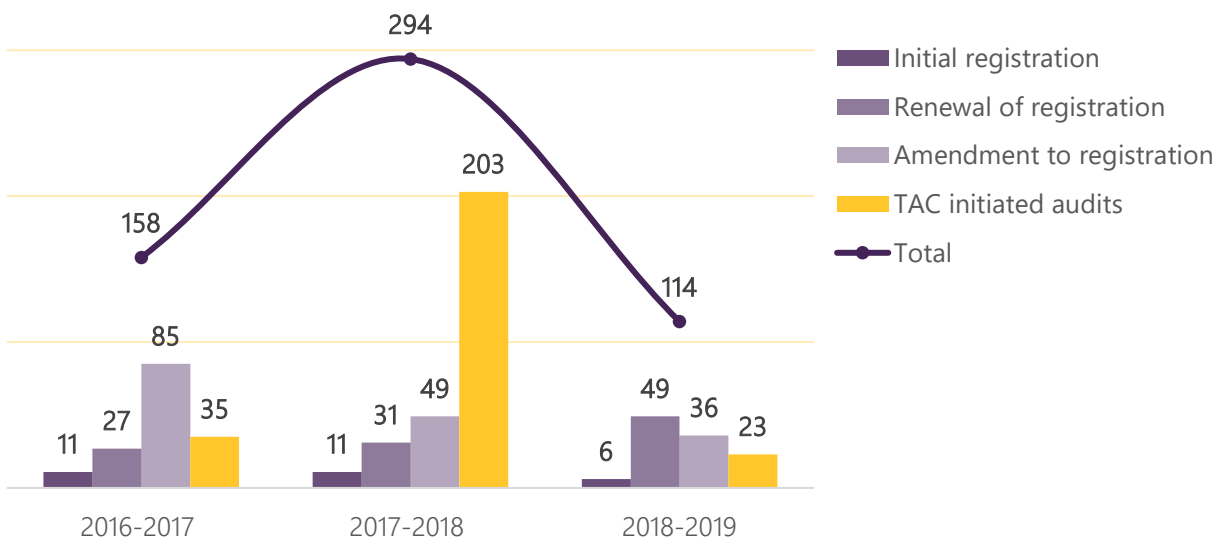


Figure 10 provides a comparison of the type and number of audits conducted in the 2018-2019 period and the two previous reporting periods.

Figure 10: Total number of audits by financial years



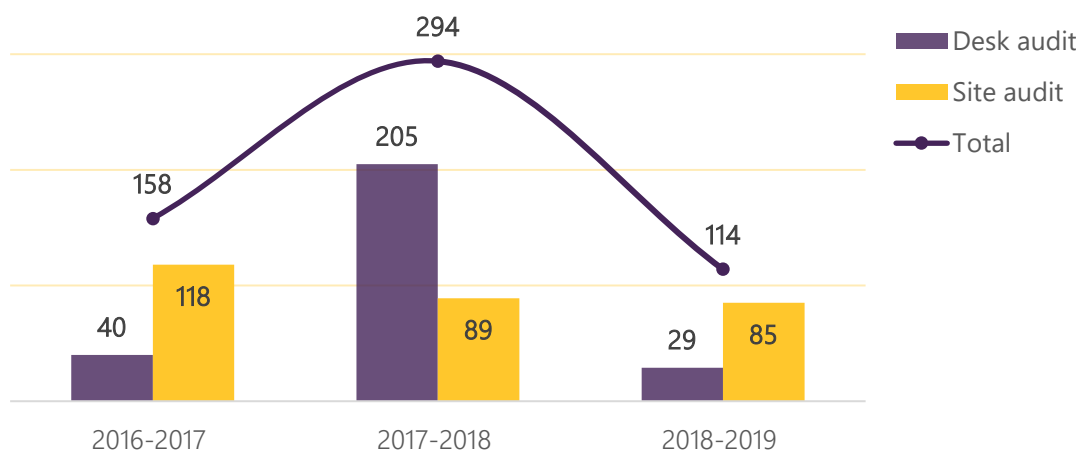
The number of Council initiated audits decreased in 2018-2019 compared to the previous reporting period and can be directly attributed to the 2017 Marketing and Governance Audit Strategy, with 175 of the 203 audits linked to the strategy.

Audits by Method

The Council utilises the outcome of the application risk assessment process to determine the appropriate regulatory response to be applied. The outcome of this process could result in no audit being required, or either a desktop audit and/or site audit being conducted.

Figure 11 provides a comparison of the audit method between the current and the previous reporting periods.

Figure 11: Total number of audits by method



The high number of desk audits undertaken in 2017-2018 can be directly attributed to the 2017 Marketing and Governance Audit Strategy.

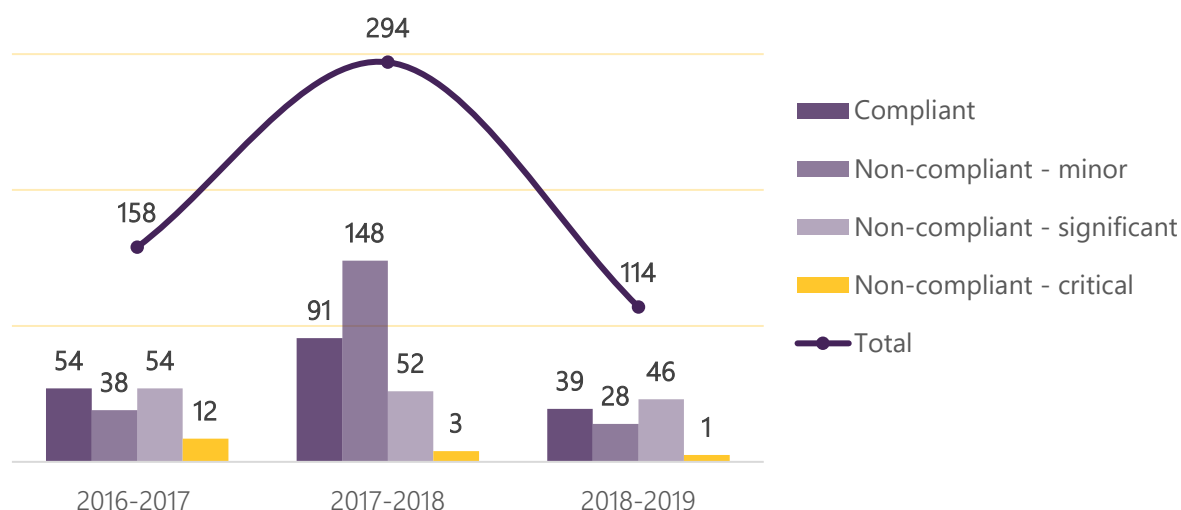
Audit outcomes

While the Council conducted a total of **114** audits, it should be noted that the number of audits undertaken by the Council does not align to the number of training organisations, only total audits conducted. Audits may include multiple audit types for individual training organisations during the reporting period.

