



Training Accreditation Council
WESTERN AUSTRALIA

RTO Third Party Arrangements

Strategic review into third party
arrangements entered into by
Registered Training Organisations

This report is version 1.2, ref: D20/0025237 of the Training Accreditation Council's Strategic Review into Third Party Arrangements.

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TABLE OF CONTENTS

1	EXECUTIVE SUMMARY.....	1
1.1	Introduction.....	1
1.2	Key findings	1
1.3	Recommendations	2
2	INTRODUCTION.....	3
2.1	Risk-based regulation.....	3
2.2	Strategic review into third party arrangements.....	3
2.3	Objectives of the review	4
3	STRATEGIC REVIEW	5
3.1	Methodology and scope.....	5
3.2	Audit criteria and scope.....	6
3.3	Demographics of RTOs in the audit sample:.....	7
3.4	Stakeholder surveys.....	7
4	THIRD PARTY ARRANGEMENTS.....	8
4.1	Role of third parties in VET outcomes	8
4.2	Types of third party arrangements established by RTOs.....	8
4.3	Coverage of third party agreements.....	9
5	RTO ENGAGEMENT WITH THIRD PARTIES.....	11
5.1	RTO understanding of third party arrangements.....	11
5.2	Benefits and challenges of third party arrangements.....	11
5.3	RTO monitoring of third parties.....	12
6	THIRD PARTY ENGAGEMENT WITH RTOS.....	14
6.1	Third party respondents	14
6.2	Third party agreements	15
6.3	Third party awareness of RTO obligations	15
6.4	Communication with RTOs.....	16
6.5	Third parties’ previous involvement in VET	16
6.6	Services provided by third parties for RTOs.....	16

7	LEARNERS' EXPERIENCES WITH THIRD PARTY ARRANGEMENTS.....	18
7.1	Information about third party involvement in training.....	18
7.2	Pre-enrolment information.....	19
7.3	Enrolment and training delivery.....	20
7.4	Payment of fees.....	20
7.5	Certification.....	21
8	RTO COMPLIANCE WITH THE STANDARDS FOR RTOS.....	22
8.1	Standards for RTOs audited in strategic review.....	22
8.2	Overall compliance.....	23
8.3	Areas of highest compliance.....	25
8.4	Areas of lowest compliance.....	26
8.5	Compliance with each element of the Standards for RTOs.....	27
9	FINDINGS AND RECOMMENDATIONS	32
9.1	Findings.....	32
9.2	Recommendations	33
10	ATTACHMENTS.....	35

1 EXECUTIVE SUMMARY

1.1 Introduction

Strategic reviews enable an in-depth analysis of systemic issues affecting the quality of VET and enable the Training Accreditation Council (the Council) to inquire into and formulate evidence-based regulatory responses.

This inquiry into third party partnerships established by RTOs followed concerns identified in the Council's 2018 environmental scan including RTOs not notifying the Council about third party arrangements, limited RTO understanding of what constitutes a third party arrangement and an apparent lack of formalised agreements between RTOs and their third parties.

The *Standards for Registered Training Organisations (RTOs) 2015* (Standards) define a third party as any party that provides services on behalf of the RTO, with the exception of services provided under a contract of employment between an RTO and its employees. Clause 8.3 of the Standards requires RTOs to notify the VET regulator of any written agreement entered into for the delivery of services on its behalf.

The Strategic Review included an educational component. More than six months before the audits, an information campaign was conducted informing RTOs and stakeholders of the review into third parties. The advance communication aimed to prompt RTOs to review their third party arrangements and sought to educate RTOs about what constituted a third party arrangement, the range of services that could be provided by third parties and services excluded from the definition of a third party service. A notable result was a 30% increase in notifications by RTOs reporting third party arrangements.

In line with the Council's risk based regulatory approach, the review involved a combination of site and desktop audits. Student views were also sought through an online survey.

The review has confirmed the use of third parties is significant. Third parties play a major and critical role in VET outcomes and they are to be valued as major stakeholders for the regulation of the sector.

RTOs and third parties are to be commended for the high level of co-operation with the Council for this Strategic Review.

1.2 Key findings

- The Strategic Review confirmed initial views about the prevalence of RTO use of third party arrangements. There are significantly more third parties involved in VET delivery than there are RTOs regulated by the Council. The 29 RTOs audited as part of the review recorded 219 third party agreements between them, averaging about seven agreements per RTO.
- Training and assessment were the services most commonly outsourced by RTOs to third parties.

- RTOs reported the main reasons for outsourcing include opportunities to expand operations to more learners and locations, access to facilities and specialised equipment, marketing and recruitment expertise and educational support services.
- RTOs with large numbers of third party arrangements reported their main challenges as working out roles and responsibilities and monitoring the third party to ensure products and services are delivered as agreed.
- RTOs demonstrated high levels of compliance with the Standards relating to third party arrangements.
- Almost a quarter of the RTOs audited were non-compliant with the requirement to inform prospective learners about refund arrangements in the event of RTO or third party closure or failure to deliver the agreed service. Learner respondents to survey questions about refunds corroborated this audit finding.
- Data on learners engaged in training and assessment involving third parties, including enrolments, completions, qualifications and pathways, is needed to assess potential risks to learners, clients and industry if the partnerships are not effectively managed.

1.3 Recommendations

1. The Council explore strategies for provision of education and guidance, including:
 - a. education workshops and guidance material targeted specifically to third parties,
 - b. inclusion of third party contacts for electronic mail-outs of the *TAC Update* newsletter and *TAC Special Bulletins*,
 - c. information for RTOs on strategies for managing third party arrangements drawn from the good examples noted in the third party agreements reviewed,
 - d. guidance for RTOs on information to prospective learners on refunds in the event of third party closure or failure to deliver services, and
 - e. reminders to RTOs of their obligation to notify the Council of commencements and cessations of third party arrangements they enter into.
2. Strategies are considered to enhance the regulation and risk management of RTOs who rely on third party arrangements. This may include investigating options for collection and analysis of student data to assess the risks and impact on learners, clients and industry if the third party arrangements are deficient.
3. The Third Party Register is reviewed to determine additional information required to be captured to ensure the Register is current and accurate at all times.
4. RTOs continue to be monitored for compliance by ensuring clauses in the Standards relating to third parties are included in future audits.

2 INTRODUCTION

2.1 Risk-based regulation

The Training Accreditation Council (the Council) is Western Australia's registering and course accrediting body. The Council is an independent statutory body responsible for the quality assurance of vocational education and training (VET) services in WA.

The Council has a risk-based approach to regulation that applies appropriate and proportionate responses to manage provider and systemic risks to the quality of VET. Audits and the provision of education and guidance support this regulatory approach.

Audits of individual registered training organisations (RTOs) offer a point-in-time insight into the quality of training and assessment services provided by the RTOs and assess their compliance with the *Standards for Registered Training Organisations (RTOs) 2015* (the Standards).

Strategic reviews provide for an in-depth analysis of systemic issues affecting the quality of VET and enable the Council to inquire into and formulate evidence-based responses to systemic issues.

2.2 Strategic review into third party arrangements

The Standards define a third party as any party that provides services on behalf of the RTO, with the exception of services provided under a contract of employment between an RTO and its employees.

An RTO that engages the services of a third party is accountable for compliance with the Standards. This means:

- ensuring there is a written agreement for services provided on its behalf by the third party (Clause 2.3),
- allocating sufficient strategies and resources to systematically monitor services delivered on its behalf to ensure the third party complies with the Standards at all times (Clause 2.4),
- informing prospective learners, prior to enrolment or commencement, of details of any third parties that will provide training, assessment and related educational support service on its behalf (Clause 5.2b(iv)),
- providing prospective learners, prior to enrolment or commencement of training, current and accurate information that enables them make informed decisions about undertaking training with the RTO, including the learners rights if the RTO or a third party closes or ceases to deliver any part of the training product (Clause 5.2d(ii)),
- where fees are collected directly from learners, either by the RTO or through a third party, providing prospective learners, prior to enrolment or commencement of training, relevant information on fees, payment terms and conditions, deposits and refunds, the learner's consumer rights, including rights to obtain a refund for services not provided by the RTO in the event the arrangement is terminated early or if the RTO fails to provide the agreed service (Clause 5.3),

- ensuring all third parties are under written agreement to co-operate with the VET regulator (Clause 8.2), and
- informing TAC of any partnership arrangements for delivery of services on its behalf within 30 calendar days of the agreement being entered into, or coming to an end (Clause 8.3).

The environmental scan conducted for the development of the Council's 2018-2019 Annual Regulatory Strategy identified third party arrangements as an area of growing concern. The concerns were based on intelligence obtained from complaints, industry consultation and surveys. Issues that came to the attention of the Council included:

- RTOs not disclosing third parties,
- a lack of formalised agreements between RTOs and their third parties, and
- limited RTO understanding of what constitutes a third party arrangement.

The Council endorsed the Strategic Review to inquire into third party arrangements established by RTOs regulated by the Council and strategies RTOs employ to monitor training and assessment services provided on their behalf by third parties to ensure compliance with the Standards.

2.3 Objectives of the review

The objectives of the Strategy Review into Third Party Arrangements were to:

1. Ascertain the extent and types of third party arrangements established by RTOs registered with the Council.
2. Determine the content and coverage of third party agreements.
3. Identify strategies RTOs employ to systematically monitor services delivered on their behalf through third party arrangements.
4. Examine RTOs' understanding of what constitutes a third party arrangement and their obligations towards third parties within the remit of the Standards.
5. Examine third parties' understanding about their relationship with RTOs and their obligations towards the RTOs, students and TAC.
6. Assess RTO compliance with the clauses of the Standards which articulate RTO obligations in respect of third parties they engage to deliver services on their behalf – Clauses 2.3, 4.1e, 4.1f, 5.2b(iv), 5.2d(ii), 5.3, 8.2 and 8.3.
7. Examine learners' understanding of the roles and obligations of the parties, where third parties are providing services on the RTO's behalf, in relation to:
 - timely and accurate information about the training and assessment,
 - fees payable at enrolment, deposits and payment terms and conditions,
 - learners' consumer rights to refunds for services not provided,
 - complaints and appeals, and
 - certification.

3 STRATEGIC REVIEW

3.1 Methodology and scope

The Strategic Review included all RTOs registered with the Council that advised of third party arrangements¹ and comprised four key project phases:

1. research and data collection, including RTO and stakeholder consultation,
2. formulation of an audit strategy based on the outcomes of analysis of the data,
3. conduct of the audits, and
4. reporting on audit outcomes, including recommendations where appropriate.

The key element of Phase One of the review was to obtain information on what was occurring in relation to third party arrangements. A range of data sources, including from the Council's Third Party Register², the WA Department of Education and WA Training Councils³, informed the scope of the review.

The research and data collection stages of the review included an educational component. More than six months before the audits, an information campaign was conducted informing RTOs and stakeholders of the strategic review into third parties. The advance communication was intended to prompt RTOs to review their third party arrangements and ensure any new or existing arrangements that were not on the Council Third Party Register were notified prior to the Strategic Review.

At the outset, it was apparent that the use of third party arrangements was significant, however there were doubts about RTOs' understanding of what constituted a third party arrangement. To explore these issues, an online survey was administered to all RTOs registered by the Council.

In addition to seeking information from RTOs to inform the scope of the review, the survey was aimed at educating RTOs about what constituted a third party arrangement, the range of services that could be provided by third parties and services excluded from the definition of a third party service. A copy of the RTO survey questionnaire is at **Attachment A**.

¹ RTOs operating in WA and regulated by the national VET regulator, the Australian Skills Quality Authority (ASQA), were not included in the Review.