This is illustrated by the following example. During a 12 month period, a training organisation may have submitted several amendment to scope applications related to proposed new delivery and the Council may have also initiated an audit in its capacity as the VET Regulator, such as a strategic review audit.

The following figure provides a breakdown of the outcomes of audits conducted during the 2018-2019 period (based on overall level of non-compliance identified at the main audit).

Figure 12: Overall level of non-compliance at main audit



An overview of the **114** audits for delivery of training and assessment conducted by Council during 2018-2019 is provided at Figure 13 and Figure 14.

Figure 13: Overview of audits conducted (based on main audit outcome)

Market entry audits, 42 out of 114 (37%)		Audits of existing RTOs, 58 out of 114 (51%)		Identified risk audits, 14 out of 114 (12%)	
Compliant 15 out of 42 (36%)	Non-compliant 27 out of 42 (64%)	Compliant 18 out of 58 (31%)	Non-compliant 40 out of 58 (69%)	Compliant 6 out of 14 (43%)	Non-compliant 8 out of 14 (57%)

Figure 14: Summary of audit outcomes

<p>Market entry audits</p> <p><i>Initial and amendment applications</i></p>	<ul style="list-style-type: none"> • 42 market entry audits undertaken <ul style="list-style-type: none"> – 6 initial registration audits – 36 amendment to scope audits • of the 42 audits, 15 (36%) achieved compliance at main audit • of the 42 audits, 27 (64%) were non-compliant at main audit <ul style="list-style-type: none"> – of the 27 audits, 18 (67%) were compliant following the 20-day evidence review period <p>Training organisations can only commence delivery if full compliance has been achieved against the Standards and the application is subsequently endorsed by the Council.</p> <p>These types of audits have no impact on students or industry as delivery has not occurred prior to endorsement of the application by the Council.</p>
<p>Audits of existing RTOs</p> <p><i>Renewal applications, within 24 months audits</i></p>	<ul style="list-style-type: none"> • 58 audits on existing RTOs undertaken <ul style="list-style-type: none"> – 49 renewal of registration audits – 9 within 24 months audits • of the 58 audits, 18 (31%) achieved compliance at main audit • of the 58 audits, 40 (69%) were non-compliant at main audit <ul style="list-style-type: none"> – of the 40 audits, 34 (85%) were compliant following the 20-day evidence review period <p>RTOs applying to renew their registration with the Council must demonstrate compliance against the Standards in order to be re-registered and enable delivery to continue.</p> <p>Within 24-months audits are initiated by the Council and are a requirement prescribed under the <i>Standards for VET Regulators 2015</i>. These audits are undertaken within the first two years of a new RTO’s registration to confirm the RTO complies with the requirements of the Standards for RTOs.</p>
<p>Identified risk audits</p> <p><i>Monitoring, complaints, CMAs</i></p>	<ul style="list-style-type: none"> • 14 identified risk audits were undertaken of existing RTOs <ul style="list-style-type: none"> – 8 monitoring audits – 4 complaints audits – 2 Compliance Monitoring Audits • of the 14 audits, 6 (43%) achieved compliance at main audit • of the 14 audits, 8 (57%) were non-compliant at main audit <ul style="list-style-type: none"> – of the 8 audits, 5 (63%) were compliant following the 20-day evidence review period <p>These audits may have minimal disruption to an RTO’s operation unless the audit outcome warrants further regulatory actions. For example, further actions may result in the Council imposing sanctions on the RTO’s registration including varying registration, placing conditions on the registration, suspension or cancellation of the registration.</p>

Non-compliance identified at audit is considered by the Council in line with established processes. If the outcome of the main audit is non-compliance, training organisations are provided with an evidence review period of 20 working days to address outstanding issues. RTOs must demonstrate compliance with the Standards in order to continue to operate within the Western Australian VET market.

3.2.6 Annual Declaration on Compliance

It is a requirement of registration with the Council that RTOs comply with mandatory reporting requirements. This includes a requirement for RTOs to provide the Council with an annual declaration on compliance.

The declaration is in relation to whether the RTO:

1. currently meets the requirements of the Standards for RTOs across all its scope of registration and if not, action taken or planned to address the non-compliance, and
2. has met the requirements of the Standards for RTOs for all Australian Qualifications Framework (AQF) certification documentation issued in the last financial year.

By submitting the annual declaration the RTO's legally responsible person is confirming that the RTO systematically monitors and evaluates training and assessment strategies and practices, and uses the outcomes of monitoring and evaluation to inform improvements in business and educational practice.

The annual declaration covers the RTO's entire scope of operations, including all services provided on its behalf by other organisations under third party arrangements, and for all locations where the RTO operates in Western Australia, Victoria or overseas. RTOs were required to submit the 2017-2018 Annual Declaration on Compliance by 30 September 2018 with all active RTOs meeting this requirement.

3.2.7 Strategic Reviews

Strategic reviews are undertaken to ascertain whether RTOs providing training and assessment services are meeting the requirements set out in the Standards for RTOs, the nationally recognised training products and in line with industry expectations. They are an in-depth analysis of systemic issues affecting the quality of VET outcomes and enable the Council to respond to quality issues in Western Australia in a timely manner.

Strategic reviews are managed by the Council's Secretariat with the guidance of industry representatives and other relevant technical experts, who provide invaluable input and guidance to the process. Review reports are published on the Council's website www.tac.wa.gov.au.

Strategic Review into Third Party Arrangements

Under the Standards, RTOs are required to ensure quality training and assessment within their organisation and scope of registration. This extends to where services are provided on behalf of the RTO. Where third party arrangements exist, these services must be the subject of a written agreement and RTOs are required to notify the Council of any written agreement entered into for the delivery of services on the RTO's behalf.

The Council's 2018-2019 Annual Regulatory Strategy identified third party arrangements as an area of concern. Third parties are persons or organisations providing services on behalf of an RTO for nationally recognised training. Services may include recruitment of prospective learners, marketing, training and assessment and educational support services.

In April 2019 the Council endorsed a Strategic Review into Third Party Arrangements to assess RTO compliance with selected clauses of the Standards for RTOs. The strategic review will inquire into:

- the extent and types of third party arrangements,
- the content and coverage of third party agreements,
- RTO and third party understanding of their obligations to each other, to learners and the Council, and
- learners' understanding of the roles and obligations of both parties, where third parties are providing services on the RTO's behalf.