² Clause 8.3 of the Standards requires RTOs to notify the VET regulator of any written agreement entered into for the delivery of services on its behalf.

³ There are nine Training Councils operating in WA. Broadly, Training Councils provide a leadership role in advising on the training needs and priorities of industry in WA.

Data obtained from the RTO survey as part of Phase One of the review revealed high levels of third party activity:

- 33 (16%) of the 207 RTOs regulated by the Council recorded 276 third party arrangements on the Council's Third Party Register,
- 78 third parties were involved in partnerships with the 33 RTOs,
- the 276 arrangements covered 27 industry areas, and
- training and assessment were the most commonly outsourced services.

The educational aim of the RTO survey proved to be effective. It raised awareness about third party relationships, which resulted in a 30% increase in notifications to the Council's Third Party Register and an increase in the number of inquiries about third parties.

3.2 Audit criteria and scope

Phase Two of the Strategic Review involved formulation of an audit strategy based on analysis of the data collected in Phase One. RTOs were considered for inclusion in the audit sample if they met the following criteria:

- third party arrangements recorded on the Council's Third Party Register,
- confirmed as having third party arrangements through the RTO survey,
- confirmed by the Department of Education as delivering VET in secondary schools, and
- not listed on the Third Party Register, but recorded at earlier unrelated audits as having non-compliances associated with third party arrangements.

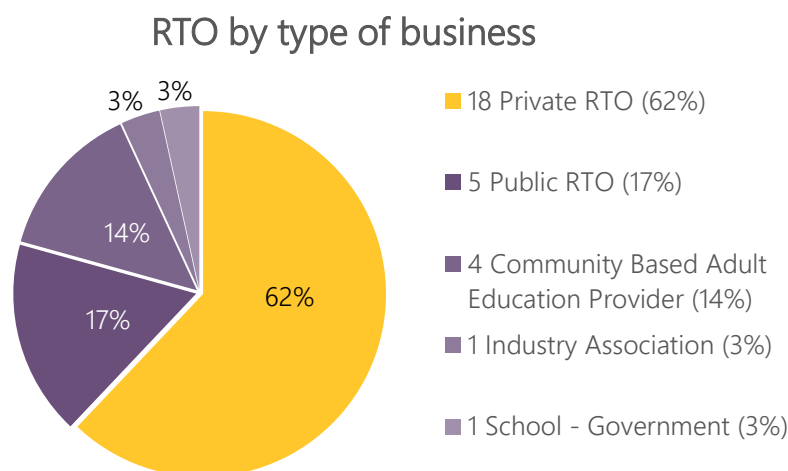
Of the 207 RTOs registered with the Council at the time, 33 RTOs met one or more of the criteria for inclusion in the audit sample. Of these, 29 RTOs (88%) that had not been audited in the previous 12 months were included in the audit sample.

Third party agreements involving delivery of training and assessment services were considered to be of a higher risk. As a result, RTOs recorded as having third party agreements for training and assessment, of which there were 25 (86%), were subject to site audits. Desktop audits were conducted for the other 4 (14%) RTOs.

The 29 RTOs in the audit sample recorded 219 third party agreements between them.

3.3 Demographics of RTOs in the audit sample:

The demographics of the 29 RTOs in the audit sample were as follows:



An RTO's location is based on its head office as registered with the Council.

- 21 (72%) of the RTOs audited were located in the Perth metropolitan area; and
- 8 (28%) were located in regional areas.

3.4 Stakeholder surveys

In addition to the audits of RTOs in the selected sample, the audit strategy included surveys of the key stakeholders associated with third party arrangements.

- The 29 RTOs in the audit sample were asked to provide information about the third parties they were in partnership with. These third parties were surveyed to identify the services they provided to the RTOs and to explore their understanding of their relationship and obligations towards their partner RTOs, learners and the Council. The surveys were administered by the Council's auditors when they visited the third parties as part of the audits. A copy of the **third party questionnaire** is provided at **Attachment B**.
- Learners enrolled in training at the time and in the previous 12 months, were also surveyed to explore whether the involvement of a third party in their training had any effect on their access to information about the training they were receiving. This information was collected through an online survey. A copy of the **student survey questionnaire** is at **Attachment C**.

Analysis of the survey responses from these stakeholders provided valuable insights into their understanding of and interactions within third party arrangements. They also enabled some confirmation that RTOs were fulfilling their obligations in accordance with the Standards.

4 THIRD PARTY ARRANGEMENTS

4.1 Role of third parties in VET outcomes

Organisations usually engage third parties to support their strategic objectives for reasons that could include expanding the business, saving on costs, improving efficiencies or shifting non-core or specialised functions to other service providers.

Third parties are playing an increasingly important role in the provision of VET programs. RTOs reported third parties offered opportunities to expand operations to more learners and in locations that would otherwise be inaccessible, access to facilities and specialised equipment, marketing and recruitment expertise and educational support services.

While third party arrangements offer a number of benefits to both the RTO and the third party, they also carry some inherent risks and challenges. When an RTO engages a third party to deliver training and assessment services on its behalf, it is contracting out services for which it remains legally accountable for ensuring compliance with the Standards.

The shared responsibility between the RTO and the third party poses a potential risk to the quality of training outcomes if roles and responsibilities are not clearly articulated and understood by learners and other stakeholders.

4.2 Types of third party arrangements established by RTOs

The 29 RTOs audited as part of the Strategic Review were asked to submit copies of their third party agreements. A review of the 219 third party agreements submitted revealed two main types of third party arrangements, based on whether or not the relationship between the RTO and the learner was direct or indirect.

- In the first type of arrangement, the RTO's relationship is directly with the learner. The learner engages the RTO for VET services and the RTO sub-contracts a third party to support delivery of the services to the learner.
- In the second type of arrangement, the RTO's relationship with the learner could be categorised as indirect. That is, the third party entity delivers services directly to their own clients. Examples include schools, where the school delivers services to students on behalf of the RTO, or enterprises such as those wishing to customise training delivery to their own employees.

The majority of third party agreements were in the second category, comprising delivery of services by third parties to their own clients/employees. Of these:

- 146 (66%) of the agreements were between RTOs and schools, where the school engaged the RTO on behalf of its learners for delivery of VET in secondary schools,
- 67 (31%) were agreements between RTOs and enterprises, where the enterprise engaged the RTO on behalf of its employees for the delivery of VET programs, and
- 6 (27%) of the agreements involved RTOs engaging the services of other RTOs as third parties.

4.3 Coverage of third party agreements

Of the 219 agreements reviewed:

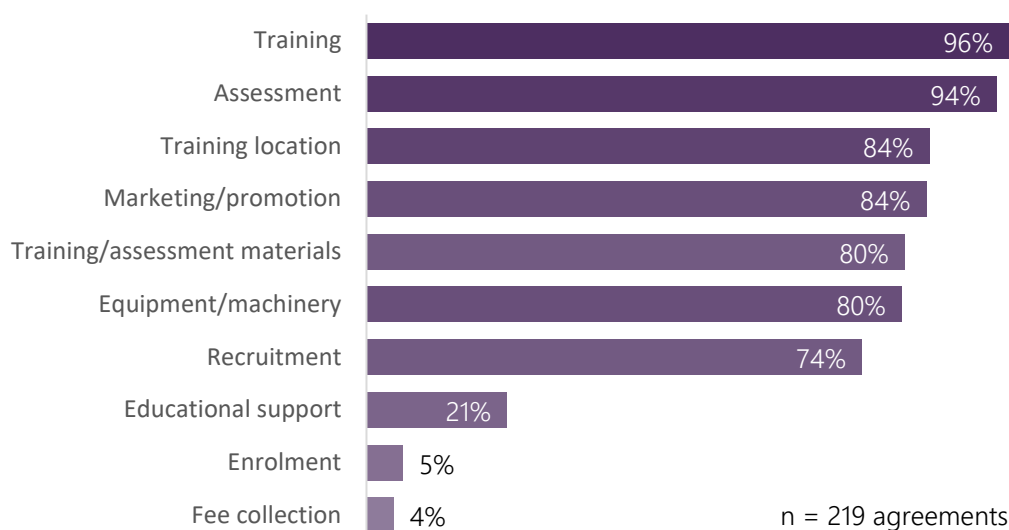
- 5 RTOs held 183 (84%) of the agreements between them; 3 of those 5 RTOs had agreements with more than 20 different third parties, and
- the remaining 24 RTOs held 36 (16%) of the agreements between them.

RTOs who outsource training delivery and assessment to many third parties face the challenge of having to commit additional resources to the monitoring and oversight function. Insufficient resource allocation could compromise the outcomes of the third party services as well as the RTO's operations, including any training the RTO is delivering itself.

The majority of agreements were for 12 months, with an option for review or extension, and some agreements were in a second iteration. A few agreements were ongoing.

The chart below reports on the types of services provided by third parties to RTOs, as recorded in the third party agreements reviewed.

Type of services provided by third parties for RTOs
(by agreements)

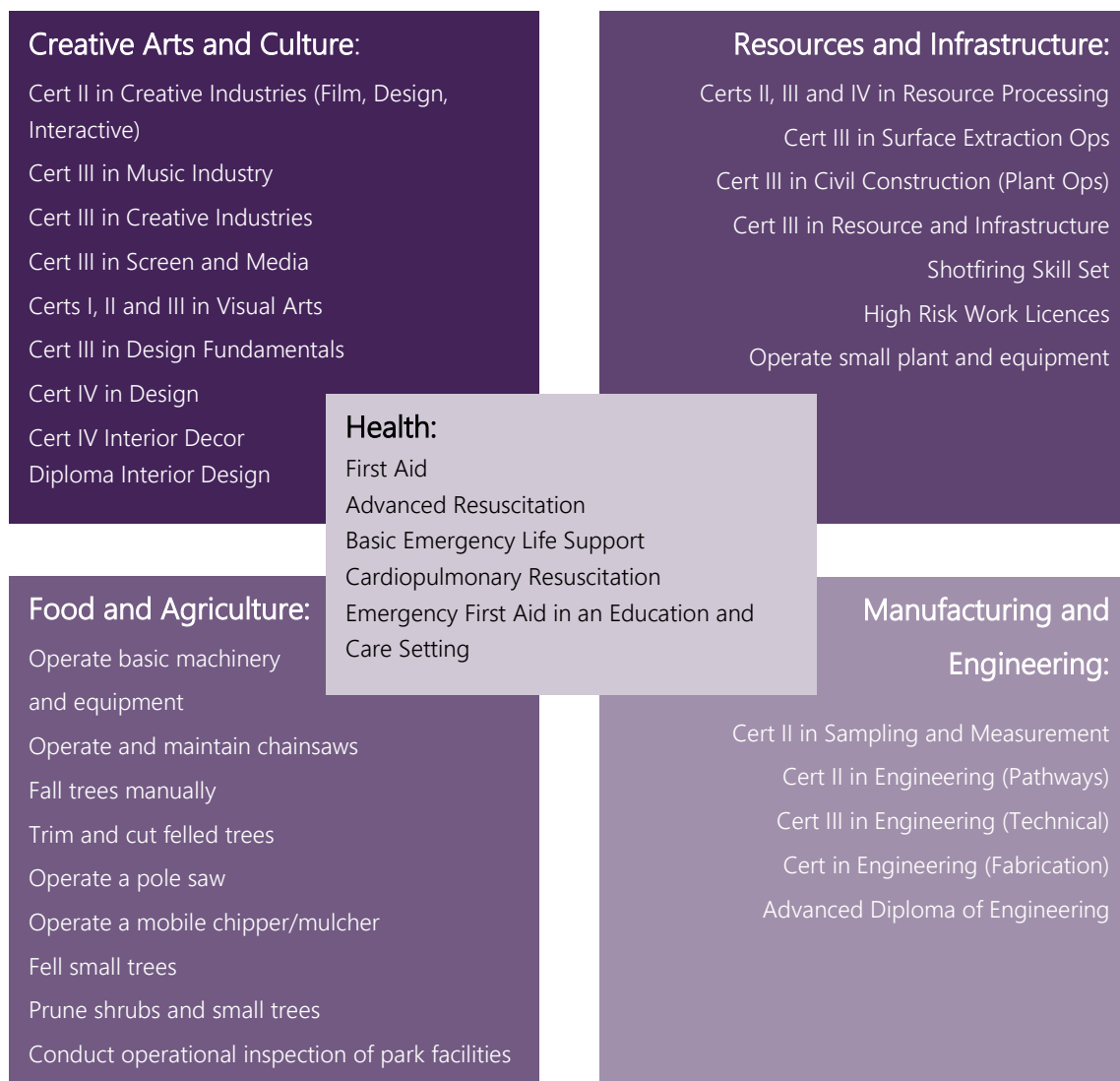


The most commonly outsourced services were training (96%), assessment (94%), provision of a training location (84%) and marketing/promotion ((84%). Fee collection (4%) was the least outsourced service.

Most agreements involved delivery of more than one service by the third parties:

- 168 agreements (77%) were for the delivery of six or more services,
- 45 agreements (20%) involved two to five services, and
- only six agreements (1%) were for the delivery of a single service.

The top five industry areas and qualifications represented in the third party agreements reviewed were:



Most of the agreements were for domestic delivery by local third parties, with 211 (96%) agreements involving domestic partnerships for local delivery. Only eight (4%) agreements involved international third party delivery to overseas/offshore learners.

146 (67%) third party agreements were for VET delivery in secondary schools and 67 (31%) for in-house delivery of training by enterprises to their employees.

5 RTO ENGAGEMENT WITH THIRD PARTIES

5.1 RTO understanding of third party arrangements

In February 2019, at the commencement of the strategic review, 36 RTOs were listed on the Council’s Third Party Register. These RTOs together had 183 third party agreements with 160 third parties. Council communications to RTOs about the forthcoming strategic review prompted RTOs to focus on their third party arrangements. The RTO survey helped to clarify what constituted a third party service and played a key role in educating RTOs about third party arrangements.

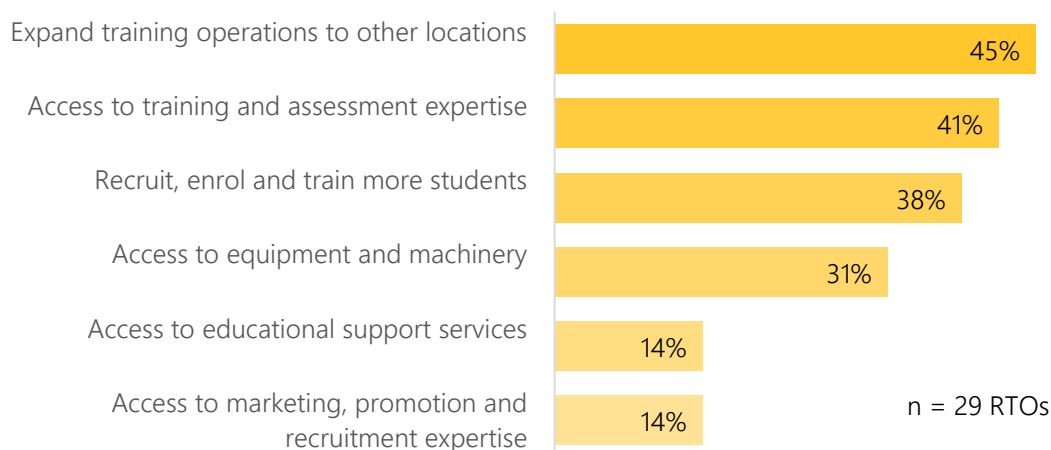
The result was an increase in notifications to the Council about third party arrangements. At the completion of the strategic review in October 2019, there had been a 30% increase in notifications for third party arrangements, with the Register recording 47 RTOs who had 273 agreements in place with 223 third parties.

5.2 Benefits and challenges of third party arrangements

The 29 RTOs that were the subject of the audits were surveyed to find out what they perceived to be the benefits and challenges of having third party arrangements.

5.2.1 Benefits

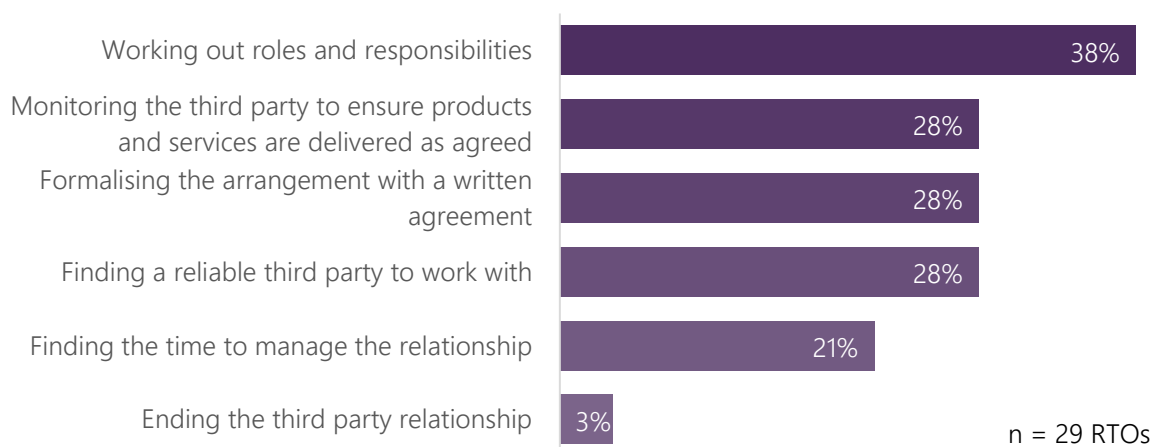
Benefits of having a third party (by RTOs audited)



- 13 (45%) RTOs reported expansion of training operations to other locations as the advantage of involving a third party in their operations,
- 12 (41%) of the RTOs reported access to training and assessment expertise as a benefit of engaging a third party,
- 11 (38%) RTOs reported recruitment, enrolment and training more students as the advantage of engaging a third party,
- 9 (31%) RTOs reported having a third party arrangement gave them access to equipment and machinery, and
- 13 RTOs (45%) reported other advantages of working with a third party. These were mainly associated with the provision of training services to schools.

5.2.2 Challenges

Challenges of having a third party (by RTOs audited)



In response to the question about the challenges of having third party arrangements:

- 11 (38%) RTOs reported that working out the roles and responsibilities was a challenge,
- 8 (28%) RTOs reported monitoring the third party to ensure the products and services were delivered as agreed was a challenge,
- 8 (28%) RTOs identified finding a reliable third party to work with and formalising the arrangement through a written agreement was a challenge, and
- 6 (21%) RTOs reported finding the time to manage the relationship was a challenge associated with the third party arrangement.

None of the RTOs reported that managing the relationship when things go wrong was a challenge.

5.3 RTO monitoring of third parties

Clause 2.4 of the Standards require RTOs to have sufficient strategies and resources to systematically monitor any services delivered on its behalf, and use them to ensure that the services delivered comply with the Standards at all times.

In order to be able to determine *sufficiency*, it would have been necessary for the audits to examine the requirements of each of the training products and associated training and assessment strategies for which the RTO has the third party arrangement.

During the audit scoping stage, it was determined that an examination of that depth was beyond the primary objective of inquiring into the types of third party arrangements in place, the roles and responsibilities of the parties involved and the monitoring and oversight strategies RTOs employed.

Assessment of compliance with Clause 2.4 was therefore limited to an examination of the strategies RTOs employed to monitor third party services. This report provides no comment on the sufficiency or effectiveness of those strategies. RTOs identified as having potential non-compliance with Clause 2.4 during the audits were further assessed to determine if follow up audits were warranted.

Third party agreements submitted by RTOs were reviewed to examine strategies included for monitoring and oversight of the services being provided. The agreements were very similar in content and incorporated clauses typical of agreements of this nature. They covered roles and responsibilities, confidentiality, professional indemnity and public liability insurances, intellectual property and copyright, agreement variation, fault remediation, communication and reporting, dispute resolution and agreement review/evaluation.

A variety of RTO monitoring strategies were identified in the agreements and specific examples that strengthened monitoring and oversight of third party services were noted. These included:

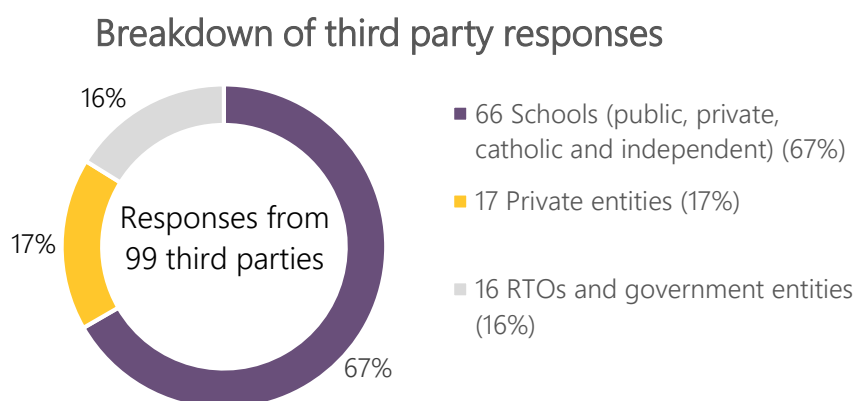
- identifying specific contacts for communication between the parties on issues to do with operations, performance delivery and the agreement,
- prohibiting third parties from sub-contracting agreed services to other parties,
- validation of third party's capacity to deliver – physical resources, facilities, timelines, delivery and assessment processes and qualifications of delivery staff ,
- on-site inspection of training facilities prior to commencement of delivery, including video/photo evidence for remote locations,
- prior RTO approval for any third party changes such as the use of RTO training material or specified trainers and assessors,
- notification of any changes to third party operations that may affect ability to deliver services that are the subject of the agreement,
- quarterly visits by RTO staff for compliance audits,
- mentoring of third party trainers/assessors by the RTO,
- RTO meet and greet with learners on first day for introduction and orientation,
- consideration of feedback from learners, trainers and assessors in evaluating performance of third party,
- performance management arrangements to assess whether services were being delivered in accordance with the agreement, and
- vetting of marketing materials produced by the third party to ensure accuracy and currency.

If actual RTO practice reflected the monitoring arrangements described in the third party agreements reviewed, these inclusions would contribute to effective third party relationships and potentially enhance VET outcomes for the learners.

6 THIRD PARTY ENGAGEMENT WITH RTOs

The 29 RTOs that were the subject of the Strategic Review were asked to provide details of third party organisations they had agreements with. These third parties were then invited to complete the Third Party Survey, which sought information about nationally recognised training services they provided to RTOs.