This strategic review commenced during the reporting period and the findings including recommendations will be reported in 2019-2020.

Marketing and Governance Audit Strategy

A number of State and National reviews identified that RTO marketing practices and governance arrangements were significant factors in the provision of quality training and assessment. The final report of the Marketing and Governance Audit Strategy made three recommendations:

- continued monitoring of RTO compliance with requirements to provide accurate and factual information about products and services (Standard 4) and Fit and Proper Person Requirements (Clause 7.1b)
- expanding Education Program workshops to include requirements in the Standards for RTOs to ensure RTO marketing material is accurate, factual and clearly spells out the rights and obligations of all parties involved
- exploring the potential for development of a new workshop on governance, such as Fit and Proper Person Requirements, business processes and record keeping.

In advancing these recommendations, during the reporting period a new marketing workshop titled: *Is your marketing accessible, accurate and informative?* was developed and delivered, and is expected to be offered regularly.

Preliminary work was commissioned on developing an education program for RTO managers covering Fit and Proper Person Requirements, governance, business processes and record keeping. This workshop is expected to be developed and conducted during 2020.

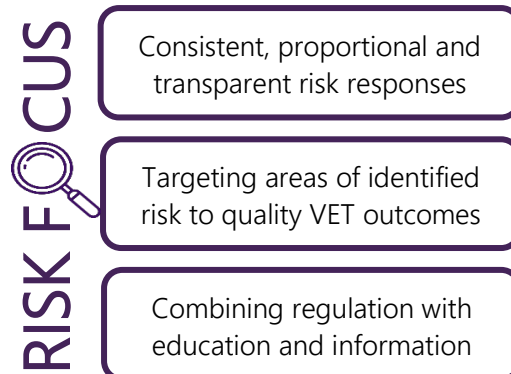
More stringent fit and proper person requirements were introduced during 2018-2019 and processes for changes to ownership and governance resulting from a sale or transfer of an RTO business were reviewed and improved.

3.2.8 Risk Framework

The Council operates in accordance with the *Standards for VET Regulators 2015*, which enables VET Regulators to apply consistent, proportional and transparent responses to different levels of risk affecting the quality of VET outcomes.

Intelligence from the Council’s engagement activities and data from audits and complaints informs risk identification and regulatory responses for managing those risks.

The Risk Framework outlines a range of regulatory responses available to the Council. These vary according to the nature and severity of the risk and their potential impacts.



A key feature of the Council’s risk approach is its commitment to an education program that builds capability and understanding of RTOs and their staff to meet their obligations in regard to the Standards. The Council’s Education Program supports the professional development of VET practitioners and includes information bulletins, Fact Sheets, webinars and face-to-face workshops.

3.2.9 Annual Regulatory Strategy

The Council’s Annual Regulatory Strategy is prepared in line with the Council’s Risk Framework. It is published to inform stakeholders about priorities the Council has identified as posing risks to the quality of VET and the planned regulatory action to monitor and minimise those risks.

During the reporting period, the Council endorsed and published its 2018-2019 Annual Regulatory Strategy. Areas of risk identified in the Strategy, and regulatory action undertaken during the reporting period, are summarised as follows.

Monitoring of systemic issues linked to Training Products

- **Training and Education** – trainers and assessors have a significant impact on the quality of VET outcomes, and qualifications from the Training and Education (TAE) Training Package remain an area of systemic risk.

During 2018-2019 the Council conducted five monitoring and compliance audits of RTOs with qualifications from the TAE Training Package on their scope of registration. Audits focused on appropriate consistency of staffing, resources and facilities, training and assessment strategies, trainer and assessor credentials, vocational competency and industry currency and independent validation of trainer and assessor qualifications.

TAE qualifications continued to be included on the list of exempt qualifications for the Council’s Compliance Recognition Program.

- **Health and Community Services** – ongoing industry concerns and significant changes to the Training Package means this industry sector has continued to be an area of risk focus for the Council. RTOs seeking to add or amend their scope of registration to include the CHC33015 Certificate III in Individual Support, CHC30113 Certificate III in Early Childhood Education and Care and CHC50113 Diploma of Early childhood and Care qualifications were subject to a site audit. These qualifications are also included on the list of exempt qualifications for the Compliance Recognition Program.

During 2018-2019, 15 RTOs delivering health and community services training products including First Aid units, Early Childhood and Care and Disability Support qualifications were audited.

- **Units of competency leading to the issuance of High Risk Work Licenses (HRWL)** – these high risk licencing units are used in many industries including in construction, electricity supply, manufacturing, transport and logistics and mining. In September 2018, 13 reviewed HRWL units linked to the operation of forklift trucks, elevating work platforms and various types of cranes were endorsed. Eight RTOs were subject to site audits relating to HRWL units during the reporting period.
- **Units of competency leading to the issuance of the 'White Card'** – the unit 'CPCCWHS1001 Prepare to work safely in the construction industry' is linked to the Construction Induction Training (White) Card. The Safe Work Australia report on the model Work Health and Safety Laws (December 2018) found that industry and regulator confidence in the White Card continues to diminish due to concerns about duration and content of training, online delivery and validation of identity of cardholders.

The Council maintained its focus on the unit and four Renewal of Registration applications that included CPCCWHS1001 on the scope of registration were audited.

- **Heavy Vehicle training** – the Council recommended monitoring audits of RTOs delivering units of competency leading to the three classes of heavy vehicle licences, and applications to add heavy vehicle units to an RTO's scope of registration would be subject to a site audit.

During 2018-2019 research and data analysis, including consultations with the industry regulator and the WA industry training council, was undertaken as part of the audit scoping process. These monitoring audits are planned for the second half of 2019 and outcomes will be reported in 2020.

Monitoring of systemic issues linked to the Standards for RTOs

- **Amount of Training (Clauses 1.1 and 1.2)** – this remained an ongoing area of risk to quality VET outcomes and Council agreed to include Clauses 1.1 and 1.2 of the Standards for RTOs in the scope of all audits conducted. Outcomes of the audits conducted during the reporting period indicate that issues with amount of training persist. Education Program workshops on assessment conducted during the year were highly subscribed and included topics on amount of training.

The Council's Fact Sheet on Amount of Training was updated in July 2018 to include more information on terminology and common misunderstandings and challenges involved in determining an amount of training that is appropriate for a learner.