6.1 Third party respondents



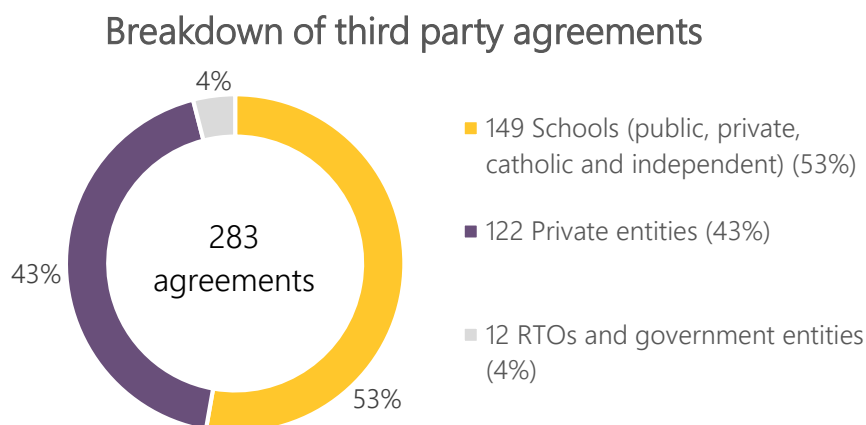
Altogether, 154⁴ parties were invited to complete the survey, of which 99 responses were received, representing a response rate of 64%. Of these 99 third parties:

- 66 (67%) were schools (public, private, catholic and independent),
- 17 (17%) were private entities, and
- 16 (16%) were RTOs and government entities.

⁴ The 29 RTOs audited recorded 219 third party agreements between them, including 154 unique third parties. Some third parties had more than one agreement with RTOs.

6.2 Third party agreements

Third parties were asked to provide information about the RTOs with whom they had agreements. The 99 third party respondents collectively reported 283 agreements, of which 122 (43%) were with Council regulated RTOs and 149 (53%) were with other VET regulators.



Third party reporting of agreements with RTOs not regulated by the Council was indicative of a lack of awareness of RTO regulatory arrangements. This could be problematic, as third parties would be expected to know who regulates the RTOs they have agreements with in order to meet their obligation to co-operate with those regulators when required.

Third parties reported varying numbers of agreements with RTOs:

- 49 third parties (50%) had two to five agreements,
- 40 third parties (40%) had only one agreement, and
- 10 third parties (10%) had more than five agreements.

6.3 Third party awareness of RTO obligations

Overall, the third parties that responded to the survey indicated a very high level of awareness of the RTO's obligations to the VET Regulator:

- All 99 third party respondents (100%) said they were aware of the requirement to have a written agreement with the RTO for the services they provided to the RTO,
- 95 third parties (96%) were aware the RTO is required to inform the Council about the third party agreement, and
- 95 third parties (96%) were aware they must co-operate with the Council if contacted to provide information about the services they provided.

Despite the reported high levels of third party awareness of the obligation to co-operate with the VET Regulator, the survey response rate of 64% suggests this awareness did not always translate into reality, as some third parties did not respond, even with reminders.

6.4 Communication with RTOs

Third parties were also asked about how they and the RTOs they were in partnership with, monitored the services being provided.

The majority of respondents reported this was done through formal meetings (86%) and informal communications (82%). Other monitoring mechanisms reported were site visits and written correspondence.

6.5 Third parties' previous involvement in VET

An area of concern associated with the growth in third party arrangements was conjecture that third parties could be establishing partnerships with RTOs to avoid the compliance obligations associated with registration. The third party survey sought to explore the extent of third parties' previous involvement in the regulated VET space.

Only a minority of third parties reported having been previously registered as an RTO or worked in an RTO. Of the 99 third parties that responded to the survey:

- 17 (17%) reported they were previously registered as an RTO. Ten RTOs were previously registered with the Council and three of them are currently registered, and
- 42 (42%) of the respondents said either they or someone else in their organisation delivering the service on the RTO's behalf had previously worked for an RTO.

It was encouraging to note that some third parties had prior experience in the regulated VET space, as the experience could potentially indicate a better understanding of and compliance with the Standards.

Anecdotal information from third party interviews during the audits indicated a minority of third parties reported having to 'manage up' to improve the RTO's engagement with them for the delivery of training and assessment services.

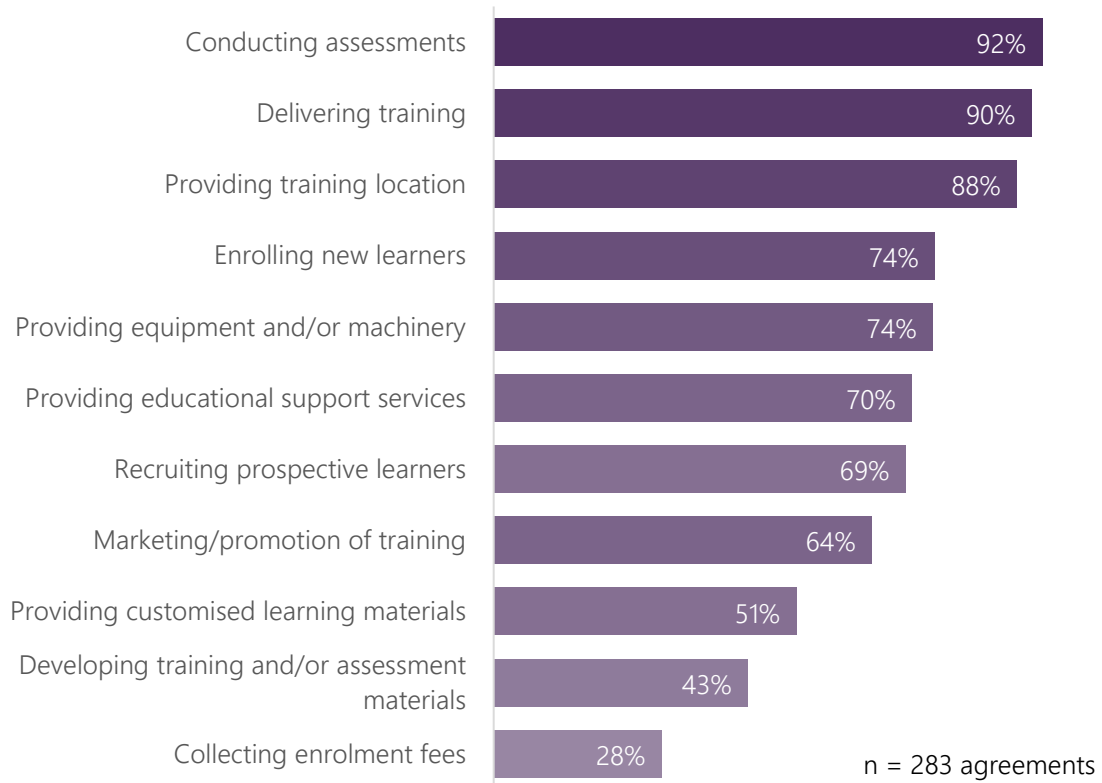
6.6 Services provided by third parties for RTOs

The top three services third parties reported they provided for RTOs are:

- conducting of assessments (92%),
- delivering of training (90%), and
- providing a location for training (88%).

The following table reports on services third parties reported they provided to RTOs.

Services provided by third parties to RTOs (by agreements)



It was noted that 28% of third party respondents to the survey indicated they collected fees on behalf of the RTO.

7 LEARNERS' EXPERIENCES WITH THIRD PARTY ARRANGEMENTS

One of the objectives of the strategic review was to gauge learners' awareness of the involvement of a third party in their training, and whether that had any effect on their access to information about the training they received. The information was collected through a survey comprising eight questions. A copy of the survey is at **Attachment C**.

For various reasons, including the timing of the surveys and issues with access to active student email addresses, the response rate for the student survey was low. Very few responses were received from students enrolled at public RTOs and schools, who represented the largest student cohort.

Of the 7,258 invitations sent out, 357 responses were received. This represented a 4.9% response rate, which was an insufficient sample size on which to draw conclusive findings.

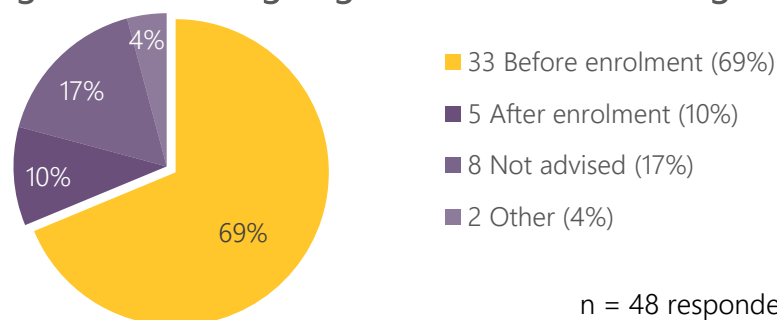
- 78 (22%) of the respondents advised they were still in training,
- 253 (71%) of the respondents said they had completed their training, and
- 26 (7%) either never commenced training or decided not to complete their training.

7.1 Information about third party involvement in training

In the survey, learners were asked to indicate whether it was the organisation that delivered their training or another organisation that provided pre-enrolment information.

In the majority of cases, learners who responded to the survey indicated the organisation that delivered their training was the one that provided their pre-enrolment information.

When were learners advised that another organisation was going to deliver their training?

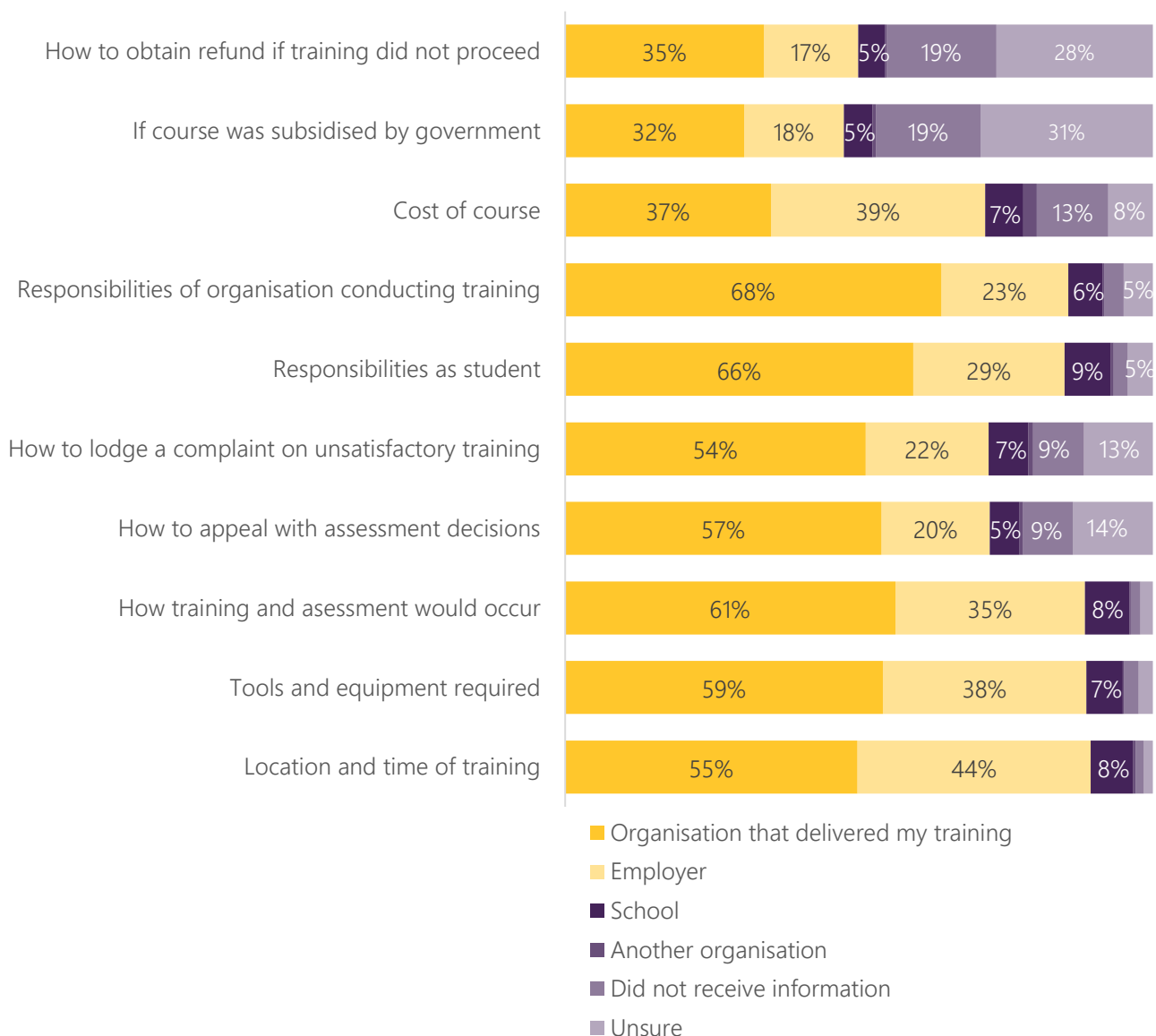


- 33 (69%) of the respondents reported they were informed another organisation was going to deliver their training before they enrolled.
- 5 (10%) were informed another organisation was going to deliver their training after they enrolled.
- 8 (17%) respondents were not told another organisation was going to deliver their training.
- Not all learners were advised before enrolment that another organisation would be delivering their training.

7.2 Pre-enrolment information

Most respondents reported that they were provided pre-enrolment information by the organisation that delivered their training.

Pre-enrolment information provided to learners



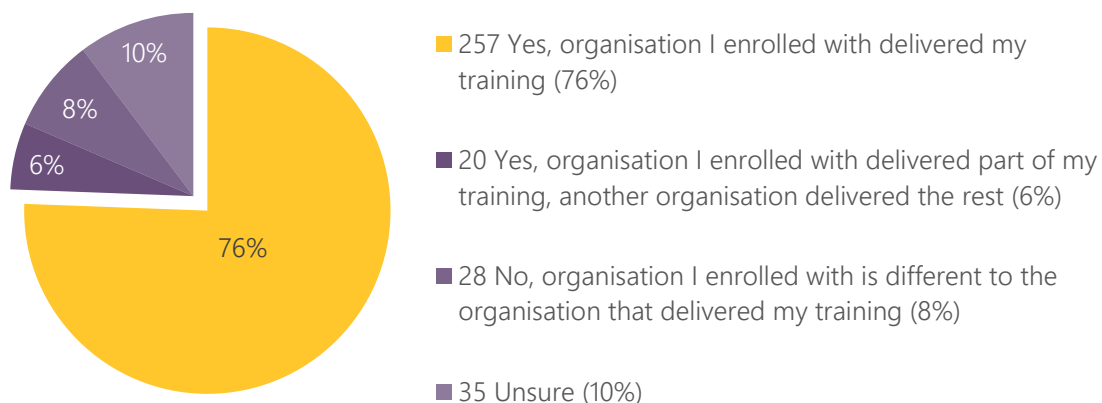
Not all learners were provided with all required pre-enrolment information. It is of some concern that about 47% of learner respondents said they did not receive, or were unsure if they had received, information about how to obtain a refund.

It should be noted that not all pre-enrolment information is applicable to all students. For example, it is not likely that learners would be informed about government subsidies if the training they were enrolled in was not eligible for those subsidies.

7.3 Enrolment and training delivery

More than 75% of learner respondents reported that the organisation that enrolled them was also the one that delivered their training.

Which organisation delivered your training?



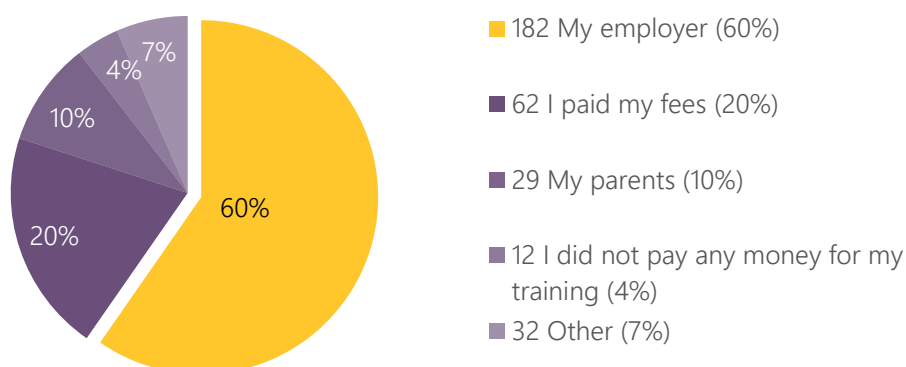
n = 340 respondents

Of the 340 respondents, 257 (76%) reported that the organisation that they enrolled with also delivered their training and 28 (8%) said the organisation they enrolled with is different to the organisation that delivered their training. Only 35 (10%) of the respondents were unsure whether the same organisation they enrolled with delivered their training.

7.4 Payment of fees

Most of the 305 respondents to the question of who paid their fees reported their fees were paid by their employer.

Who paid your fees?



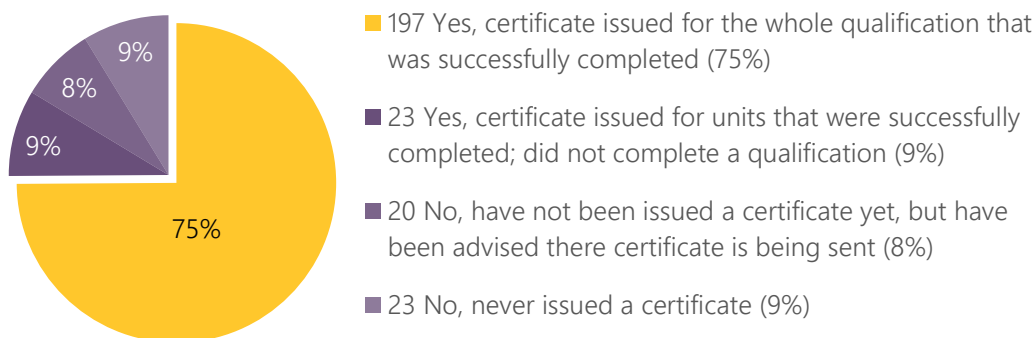
n = 305 respondents

In answer to the question about who their fees were paid to, 254 (78%) of the 323 respondents said fees were paid to the organisation that delivered their training.

7.5 Certification

Learners were asked whether they were issued certification for the training they had successfully completed. The majority of respondents reported they were.

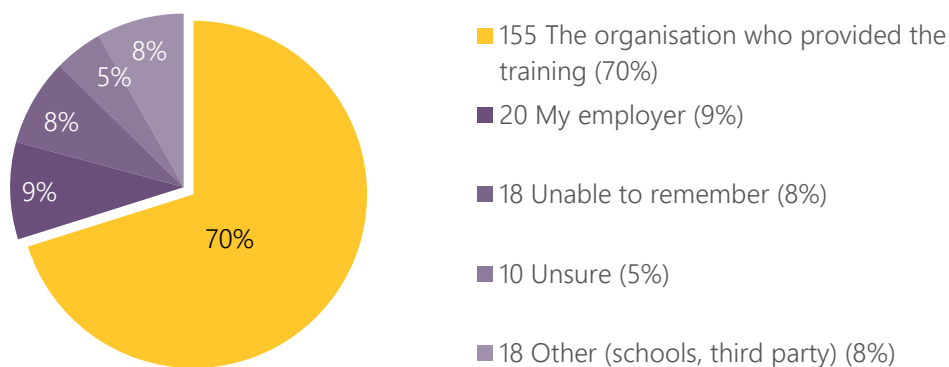
Were you issued with a certificate?



n = 263 respondents

- 197 (75%) respondents advised they were issued certification for the whole qualification successfully completed,
- 23 (9%) reported they did not complete a qualification but have received certification for units successfully completed, and
- 23 (9%) respondents said they were never issued with certification.

Who issued your certificate?



n = 221 respondents

- 155 (70%) of the respondents reported the organisation they enrolled with issued their certification.

While the survey findings are inconclusive, the results overall indicated involvement of third parties had minimal impact on provision of pre-enrolment information to learners.

8 RTO COMPLIANCE WITH THE STANDARDS FOR RTOs

Registered Training Organisations (RTOs) are required to demonstrate ongoing compliance with the Standards. These are a set of national quality standards governing the delivery of training and assessment services in Australia's VET system.

Following an audit, an RTO is deemed to be compliant or non-compliant with the Standards audited. Non-compliant RTOs are provided the opportunity to rectify non-compliance and provide evidence that a compliant system has been put in place. If an RTO cannot demonstrate ongoing compliance the Council may place conditions or sanctions on its operations. RTOs that were found to be non-compliant during the Strategic Review were managed in accordance with these established processes.

8.1 Standards for RTOs audited in strategic review

The Strategic Review focussed on compliance which articulate RTO obligations in respect of third parties delivering services on their behalf. The following clauses were audited:

Clause 2.3 – The RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.

Clause 4.1e – Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf.

Clause 4.1f – Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party.

Clause 5.2b(iv) – Prior to enrolment or commencement of training, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:
the training and assessment, and related educational and support services the RTO will provide to the learner including the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf.

Clause 5.2d(ii) – Prior to enrolment or commencement of training, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

The learners rights, including if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in.

Clause 5.3 – Where the RTO collects fees from the individual learner, either directly or through a third party, the RTO provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying:

- a) all relevant fee information including: i) fees that must be paid to the RTO; and ii) payment terms and conditions including deposits and refunds;
- b) the learner’s rights as a consumer, including but not limited to any statutory cooling-off period, if one applies;
- c) the learner’s right to obtain a refund for services not provide by the RTO in the event the: i) arrangement is terminated early; and ii) the RTO fails to provide the agreed service.

Clause 8.2 – The RTO ensures that any third party delivering services on its behalf is required under written agreement to co-operate with the VET Regulator:

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) in the conduct of audits and the monitoring of its operations.

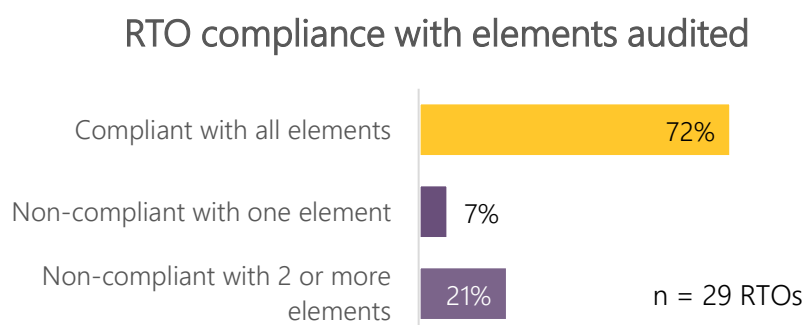
Clause 8.3 – The RTO notifies the Regulator:

- a) of any written agreement entered into under Clause 2.3 for the delivery of services on its behalf within 30 calendar days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and
- b) within 30 calendar days of the agreement coming to an end.