- **RTO Marketing Practices (Clauses 4.1, 5.2 and 5.3)** – implementation of recommendations from the 2017 Marketing and Governance Audit Strategy led to the development and delivery of a new marketing workshop titled: *Is your marketing accessible, accurate and informative?*

Audit activity during 2018-2019 indicated improved compliance with the clauses relating to marketing, however increasing issues were noted in relation to provision of information relating to third party involvement in training and delivery services.

- **RTO Governance (Clauses 7.1 and 7.2)** – the 2017 Marketing and Governance Audit Strategy revealed 32% of RTOs audited were non-compliant with some aspects of the fit and proper person requirements. In August and October 2018 Council introduced more stringent fit and proper person requirements for new entrants to the training market and current RTOs seeking renewal of registration. These requirements also aimed to ensure RTOs are appropriately invested with the facilities, resources and staffing to deliver quality training outcomes.

Current processes requiring RTOs to inform the Council about changes to ownership and governance resulting from a sale or transfer of RTO ownership were reviewed to ensure timely advice and submission of up to date fit and proper person declarations that reflect the changes.

Preliminary research was also commissioned towards the development of a workshop for RTO managers covering Fit and Proper Person Requirements, governance, business processes and record keeping. This workshop is expected to be developed and conducted during 2020.

- **Assessment Practices (Clause 1.8)** - ongoing concerns about workplace assessment, online assessment and Recognition of Prior Learning (RPL) resulted in a focus on assessment during 2018-2019. This applied to all applicable audits undertaken during the reporting period. Assessment has also featured heavily in the Education Programs offered during the reporting period.
- **Third Party Arrangements (Clauses 2.1, 4.1e and f, 5.2b, c and d)** – third party arrangements enable RTOs to expand their offerings to a wider market, however, they also carry an increased risk of poor training outcomes if they are not effectively managed.

The Strategic Review endorsed by Council in April 2019 commenced during 2018-2019, and the findings and recommendations will be reported in 2020.

VET delivered in Secondary Schools

The Council continued to focus on issues linked to VET delivery in secondary schools. Key issues for this VET pathway during 2018-2019 included vocational competency and industry currency of teachers delivering VET qualifications, partnership arrangements and timely certification to students on completion of training.

The Council Secretariat worked with the Department of Education to develop requirements for a panel of preferred providers for RTOs seeking to deliver VET to publicly funded secondary schools. Work is also underway for the establishment of a Memorandum of Understanding with the Department of Education for collaboration and information sharing on VET delivered in secondary schools.

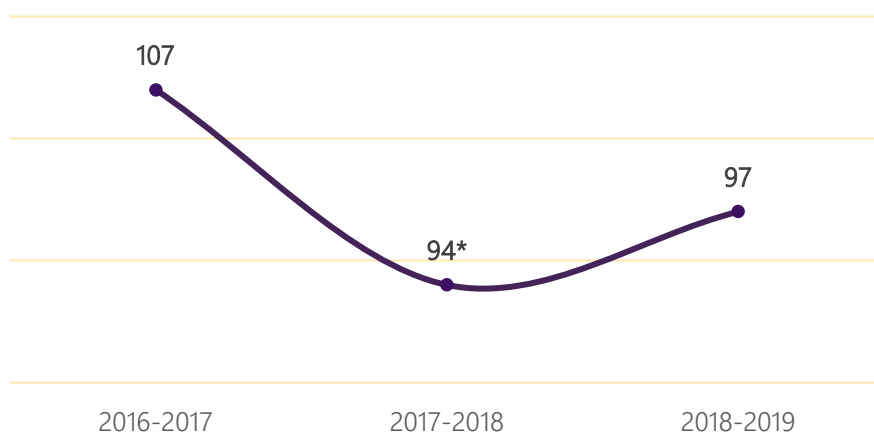


Although the Council's Regulatory Strategy is published, risks are identified and actioned by the Council on an ongoing basis. New areas of risk that emerge following publication of the Regulatory Strategy are considered and appropriate regulatory responses to those risks are conveyed to stakeholders via the Council's established communication strategies, which include the Council's website and the TAC Special Bulletin.

3.2.10 Course Accreditation

Accredited courses are intended to fill gaps in national training packages. At 30 June 2019 there were **97** accredited courses in Western Australia and the figure below provides the number of accredited courses for the current and previous reporting periods.

Figure 15: Number of accredited courses

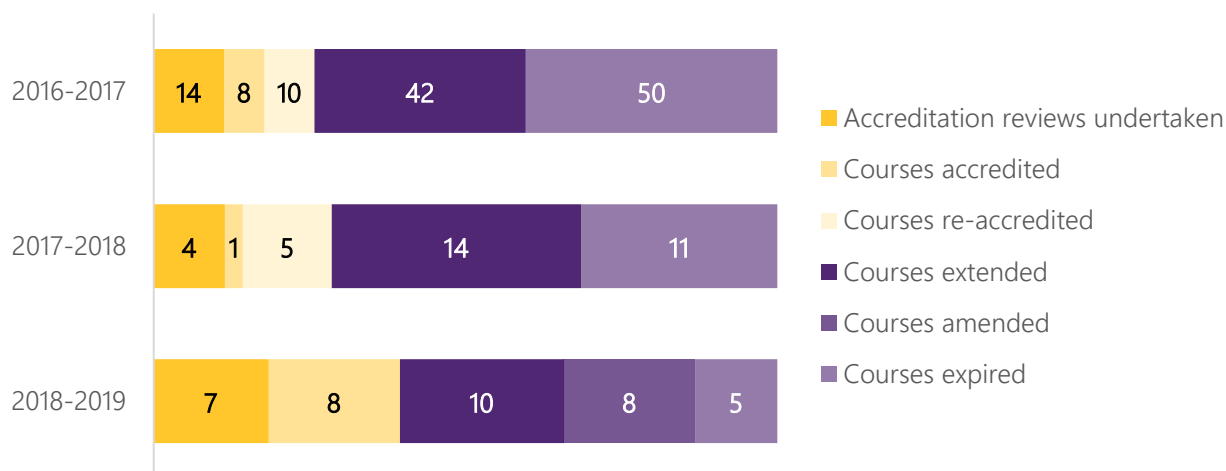


*Note: data for the 2017-2018 period has been amended to reflect revised total accredited courses from 95 to 94.

During the reporting period the Council considered and approved a total of **18** course accreditation applications. These included **eight** applications for accreditation of a new course and **10** applications for extension of accreditation. Of the **five** courses that expired during 2018-2019, none were reaccredited.

Figure 15 summarises accreditation activity undertaken in the reporting period.