8.2 Overall compliance

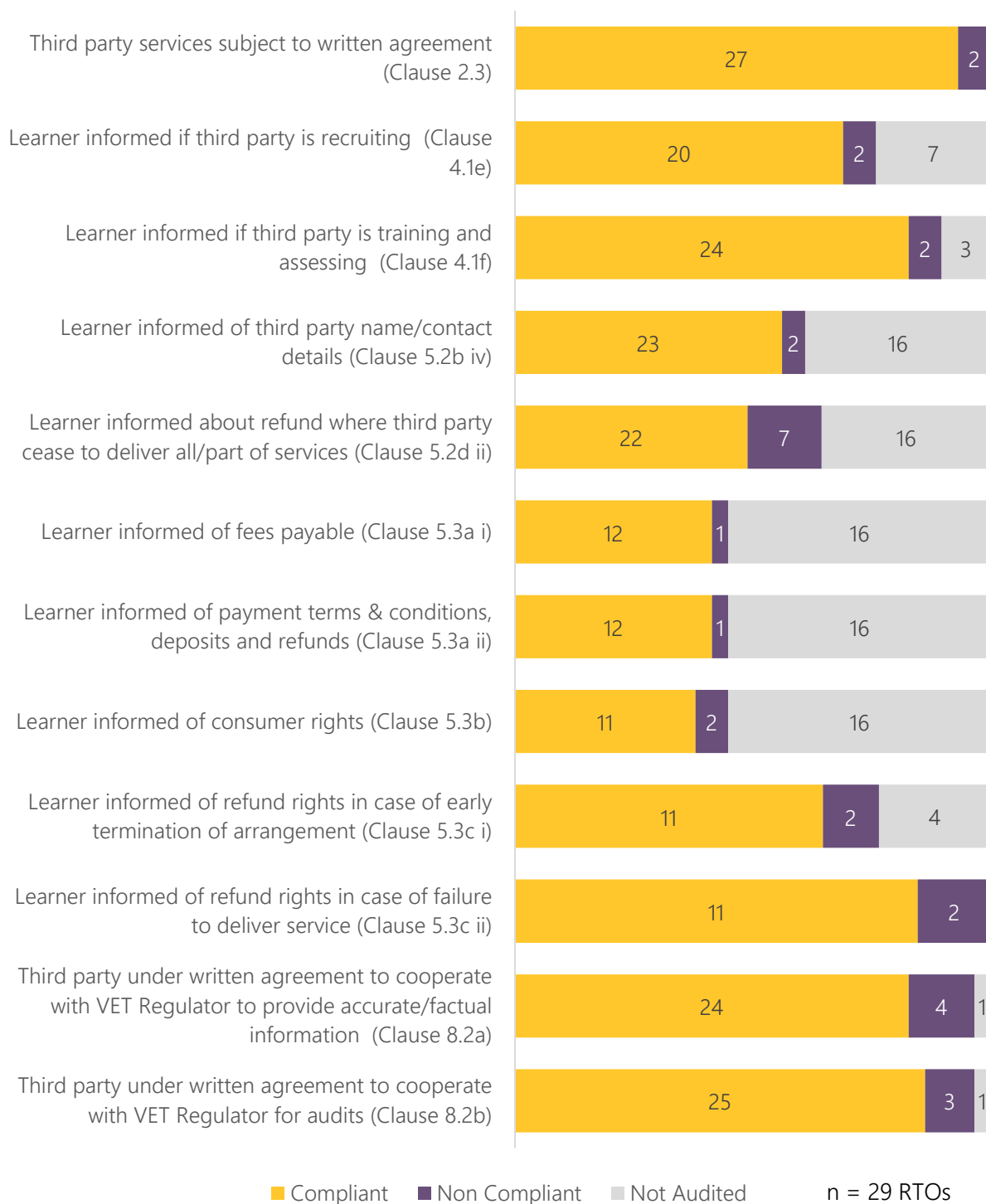
Of the 29 RTOs audited, 21 (72%) demonstrated compliance with all the elements they were audited against, an indication that the majority of RTOs are aware of their obligations to third party relationships in relation to the Standards.

The table below shows overall RTO compliance with the elements audited.



It should be noted that not all RTOs were audited against all elements in the audit scope, for the reason that not all were relevant for every RTO being audited. For example, in some cases fees were not paid by learners, so the clause relating to provision of pre-enrolment information to learners about fees (Clause 5.3) was not applicable to the RTO.

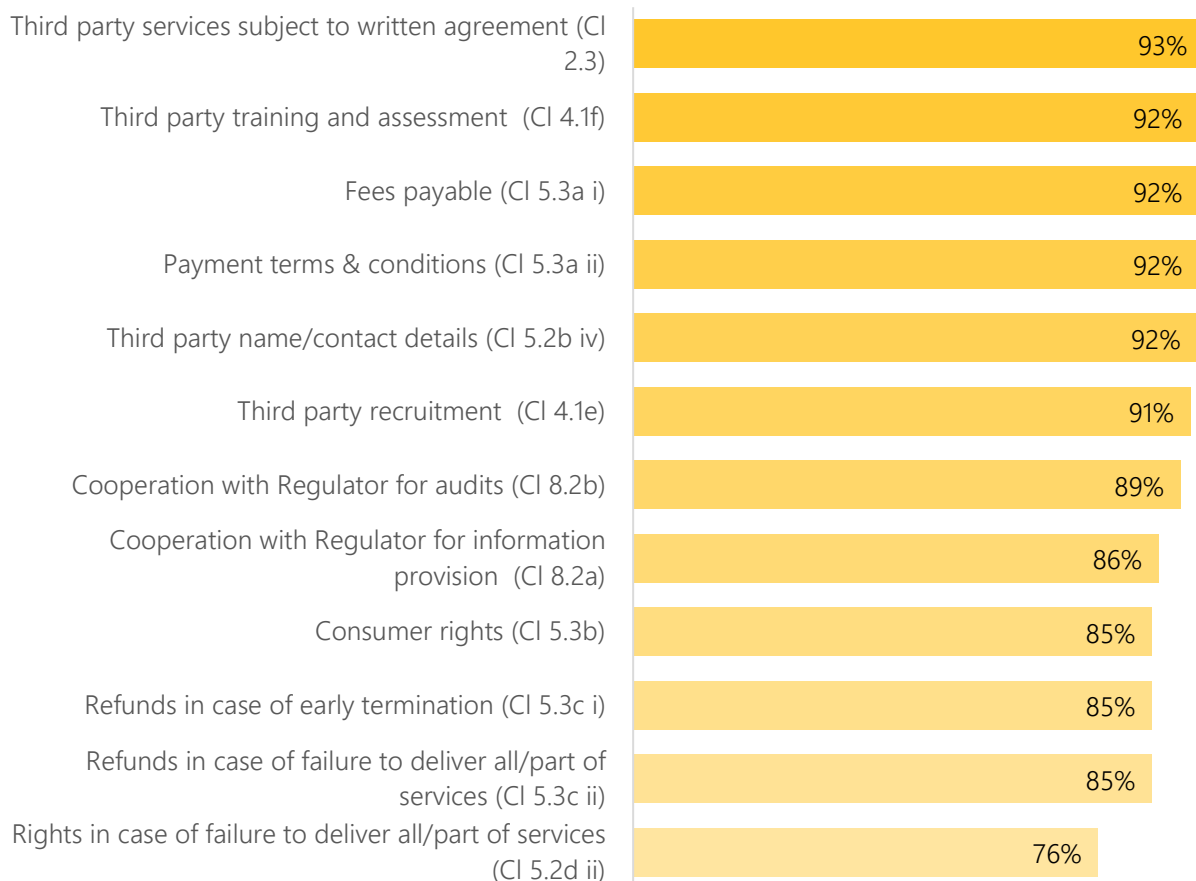
Overall compliance of audit findings



8.3 Areas of highest compliance

RTOs demonstrated the highest levels of compliance in the following elements audited:

Elements with the highest level of compliance



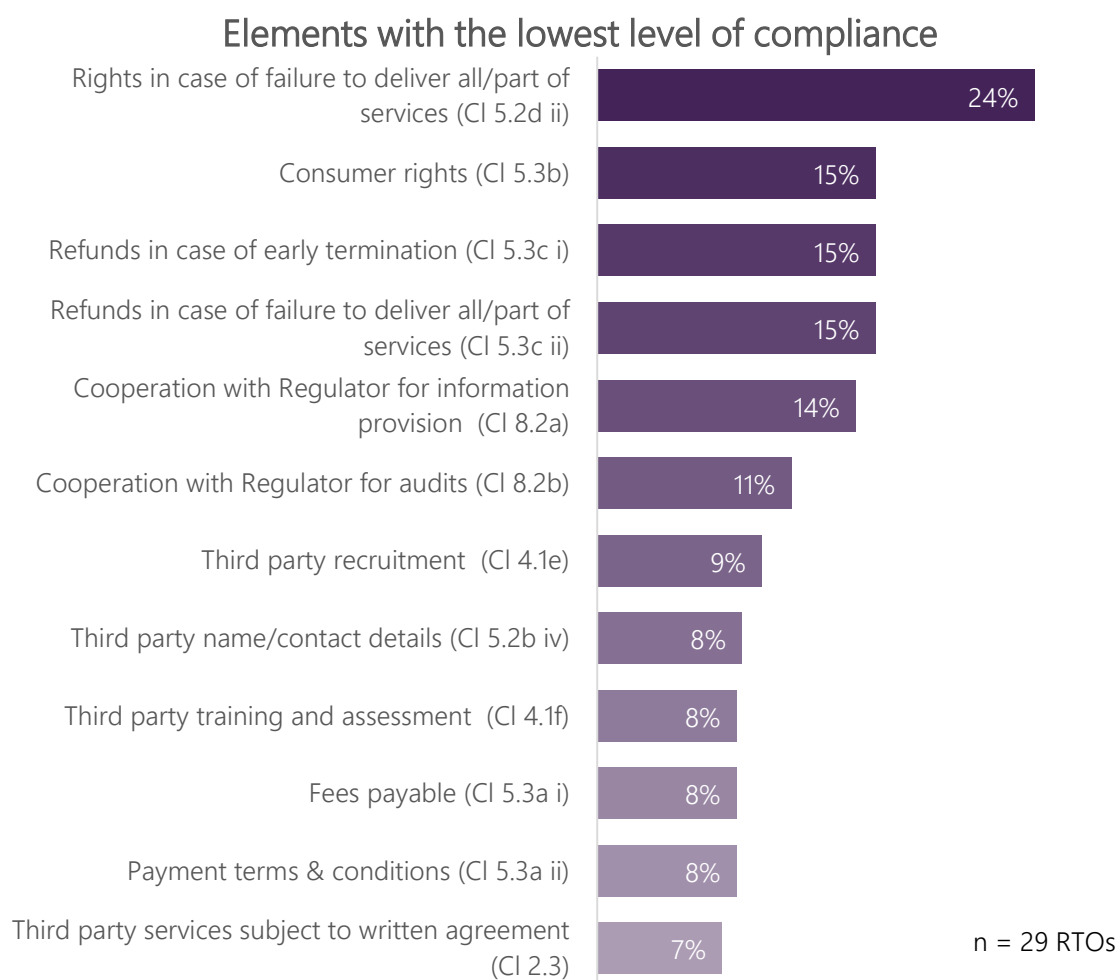
n = 29 RTOs

RTOs demonstrated the highest levels of compliance in the following areas:

- each third party arrangement to be the subject of a written agreement (Clause 2.3) – 27 (93%) of the 29 RTOs audited were found compliant
- provision of accurate and factual information that distinguishes where training and assessment is being delivered on its behalf by a third party (Clause 4.1f) – 24 (92%) of the 26 RTOs audited were found compliant
- third parties are under written agreement to co-operate with the VET Regulator in the conduct of audits and monitoring of its operations (Clause 8.2b) – 25 (89%) of the 28 RTOs audited were found compliant
- third parties are under written agreement to co-operate with the VET Regulator in providing accurate and factual responses to information requests (Clause 8.2a) – 24 (86%) of the 28 RTOs audited were found compliant

8.4 Areas of lowest compliance

RTOs demonstrated the lowest levels of compliance in the following elements audited:



The lowest levels of compliance were in relation to the requirement for RTOs to inform learners about refund arrangements where the RTO or third party closes or ceases to deliver any part of the training product that the learner is enrolled in (Clause 5.2d(ii)).

Seven (24%) of RTOs audited were found to be non-compliant with this requirement.