Figure 16: Accreditation activity



The table below sets out the outcome of each accreditation review undertaken against the AQTF2007 Standards for Accredited Courses during the reporting period.

Table 4: Outcome of accreditation reviews (main review)

Review outcome	30 June 2017	30 June 2018	30 June 2019
Compliant	14	4	7
Non-compliant	0	0	0
TOTAL	14	4	7

Accreditation reviews are undertaken when a course owner submits an application for course accreditation, course re-accreditation or, in some cases, course amendment.

In line with Council processes, if the outcome of the initial review is non-compliance, the applicant is given an opportunity to provide evidence during an evidence review period of 20 working days.

All accreditation reviews undertaken during the reporting period demonstrated compliance at review.

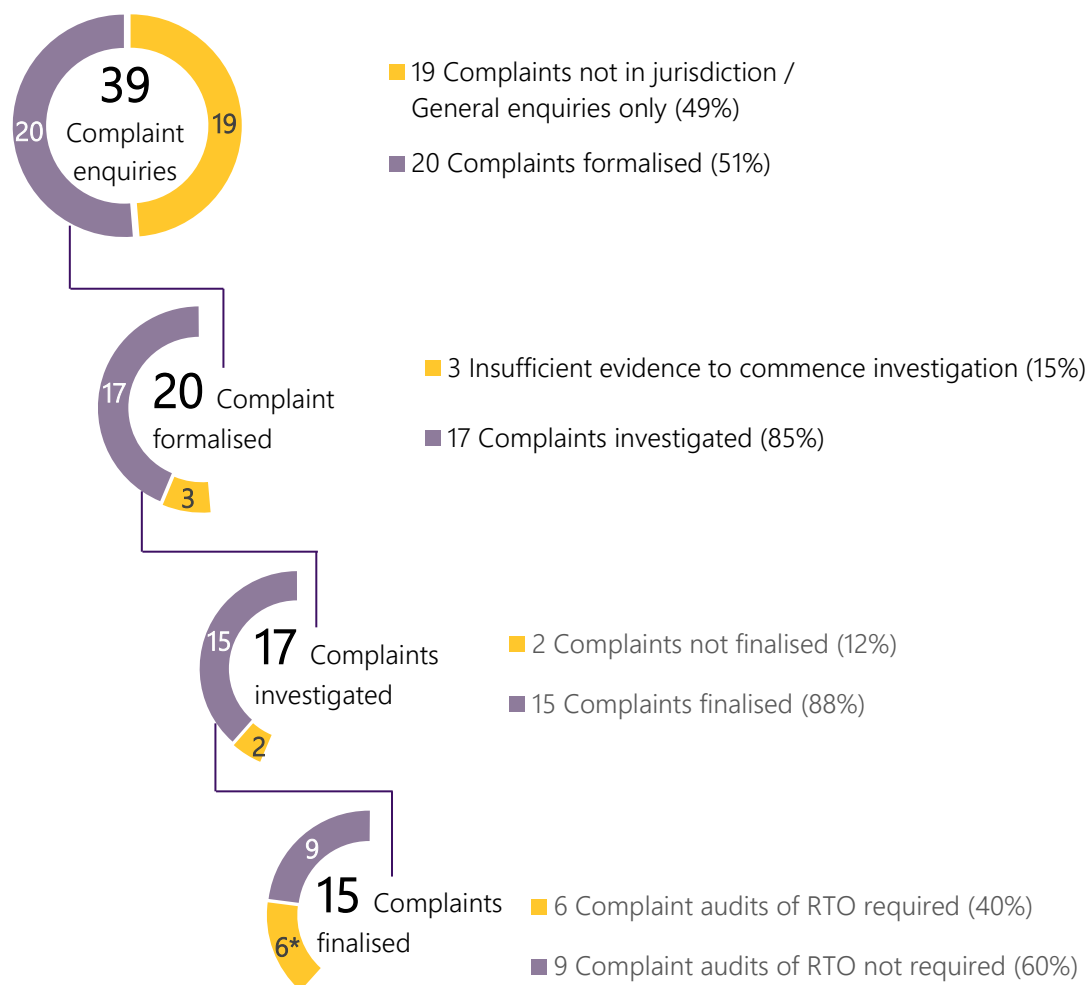
3.2.11 Complaint Management

A requirement under the VET Act and the *Standards for VET Regulators 2015* is that the Council implements a policy to manage and respond to stakeholder complaints. The Council can only investigate complaints if they relate to the ongoing compliance by RTOs with the Standards for RTOs and the VET Act.

Complaints are handled in accordance with the Council's policy which is available on the Council's website www.tac.wa.gov.au.

During 2018-2019, the Council's complaints management included a total of **39** complaint enquiries. Of these, **19** were not in jurisdiction or considered enquiries only and **20** complaints were formalised. **Two** additional complaints were carried over from the previous reporting period and were not included in the 2018-2019 activity data. Provided in Figure 17 is an overview of complaints management for the reporting period.

Figure 17: Complaints activity



* Of the 6 complaint audits that were required, 3 complaint audits relate to one RTO whereas the remaining 3 complaint audits relates to 3 other RTOs respectively.

The table below provides a breakdown of complaints formalised by type of complaint.

Table 5: Complaint activity as at 30 June 2019

Complaints	30 June 2017	30 June 2018	30 June 2019
Complaints about RTOs	29	25	20
Complaints against TAC processes and services or against individual officers	0	1	0

A complaint may include issues associated with more than one clause in the Standards for RTOs. The highest number of formalised complaints received (12 complaints) relate to Standard 1 in relation to the RTO’s training and assessment strategies and practices and meeting training package or accredited course requirements.

Nine complaints were received relating to Standard 5 that specifies learners are properly informed prior to enrolment and protected via the provision of current, accurate information that enables effective decisions about training needs.

Six complaints were received in relation to Standard 6 that specifies an RTO must implement a transparent complaints and appeals process supported by policy for dealing with learner and client complaints.

In addition, five complaints were received regarding Standard 4 that specifies the provision of accurate and factual information with regard to RTO services. A further five complaints related to organisations purporting to be RTOs (VET Act). The table below provides an overview of complaints received by the Standards.

Table 6: Complaints formalised by Standards and VET Act

<i>Standards for RTOs</i>		Number of formalised complaints
Standard 1	training and assessment strategies and practices are responsive to industry and learner needs and meet training package and accredited course requirements	12
Standard 2	RTO operations are quality assured	2
Standard 3	AQF certification is issued, maintained and accepted and learners have access to records	2
Standard 4	RTOs information is accurate and accessible with its services and performance available to inform learners and clients	5
Standard 5	each learner is properly informed and protected	9
Standard 6	complaints and appeals are recorded, acknowledged and dealt with fairly, efficiently and effectively	6
Standard 7	there are effective governance and administration arrangements in place	0
Standard 8	RTO co-operates with the VET regulator and is legally compliant at all times	2
<i>Vocational Education and Training Act 1996</i>		
Section 58A		5

Complaints management is an integral component of the Council’s Risk Framework and the data collected from complaints helps to inform consideration to areas of highest risk and appropriate regulatory responses on an ongoing basis.

3.3 REDUCING REGULATORY REQUIREMENTS

The Council is committed to ensuring a risk centred approach to regulation that minimises risk to the training sector while actively working to reduce regulatory burden for RTOs. During the 2018-2019 reporting period the Council progressed several initiatives to help reduce regulatory requirements for RTOs.

3.3.1 Compliance Recognition Program

The Council has a strong commitment to reducing the regulatory burden for providers that consistently demonstrate compliance with the requirements for RTOs in Western Australia. The Council's Compliance Recognition Program (CR Program) was introduced in May 2015 and is designed to provide RTOs that consistently demonstrate compliance a degree of flexibility by removing the requirement for RTOs to submit applications or fees to the Council for amendment activity to their scope of registration.

The CR Program is premised on the basis that the RTO has undertaken an internal verification process to determine that training products meet compliance with the Standards, AQF and requirements of registration as an RTO under the VET Act. The Council retains the overall authority to approve the amendment.

Compliance
Recognition
Program –
5 RTOs



The granting of participation in the CR Program by the Council does not indicate or imply that the RTO is of a higher standard or of a lower risk than other RTOs.

Having met necessary entry requirements, five RTOs maintained CR program status as at 30 June 2019.

During 2018-2019 the Council's Secretariat commenced a review of the CR program focusing on the effectiveness and uptake of the program and potential improvements. The review is expected to be finalised in 2019-2020.

3.3.2 Replacement of equivalent training package products

The Council in collaboration with other VET Regulators implements, as part of its commitment to reduce regulatory burden and minimise risk to the VET sector, that equivalent training package products (qualifications and/or units of competency) are automatically added to RTOs' scope of registration without requiring an application or a fee.

During the 2018-2019 period **421** amendments were processed by the Council through the replacement of equivalent training package products process.

4. COMMUNICATION AND INFORMATION - Key Priority 2

Outcome Indicators

The Council's success in achieving Key Priority 2 is demonstrated by the extent to which the following indicator has been achieved:

Outcome

The Council effectively communicates and provides an educative service on its functions to stakeholders and gathers appropriate information to enhance its regulatory functions.

Work undertaken by the Council to progress this priority and to achieve Key Priority 2 is detailed as follows.

4.1 EDUCATION PROGRAM AND DEVELOPMENT OPPORTUNITIES

The Council's Risk Framework and Regulatory Strategy detail the Council's commitment to an Education Program as an important strategy to encourage and promote compliance.

The Council's Education Program in 2018-2019 proved highly successful with **428** participants attending workshops either in person or online. The Education Program continued to offer these workshops free of charge, through a variety of mediums including practical face to face workshops and online webinar presentations facilitating State-wide participation.

The Education Program topics are selected following consideration of a broad range of information, including:

- audit outcomes
- data analysis and stakeholder engagement activity
- the Council's environmental scan and trending areas of concern
- complaint information
- feedback from participants in Education Program workshops.

Post workshop surveys undertaken with participants indicated a high level of satisfaction with delivery mode, topic selection and the areas of focus in the 2018-2019 Education Program. The feedback indicated significant support on the effectiveness of the Education Program in increasing the capability and understanding of participants in relation to the role of the Council and in meeting the requirements of the Standards for RTOs.

Education Program initiatives undertaken during the reporting period included:

9

Nine workshops were conducted providing RTOs with practical information to support compliance practices against the Standards for RTOs. Target areas included marketing, design and development of an assessment system and assessment validation. A total of 353 participants attended the education workshops in person or via webinar, and all workshops were made available on the Council's website.

6

Six webinars were conducted covering topics such as *'The Audit Experience, The Accreditation Process'* and information about *Becoming an RTO'*. All webinar sessions were recorded and made available on the Council's website.



The Council's website is updated regularly to include relevant and up-to-date information related to the Standards for RTOs including support and guidance material, resources and relevant web links.

2

TAC Fact Sheets provide training providers with guidance about the Standards for RTOs. Two new Fact Sheets were published on *'Identifying and meeting learner needs'* and *'Assuring the quality of RTO processes, practices and products'*.

16

The Council regularly publishes information about the Standards for RTOs and the Council's regulatory approach via electronic newsletters distributed to RTOs and key stakeholders. Newsletter publications include the TAC Update and TAC Special Bulletins. During 2018-2019, the Council published and distributed 6 TAC Updates and 10 TAC Special Bulletins.



In November 2018, the presentation *'The Audit experience: Facts and Fiction'* was delivered at the Department of Training and Workforce Development's 'Summer Shorts' professional development program.

The Council's Education Program will continue to be a key focus during 2019-2020 with the Council continuing to consult and engage with stakeholders to inform the provision of relevant education development opportunities and resource delivery that supports RTO business improvement and compliance practices.

4.2 COMMUNICATIONS WITH CLIENTS AND STAKEHOLDERS

4.2.1 Report on Council Activities

The Snapshot of Activities report is produced by the Council every six months, reporting on the previous six months activity and highlights the Council's regulatory activities in accordance with its functions under the VET Act and the Standards.

The Snapshot of Activities report is published via the Council's website.

4.2.2 Provision of Consumer Information

The Council actively provides information to its clients and stakeholders, including guidance material to promote and support the delivery of quality services in the sector.

TAC Website

The website is the Council's major communication portal and the most frequently accessed information and communication tool. The website contains all Council policy and key documentation in relation to the Standards for RTOs, course accreditation and other key information relevant to the sector and its stakeholders.

The Council's website includes access to the RTO Portal, registration and course accreditation application forms, complaints handling information and forms, published newsletters and a vast selection of information and guidance material. The website also includes details about professional development opportunities offered through the Council's Education Program.

TAC Newsletters

The Council continues to produce regular newsletters, the TAC Update and TAC Special Bulletins, as required. These two communication tools outline key information to RTOs and other stakeholders including State and national VET policy direction, VET regulatory process matters and on-going reminders to key stakeholders about mandatory reporting requirements. The newsletters are emailed to RTOs, key stakeholders and subscribers and are available electronically on the Council's website.