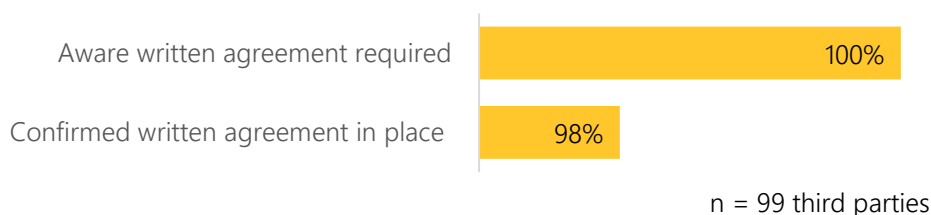
8.5 Compliance with each element of the Standards for RTOs

Detailed findings for each element of the Standards audited for this Strategic Review are reported below.

8.5.1 Third party services are the subject of a written agreement (Clause 2.3)

RTOs demonstrated a high level of compliance with the requirement to ensure that third party services provided on their behalf were the subject of a written agreement.

27 (93%) of the 29 RTOs audited were compliant with this requirement.



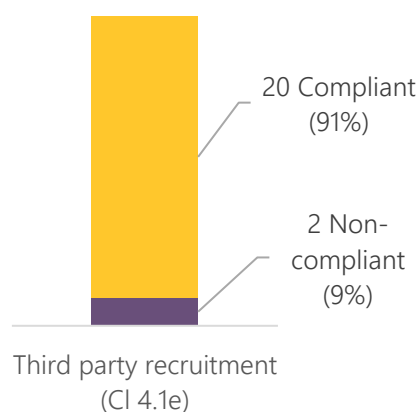
The high level of compliance with this requirement concurs with findings from the third party survey, which reported all 99 third party respondents (100%) said they were aware there must be a written agreement with the RTO for the services they provided to them. In addition, 97 (98%) third party respondents confirmed there was a written agreement for the services they provided to RTOs.

8.5.2 Information makes clear where a third party is recruiting prospective learners on the RTO's behalf (Clause 4.1e)

The Standards require RTOs to provide accurate and accessible information to prospective learners to help them make informed decisions about their training and assessment needs.

Clause 4.1e requires RTOs to ensure prospective learners are clearly informed about where third parties are involved in recruiting learners on behalf of the RTO.

20 (91%) of the 22 RTOs audited against this element were compliant, indicating a high level of compliance with this requirement.

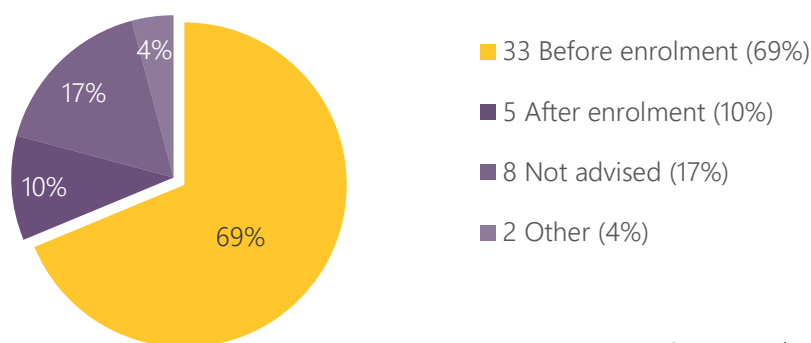


n = 22 RTOs

8.5.3 Information distinguishes where training and assessment is being delivered on its behalf by a third party (Clause 4.1f)

The Standards instruct RTOs to ensure prospective learners are clearly informed where third parties are delivering training and assessment on behalf of the RTO.

When were learners advised that another organisation was going to deliver their training?



n = 48 respondents

When asked in the student survey whether they were informed a third party was going to be involved in their training delivery:

- 33 (69%) of the respondents reported they were informed another organisation was going to deliver their training before they enrolled
- 5 (10%) were informed another organisation was going to deliver their training after they enrolled
- 8 (17%) respondents were not told another organisation was going to deliver their training.

The low student survey response rate makes any conclusions difficult, however, they support the audit findings of high levels of RTO compliance in informing prospective learners about involvement of third parties in training delivery and assessment.

8.5.4 Learners are provided the name and contact details of third party providing training and/or assessment services on the RTO's behalf (Clause 5.2b (iv))

The Standards require RTOs to provide learners with the name and contact details of third parties involved in their training. 92% of RTOs audited were found to be compliant. Responses from the student survey concurs with the high levels of compliance reported in relation to this requirement. 33 (69%) of the respondents reported they were informed another organisation was going to deliver their training before they enrolled.

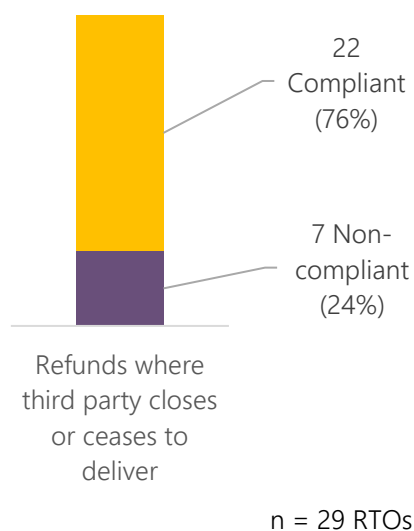
For the few RTOs that were non-compliant with this requirement, the audit found they had failed to inform prospective learners of the name and contact details of third parties that would provide training and/or assessment, and related educational and support services to the learner on the RTO’s behalf.

8.5.5 Learners are informed of their rights if the RTO or third party closes or ceases to delivery any part of the training the learner is enrolled in (Clause 5.2d (ii))

22 RTOs (76%) audited were compliant with the requirement to inform learners of their rights to a refund if the RTO or third party closes or ceases to deliver any part of the training.

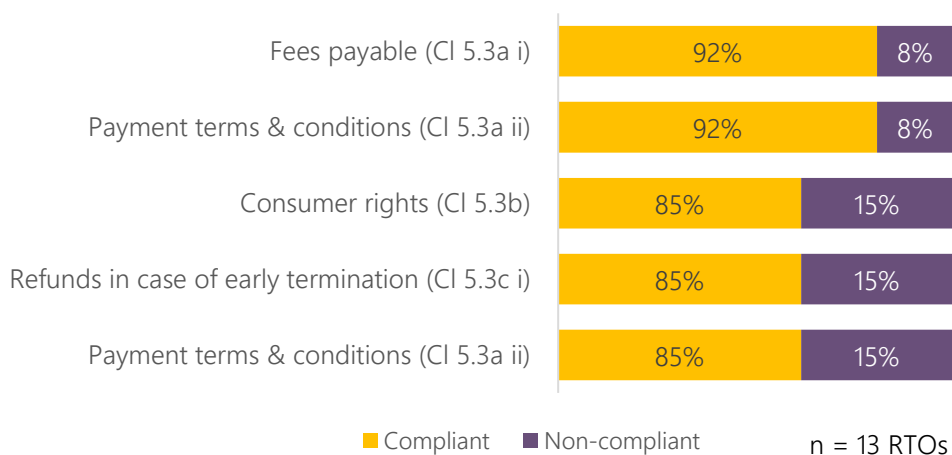
7 RTOs (24%) failed to provide current and accurate information to prospective learners about these rights. This element recorded the highest level of non-compliance.

47% of learners responding to the survey said they did not receive, or were unsure if they had received, information about how to obtain a refund. This concurs with the audit finding and is an issue requiring further attention.



8.5.6 Learners are informed of fees, payment terms and conditions, including deposits and refunds and consumer rights (Clause 5.3)

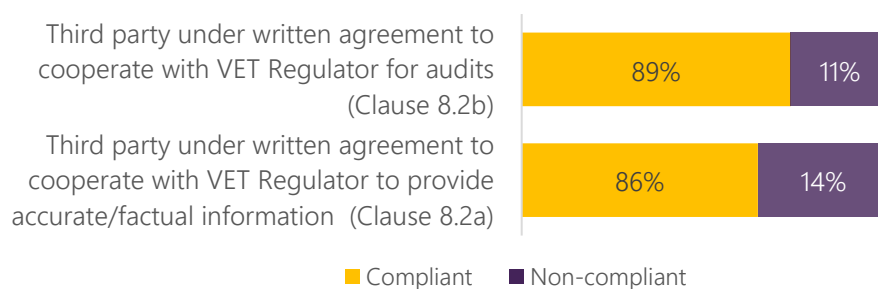
High levels of RTO compliance was reported in relation to requirements to inform learners about fees, payment terms and conditions and any applicable cooling-off periods.



- 12 RTOs (92%) were compliant with requirement to inform learners about fees payable (Clause 5.3a(i)),
- 12 RTOs (92%) were compliant with requirement to inform learners about payment terms and conditions (Clause 5.3a(ii)),
- 11 RTOs (85%) were compliant with requirement to inform learners about their consumer rights (Clause 5.3b), and
- 11 RTOs (85%) were compliant with requirement to inform learners about refunds for services not provided in case of early termination of arrangement or failure to provide agreed services.

8.5.7 Third party co-operation with the VET Regulator (Clause 8.2)

RTOs are required to ensure that third parties delivering services on their behalf are under written agreement to co-operate with the VET Regulator in responding to information requests and the conduct of audits and monitoring of its operations. Again, a high level of RTO compliance was recorded for this requirement.



In their written agreements with third parties:

- 24 (86%) of the RTOs audited included the requirement for the third parties to co-operate with the VET Regulator in responding to information requests (Clause 8.2a), and
- 25 (89%) of the RTOs audited included the requirement for the third parties to co-operate with the VET Regulator in the conduct of audits and monitoring of operations (Clause 8.2b).

In the few instances of non-compliance, the audits found that not all written agreements included the requirement for third parties to co-operate with the VET Regulator. In some cases, RTOs had used template third party agreement documents that had not been amended to include this requirement.

Third parties are to be commended for their co-operation with the Council in the Strategic Review. It was noted that every third party approached for the review co-operated with Council Secretariat staff and auditors for information provision and conduct of the audits.

8.5.8 Notification of third party agreements within 30 calendar days of commencement or cessation (Clause 8.3)

The Standards require RTOs to notify the Regulator of any written agreements with third parties within 30 calendar days of the agreement being entered into, or before they take effect, whichever occurs first (Clause 8.3a) and within 30 calendar days of the agreement coming to an end (Clause 8.3b).

Information from the Council's Third Party Register was used to determine compliance with the requirement for RTOs to notify the Council of commencements and cessations of the agreements. Given the retrospective nature of the strategic review, it was not possible to ascertain RTO compliance with the 30-day notification requirement.

At the commencement of the strategic review the Council's Third Party Register recorded 36 RTOs had third party agreements in place. By the completion of the review, there had been a 30% increase in notifications, with 47 RTOs on the Register.

There is no guarantee that the Register captures all third party arrangements, however, the strategic review has prompted RTOs to review their compliance with the Standards relating to third party arrangements. This has resulted in improved notifications to the Council.

9 FINDINGS and RECOMMENDATIONS

9.1 Findings

The Strategic Review has confirmed initial observations and conjecture about the high prevalence of RTO use of third party arrangements. The 29 RTOs audited recorded 219 third party agreements between them, averaging about seven agreements per RTO.

There are more third parties involved in VET delivery than there are RTOs regulated by the Council and they play a major and critical role in VET outcomes. Training and assessment were the services most commonly outsourced by RTOs to third parties.

The effectiveness of RTO monitoring and oversight arrangements is critical to third party delivery of compliant training and assessment services. Good examples of monitoring and oversight strategies were noted in third party agreements, which would contribute to quality VET outcomes for learners if RTOs follow through on these strategies in practice.