Western Australian Training Awards

The Council continues to support the Western Australian Training Awards through its sponsorship of the 'Trainer of the Year Award'. Given the Council's functions under the VET Act, sponsorship of this award reinforces the Council's on-going commitment to recognising quality training and assessment in the VET sector.



Sponsored 2018
'Trainer of the Year'
WA Training Awards

RTOPortal

In October 2017, the Council launched a new electronic client management system, RTOPortal, to replace the previous system RTONet. RTOPortal provides RTOs with direct access to information linked to their registration.

RTOs can view their registration details with the Council including their contact details and scope of delivery. RTOs must submit applications through the portal and are able to track the progress of their application through the system.

Organisations intending to become an RTO can gain access to the system in order to lodge an initial registration application.

4.3 FEEDBACK FROM RTOs AND STAKEHOLDERS

A key priority of the 2017-2020 Business Plan requires that the Council communicates effectively, provides an educative service on its functions to stakeholders and gathers appropriate information to enhance its regulatory functions. One of the identified strategies is that the Council considers stakeholder feedback to inform its regulatory services and functions and that Council gathers reliable data to measure its performance and inform its planning, policies and services.

The *Standards for VET Regulators 2015* also requires VET regulators to evaluate and improve their regulatory performance in regulating RTOs and accrediting courses.

2018 Council survey of RTOs and Stakeholder Perceptions of Performance

The Council conducts surveys on a biennial basis. Information gained from RTOs and VET stakeholders is a key source of data and feedback to inform ongoing review and improvements, and in October 2018 the Council finalised the fourth survey of its RTOs and stakeholders.

The survey was undertaken by a Western Australian based organisation and was conducted between June and July 2018, consisting of two separate surveys undertaken concurrently - one targeting RTOs and the other on stakeholder feedback. Responses were received from 140 RTOs and 26 stakeholders.

As part of the development of the 2018 surveys a comprehensive review was undertaken resulting in a significant revamp of the survey questions, including a reduction in the number of questions and a more streamlined survey approach with less time required for participants to complete.

84% of RTOs and stakeholders rated Council's performance as 'good' or 'excellent'



Provided below is an overview of the survey's findings:

- **Overall responses**
 - Perceptions of Council's performance by both RTOs and stakeholders was positive with 84% of RTOs and stakeholders rating Council's performance as 'good' or 'excellent'.
 - Council's communication with RTOs and stakeholders was rated very positive with 85% of stakeholders and 93% of RTOs rating communication as 'good' or 'excellent'.
- **RTO feedback**
 - The Council continues to record a high level of satisfaction. Areas for improvement were generally limited to the need for consistency in advice provided (including auditor consistency), timeliness in responses, and the Council's website.
 - As a result of the 2017 Marketing and Governance Audit Strategy, all RTOs were subject to a Council audit during the 12 month period and the overall response from RTOs was very positive, with 88% of respondents indicating the audits were worthwhile experiences.
- **Stakeholder feedback**
 - Stakeholder ratings were generally good with stakeholder comments indicating their relationship with Council less satisfying than compared with RTO interactions with Council. Stakeholder perceptions of Council received lower ratings in areas including: 'provides timely and quality advice about the VET sector to my organisation'; 'acts on stakeholder feedback'; and 'acts on complaints about its own performance'.
- **Education Program**
 - RTOs were asked to suggest topics they would like considered as part of the Council's Education Program and over 87 responses were received covering a broad range of topics. The topics suggested included the application of the Standards; compliance; audit preparation; RTO management/professional development; and updates on the Standards/State and national issues. This feedback has assisted the Council to determine future professional development opportunities and priorities.

The outcomes from the survey have been used to help focus priorities over the short to medium term and support Council's ongoing commitment to continually improve its systems and regulatory practices. In particular, the survey outcomes have contributed to the development of the Council's regulatory strategy and helped shaped the Council's Education Program.

The Council will conduct its next surveys of RTOs and Stakeholders in 2020 and as part of the development process a review of the survey tools will be undertaken with an emphasis on the current approach to obtaining stakeholder feedback.

Feedback from RTOs following audit

In addition to the Council's external stakeholder survey, further feedback is collected from a number of sources. This includes feedback from RTOs via audit surveys, direct contact with key stakeholders, the Council's complaints handling process and auditor feedback.

This feedback is incorporated into the Council's continuous improvement processes and is reported on a biannual basis.

The Council collects feedback from RTOs following completion of site audits during the initial and renewal of registration process. The data collected during the 2018-2019 reporting period highlighted that **100%** of respondents found that the audit process added value to their business, the same as the 2017-2018 reporting period figure.

In addition, **100%** of respondents indicated that the information provided pre-audit and during the audit by the Council met their needs and **89%** indicated that they were satisfied, to very satisfied, with the overall audit process.

5. COLLABORATION AND ENGAGEMENT - Key Priority 3

Outcome Indicators

The Council's success in achieving Key Priority 3 is demonstrated by the extent to which the following indicator has been achieved:

Outcome

Council collaborates with stakeholders in the provision of VET regulatory and educative services to ensure confidence in VET outcomes.

Work undertaken by the Council to progress and achieve Key Priority 3 is detailed as follows.

5.1 ENGAGEMENT WITH STAKEHOLDERS

Engagement with stakeholders is a key component of the Council's Business Plan and Risk Framework. The intelligence gathered through stakeholder engagement ensures appropriate and timely regulatory responses are identified to address problems within the Western Australian VET sector. Collaboration and consultation between the three VET Regulators ensures VET regulatory issues are discussed and moderated to improve national consistency.

The Council continued to engage with stakeholders to develop and strengthen information sharing opportunities. During the reporting period, approximately **69** formal meetings were undertaken with various stakeholders including WA Industry Training Councils, Skills Service Organisations, VET and Industry Regulators, State and Australian Government agencies, industry associations and RTOs.

ENGAGEMENT ACTIVITIES

69 formal meetings



Key stakeholder engagement included:

- consultation with Technical Advisors to provide advice on current industry, regulatory or workplace requirements. Technical Advisors are consulted by Auditors and Secretariat staff when required to ensure that RTO strategies for training and assessment meet industry requirements
- regular discussions with the WA Industry Training Council network to identify areas of systemic risk and assist in the finalisation of the Council's Regulatory Strategy
- industry regulators were consulted to inform the Council's Regulatory Strategy and consider industry specific issues in qualifications and units of competency linked to licensed outcomes such as maritime, gas, heavy vehicle, high risk work licenses and the Construction Induction Training (White) Card

- industry associations and peak organisations were consulted and identified concerns related to quality of training delivery, assessment and amount of training
- establishing and maintaining Memoranda of Understanding (MOU) to formalise information sharing protocols with key stakeholders including VET Regulators, Industry Regulators, Department of Transport and Department of Training and Workforce Development were finalised
- Skills Service Organisations to discuss Training Package review and development and issues which impact on VET regulation and the implementation of the training package.