Overall, RTOs demonstrated high levels of compliance with the Standards relating to third party arrangements. Twenty one of the 29 RTOs audited (72%) demonstrated compliance with all the elements they were audited against, an indication that the majority of RTOs are aware of their obligations to third party relationships.

There were a few areas in which RTOs did not perform as well as expected. Almost a quarter of RTOs audited were non-compliant with requirements to inform learners about their consumer rights and refunds in the event of closure or failure to deliver agreed services. Forty four percent of the learners who responded to survey questions about refunds corroborated this audit finding, reporting they were unsure or did not receive the information about refunds. A few non-compliances were also noted where RTOs had failed to inform prospective learners about third parties involved in training and assessment.

RTOs with many third party arrangements reported their main challenges as working out roles and responsibilities and monitoring the third party to ensure products and services are delivered as agreed. The number of third parties an RTO has partnerships with impacts on the resources required for monitoring and oversight and presents other challenges, including on its own operations or any training the RTO itself is delivering.

Survey responses indicated a few third parties may not be aware that RTOs they have partnerships with could be regulated by different VET regulators, which could impact on understanding of their obligations to co-operate effectively with VET Regulators. In spite of some lack of awareness, third parties are to be commended for the high level of co-operation with the Council for this Strategic Review.

There is currently no data available on the number of students engaged in training and assessment services involving third party arrangements. This makes it difficult to assess the risk to learners, clients and industry if these partnerships are not effectively managed.

9.2 Recommendations

1. The high prevalence of RTO use of third party arrangements in VET points to the need to value third parties as major stakeholders in the regulation of the sector.

It is recommended that Council explore strategies to engage with third parties to inform them of their obligations. Strategies could include workshops and Fact Sheets aimed specifically at third parties and the inclusion of third party contacts for electronic mail-out of the Council's *TAC Update* newsletter and Special Bulletins.

2. Third party delivery of compliant training and assessment services on behalf of RTOs is contingent on effective RTO monitoring and oversight.

It is recommended that the workshops delivered as part of the Council's Education Program include topics on:

- a. RTO obligations under the Standards for RTOs for third party arrangements they establish for delivery of VET programs, and
- b. effective strategies and good practice for managing third party arrangements drawn from the good examples of monitoring and oversight strategies noted in the third party agreements reviewed.

3. The finding that 24% of RTOs audited were non-compliant with the requirement to inform prospective learners about refund arrangements in the event of RTO or third party closure or failure to deliver the agreed service is of some concern. Ongoing enquiries from RTOs also indicates further work is needed to improve understanding of regulatory requirements when third parties are involved in delivery of VET services.

It is recommended that Council continue to provide guidance to RTOs and third parties on information for prospective learners, particularly in relation to refunds in the event of third party closure or failure to deliver services.

4. The lack of data on the number of students engaged in training and assessment services involving third party arrangements makes it difficult to assess the risks and impact on learners, clients and industry if the arrangements are deficient.

It is recommended that the Council explore options for the collection and analysis of data on student enrolments and completions to inform risk analysis.

5. The Strategic Review has highlighted the need for a review of information held by the Council on third party arrangements.

It is recommended that:

- a. the Third Party Register is reviewed to determine additional information required to be captured to ensure the Register is current and accurate at all times, and
- b. strategies are explored to enhance the regulation and risk management of RTOs who rely on third party arrangements.

6. The Strategic Review has relied heavily on RTO self-disclosure about their third party arrangements and the Council cannot guarantee that all third party arrangements have been captured on the Third Party Register.

It is recommended that:

- a. RTOs continue to be monitored for compliance by ensuring clauses in the Standards for RTOs relating to third parties are included in any future audits, and
- b. the Council regularly reminds RTOs of their obligation to notify the Council of commencements and cessations of third party arrangements they enter into.

10 Attachments

Attachment A – RTO Survey



TAC Strategic Review into Third Party Arrangements

RTO name:

RTO number:

Value of Third Party Arrangement to RTO

1. What are the advantages of having a third party involved with your RTO?

Please tick all that apply

- Recruit, enrol and train more students
- Expand training operations to other locations
- Access to marketing, promotion and recruitment expertise not available in-house
- Access to training and assessment expertise not available in-house
- Access to equipment and machinery not available in-house
- Access to educational support services not available in-house
- Other

2. From your experience, what are the challenges of third party arrangements?

Please tick all that apply

- Finding a reliable third party to work with
- Working out roles and responsibilities
- Formalising the arrangement with a written agreement
- Monitoring the third party to ensure products and services are delivered as agreed
- Finding the time to manage the relationship
- Managing the relationship when things go wrong
- Ending the third party relationship
- Other

Attachment B – Third Party Survey

Introduction

The Training Accreditation Council (TAC) is established under the *Vocational Education and Training Act 1996* and is an independent statutory body that assures the quality of training and assessment delivered by Registered Training Organisations (RTO) in Western Australia that are registered with TAC.

We are conducting this survey to find out about services third parties provide to registered training organisations (RTO) registered with TAC. An RTO has indicated that your organisation is providing third party services to support its training. It would be appreciated if you could complete this short survey to let us know the types of services you provide.

The survey relates only to the services you (as a third party) provide to the RTO for nationally recognised training. Nationally recognised training is any program of training leading to vocational qualifications and credentials that are recognised across Australia.

For this survey, the meaning of a third party is any party (person or organisation) that provides services on behalf of a RTO for nationally recognised training.

The services a third party provides may include one or more of the following:

- Training services
- Assessment services
- Related educational and support services
- Recruitment of prospective learners
- Marketing services

In this context, the term 'services' does not include:

- student counselling services, mediation services, printing and publication services or information and communications technology (ICT) support; and
- an employment contract between an individual (e.g. trainer) and an RTO.

The survey

- The survey will take anywhere between 5 and 10 minutes to complete.
- If you need to leave the survey, when you reopen the survey a later time it will return to the question you were up to. You will be able to edit responses and complete the survey.
- You can save or print the survey by using the normal icons on your browser.
- When you have completed the survey, please click on the SUBMIT button. Once the survey has been submitted, you will be unable to make any changes.
- All questions are mandatory.

Please complete and return this survey by 12 August 2019

* 1. Please enter your organisation's trading name (Q2)

* 2. Before today, were you aware that there must be a written agreement with the RTO for the services you provide to them?

Yes, I was aware (Q3)

No, I was not aware (Q3)

* 3. Before today, were you aware that the RTO is required to inform the Training Accreditation Council (TAC) about the agreement?

Yes, I was aware (Q4)

No, I was not aware (Q4)

* 4. Before today, were you aware that as a third party you must cooperate with TAC if contacted to provide information about the services you provide?

Yes, I was aware (Q5)

No, I was not aware (Q5)

* 5. Has your organisation previously been registered as an RTO?

Yes (Q6)

No (Q7)

I am unsure (Q7)

* 6. Do you know which regulator your organisation was previously registered with?

- TAC (Q7)
- Another Regulator (Q7)
- I am unsure (Q7)

* 7. Have you or someone in your organisation that is delivering the service on the RTO's behalf, previously worked for an RTO?

- Yes, I have (Q8)
- Yes, someone in my organisation has (Q8)
- No, no one has previously worked for an RTO (Q8)
- I am unsure (Q8)

Arrangement One

* 8. I have a third party arrangement with (Q9)

[please provide only one RTO's trading name, there will be opportunities to list other RTOs later in the survey]

* 9. Thinking about your third party arrangement you just mentioned, please select from below the services you provide on their behalf: (Q10)

[Please tick all that apply]

- Marketing/promotion of training
- Recruiting prospective learners
- Enrolling new learners
- Collecting enrolment fees
- Delivering training
- Conducting assessments
- Developing training and/or assessment materials
- Providing equipment and/or machinery
- Providing a location where the training occurs
- Providing customised learning materials for learners with a disability
- Providing educational support services, such as supporting learners to improve their language, literacy, numeracy and digital skills, study support and study skills
- Other (please specify)

* 10. Thinking about question 9, is there a written agreement with the RTO for the services you provide (Q11)

- Yes, there is a written agreement
- No, we do not have a written agreement
- I am unsure

* 11. Thinking about the services you provide, how do you and the RTO monitor and evaluate the services? (Q12)

[Please tick all that apply] (Q12)

- We have formal meetings
- We communicate informally
- We do not monitor or evaluate the services provided
- Other (please specify)

* 12. Other than the arrangement to provide services that you just mentioned, are there any other RTOs that you provide services for?

- Yes, I provide services on behalf of another RTO (Q13)
- No, I do not provide services on behalf of any other RTOs (End of Survey)

Thank you for completing this survey.

The information that you have provided will enable the Training Accreditation Council to better understand the nature of training services being provided on behalf of Registered Training Organisations in Western Australia.

This will assist in ensuring that students in Western Australia are receiving quality training.

Please click on the Submit button to provide your response.

Attachment C – Student Survey

Training

*** 1. Are you still completing your training?**

- Yes, I am still in training (Q4)
- No, I have successfully completed all of my training (Q2)
- No, I decided not to complete my training (Q2)
- No, I never commenced my training (end of survey)

Certification

*** 2. You told us in question 1 that you have finished your training. Were you issued with a certificate?**

- Yes, I was issued a certificate for the whole qualification I had successfully completed (Q3)
- Yes, I was issued a certificate for units I had successfully completed; I did not complete a qualification (Q3)
- No, I have not been issued a certificate yet, but I have been told me there is one being sent soon (Q4)
- No, I was never issued a certificate (Q4)

Certification

*** 3. Now thinking about your certificate, can you tell us who issued the certificate?**

The name of the organisation on the certificate was:

- The organisation who provided the training
- My employer
- My school
- I don't remember who issued the certificate
- I am unsure
- Other (please specify)

Enrolment Information						
* 4. The next question is about when you enrolled into your course. Can you please tell us what information you received?						
Before I started my training I was given the following information by: (Please select all columns that apply for each line)						
	the organisation that delivered my training	another organisation	my school	my employer	I did not receive this information	I am unsure
where and when the training will be	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
the tools and equipment I needed for the training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
how and when the training and assessments would occur	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
if I didn't agree with assessment decisions, how I could appeal it	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
if I was not happy with the training, how I could lodge a complaint	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
my responsibilities as a student	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
the responsibilities of the organisation conducting the training	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
the cost of the course	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
if the course was subsidised by government	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
if any part of the training did not go ahead, how I could get a refund	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Training delivery

* 5. Still thinking about when you enrolled into your training, was this with the same organisation that delivered your training?

- Yes, the organisation I enrolled with delivered my training (Q7)
- Yes, the organisation I enrolled with delivered part of my training, another organisation delivered the rest (Q6)
- No, the organisation I enrolled with is different to the organisation that delivered my training (Q6)
- I am unsure (Q8)

Training by another organisation

* 6. You told us that another organisation delivered training to you, were you told that another organisation was going to deliver your training?

- Yes, I was told before I enrolled
- Yes, I was told after I was enrolled
- No, I was not told
- Other (please specify)

Enrolment fees

* 7. This question is about the enrolment fees for your training, can you please tell us who paid your fees?

- I paid my fees (Q8)
- My parents (Q8)
- My school (Q8)
- My employer (Q8)
- My employment services provider (Q8)
- I am unsure (Q8)
- I did not pay any money for my training (end of survey)
- Other (please specify) (Q8)

**Enrolment
fees**

8. You advised in the previous question that fees were paid for your training.

Who were these fees paid to?

- My training organisation
- My school
- Another organisation
- Other (please specify)

Thank you for completing this survey.

The information that you have provided will enable the Training Accreditation Council to better understand what training services Registered Training Organisations are receiving assistance with in Western Australia.

This will assist in ensuring that students in Western Australia are receiving quality training.

Please click on the **Submit** button to provide your response.