5.2 PARTICIPATION AT A STATE AND NATIONAL LEVEL

During 2018-2019, the Council continued to work collaboratively with the State and Australian Governments, VET Regulators and national stakeholders in the regulation and development of the VET sector. The Council participates in tri-partisan meetings between VET Regulators and the Department of Training and Workforce Development to discuss issues relevant to each stakeholder.

Working with other VET Regulators

The Council continued to engage with ASQA and the Victorian Registration and Qualifications Authority (VRQA). VET Regulators met formally three times during the reporting period to discuss issues such as the review of the *National Vocational Education and Training Regulator Act 2011*, entry requirements for new training organisations entering the market, Training and Education Training Package requirements, strategic reviews and proposed changes to ASQA's fees and charges. Additional meetings occurred during the reporting period to discuss the AQTF2007 Standards for Accredited Courses.



Government agency interactions

Engagement with State and Australian Government agencies is critical to the development and progression of VET policy issues. As a key VET stakeholder, the Council continued to provide input into strategic policy matters including:

- review of the *National Vocational Education and Training Regulator Act 2011*
- review of the Australian Qualifications Framework
- Strengthening Skills - The Expert Review of Australia's Vocational Education and Training System by the Hon Steven Joyce
- review of the Alignment between the Standards for VET Accredited Courses and the Standards for Training Packages
- Training Package development program
- review of VET data requirements.

Discussions were also undertaken with State government agencies including WA Police Force, Department of Mines, Industry Regulation and Safety (WorkSafe and EnergySafety) and the Department of Transport in progressing industry related matters affecting the delivery and assessment of VET training products.

The Council has continued to strengthen relationships with the Department of Education by assisting in the development of a Common Use Arrangement for RTOs seeking to deliver VET in secondary schools under auspice arrangements with schools. A MoU has been under development between the Council and the Department of Education to cement information sharing protocols and will be finalised during 2019-2020.

The Council's working relationship with the Department of Training and Workforce Development is pivotal to matters affecting Western Australia's public VET policy including public funding, information sharing in relation to areas of risk to the sector, professional development opportunities and Training Package implementation. While the process for review and development of training products is managed by the Australian Government, advice is often sought where decisions intersect or impact on VET regulatory activities and the requirements of the Standards for RTOs.

Input into other strategic government initiatives

The Council will, from time to time, be invited to provide input or make submissions in response to various government reviews. During the reporting period the Council participated in the following State government review:

- Economic Regulation Authority (ERA) Inquiry into Reform of Business Licensing in Western Australia – the ERA inquiry focused on State Government licences and covered a broad range of licences needed to operate a business or work in an occupation. The inquiry identified business licences related to the operation of the Council linked to the registration of RTOs and the accreditation of VET courses. During 2018 Council actively participated in the inquiry including the provision of feedback on the draft report and inquiry outcomes, relevant to the Council.

6. QUALITY PROCESSES AND SERVICES - Key Priority 4

Outcome Indicator

The Council's success in achieving Key Priority 4 is demonstrated by the extent to which the following indicator has been achieved:

Outcome The Council delivers consistent and transparent processes and services.

Work undertaken by the Council to achieve Key Priority 4 is detailed as follows.

6.1 REVIEW OF COUNCIL OPERATIONS AND PROCESSES

As part of its role in supporting the business of the Council, the Council's Secretariat maintains a quality system that underpins the day to day operations and processes of the Council. The quality system is designed to support the Council's functions as a VET Regulator and ensure compliance with a range of State and national requirements.



During the reporting period, a number of documents in the quality system were reviewed, either to reflect regulatory changes or for continuous improvement purposes or to reflect the Council's Secretariat's transfer from the Department of Education to the Department of Training and Workforce Development.

The Council continually monitors the sector in line with its risk management approach. This led to the introduction of new registration requirements for new entrants to the training market. The new requirements aim to ensure new providers are well placed to provide quality training and assessment services. Changes to initial registration applications has resulted in some adjustments to renewal of registration and amendment to registration application processes. The changes were implemented during the reporting period and included the introduction of a new self-assessment tool and Fit and Proper Person Declaration.

The Council monitors the implementation of operational processes and procedures on an ongoing basis with refinements made as and when required.

During the reporting period the Council moved to providing all communication electronically. From 1 June 2019, the Council's Secretariat began emailing all correspondence to RTOs, with the exceptions of hard copies being posted for certificates and when Council applies a sanction against an RTO's registration.

The Council conducted a review of its course accreditation arrangements. The purpose of the review was to improve aspects of course accreditation processes, with a focus on providing course developers and course owners with further guidance and clarification in regards to industry support for accredited courses, course monitoring and evaluation and use of modules.

The Council's Secretariat completed the Accredited Course Transparency Project with the national VET register (training.gov.au) updated to include the titles and codes of units of competency and modules, as well as a brief description of the course.

The completion of the project increases the transparency of accredited course, enables Unique Student Identifier (USI) transcripts to include information on units of competency/modules and improves the information available on the My Skills website (www.myskills.gov.au), which will enable prospective students and employers to better understand course content and suitability.

6.2 APPEALS AGAINST COUNCIL DECISIONS

During the 2018-2019 reporting period the Council's policies and procedures were tested through the lodgement of an appeal by an RTO impacted by a Council decision.

Under the requirements of section 58G of the VET Act, RTOs can appeal against Council decisions. Appeals must be lodged with the State Training Board in line with established processes. During the reporting period the Council, in line with the Standards and the VET legislation, made a range of decisions concerning RTO registration including the cancellation of two RTOs and the variation of one RTO's registration. The Council also rejected two applications for amendment to registration and cancelled an Australian Qualifications Framework certification conferred to a student on the basis of misleading information.

As a result of one of the RTO registration cancellations, an appeal was lodged with the State Training Board against the decision of the Council. The State Training Board disallowed the appeal on the basis that the appeal did not meet the conditions required by section 58G of the VET Act.

7. APPENDIX 1 – Acronyms

AQF	Australian Qualifications Framework
CISC	COAG Industry and Skills Council
COAG	Council of Australian Governments
DoE	Department of Education
DTWD	Department of Training and Workforce Development
RTO	Registered Training Organisation
TAC	Training Accreditation Council
VET	Vocational Education and Training