



Training Accreditation Council

Focus on Quality: TAC Regulatory Strategy 2019-2021

Risk Management

Quality vocational education and training (VET) outcomes are fundamental to the development of a skilled workforce. As a VET regulator, the Training Accreditation Council's (TAC or the Council) primary role is to assure the quality of training services delivered in the VET sector in Western Australia through effective regulation of providers and accredited courses.

The [TAC Risk Framework](#) outlines its risk-based approach that applies appropriate and proportionate regulatory responses in the management of risk at two levels – provider risk and systemic risk. RTOs demonstrating patterns of poor compliance present a high risk to quality training and assessment outcomes and continue to be a concern and key focus for TAC. Systemic risks impact on a group of providers, particular training products or industry areas, or the sector as a whole.

A sound evidence base underpins the risk identification process and an environmental scan (e-scan) is the vehicle for the collection and analysis of data and intelligence. The e-scan and other data and intelligence gathered from engagement activities helps to identify patterns of emerging and persistent systemic risks to the quality of VET and planned regulatory actions to mitigate those risks.

Focus on Quality: TAC Regulatory Strategy 2019-2021

The *Focus on Quality: TAC Regulatory Strategy 2019-2021* informs stakeholders about the priorities the Council has identified as posing risks to the quality of VET during 2019-2021 and the planned regulatory action to monitor and minimise those risks.

In publishing this document, the Council is seeking to engage and motivate RTOs to achieve quality VET outcomes for Western Australia through compliance with the [Standards for Registered Training Organisations \(RTOs\) 2015](#).

The Council considers and responds to risks to the VET sector as they arise. New risks that emerge following publication of this document will be considered and regulatory strategies responding to those risks will be announced via the Council's established communication strategies.

Areas of Focus

During 2019-2021, the Council will focus on the following areas deemed to pose a risk to quality training outcomes. These risk areas are categorised under three main headings - training products, Standards for RTOs and VET pathways:

1. Training Products

Training and Assessment

These cornerstone qualifications are essential to quality outcomes for the whole of the VET sector and remains an area of systemic risk. Changes to the Certificate IV in Training and Assessment effective 1 July 2019 added two new core units – ‘TAEASS502 Design and develop assessment tools’ and ‘TAELLN411 Address adult language, literacy and numeracy skills’.

The regulatory regime for the TAE endorsed by TAC in 2016-2017 will continue. Applications for addition of TAE training products to scope of registration will be subject to site audits, with an emphasis on:

- consistency of staffing, resources and facilities with training and assessment strategies (Clause 1.3);
- trainer and assessor competencies (Clauses 1.13 – 1.16);
- training and assessment strategies and instruments for specific units, including ‘TAEASS502 Design and develop assessment tools’ and ‘TAELLN411 Address adult language, literacy and numeracy skills’; and
- independent validation of training and assessment qualifications (Clause 1.25).

Detailed evidence requirements for addition to scope are published on the [TAC website](#). Trainer and assessor credentials and competency requirements are set out in the [Standards for Registered Training Organisations \(RTOs\) 2015](#).

Construction Industry

CPCCWHS1001 Prepare to work safely in the construction industry

‘CPCCWHS1001 Prepare to work safely in the construction industry’ leads to the issuance of the White Card. In 2018 Ministers responsible for Work Health and Safety commissioned Safe Work Australia to review the content and operation of the model Work Health and Safety Laws. The final report released in December 2018 found that industry and regulator confidence in the White Card continues to diminish due to concerns about duration and content of training, poor training methods and assessment practices and validation of the identity of the cardholder.

In June 2019, WorkSafe WA amended the terms and conditions for RTOs authorised to issue the Construction Induction Training (White) Cards. The new measures ensure RTOs issue the White Card only to learners located in Western Australia at the time of assessment.

CPCCWHS1001 was a focus of the 2017-2018 Regulatory Strategy due to significant changes to assessment requirements and will continue to remain so during 2019-2021.

Applications to add ‘CPCCWHS1001 Prepare to work safely in the construction industry’ will continue to require an audit. Audits will look at amount of training, training and assessment practices, and RTO verification of identity of learners to ensure the person enrolling is the same one assessed and issued with the White Card, particularly where delivery and assessment is occurring online or by real time audio-visual media.

Heavy Vehicle Training

TLIC3004 Drive heavy rigid vehicle – linked to Heavy Rigid (HR) licence

TLIC3005 Drive heavy combination vehicle – linked to Heavy Combination (HC) licence

TLIC4006 Drive multi-combination vehicle – linked to Multi Combination (MC) licence

To obtain a heavy vehicle licence candidates must complete the relevant unit of competency before undertaking a Practical Driving Assessment (PDA) conducted by the Department of Transport's Driver and Vehicle Services centres or by Authorised RTOs contracted by the Department of Transport.

National reports on corruption in heavy vehicle training in 2017 and subsequent investigations by the Department of Transport in 2018 has led to some RTOs having their authorisation to conduct PDAs revoked and the cancellation of registration for some RTOs. Total VET Activity data and Department of Transport data on the number of PDAs conducted shows high levels of activity in the unit 'TLIC3004 Drive heavy rigid vehicle'.

Monitoring audits agreed in the 2018-2019 strategy for heavy vehicle training will be progressed in consultation with stakeholders and are expected to commence in the second half of 2019.

RTOs applying to add the units of competency linked to heavy vehicle training to scope of registration will continue to undergo a site audit.

Security Qualifications

CPP20218 Certificate II in Security Operations – linked to Crowd Controller, Security Officer

CPP31318 Certificate III in Security Operations – linked to Unarmed Bodyguard, Cash in Transit

CPP30607 Certificate III in Investigative Services – linked to Investigator

CPP40707 Certificate IV in Security and Risk Management – linked to Class IV Installer

CPP50611 Diploma of Security and Risk Management – linked to Class IV Installer

Security qualifications are linked to licenced outcomes and have been categorised as high risk since the Council's 2009-2010 strategic industry audit.

The Council has a Memorandum of Understanding with the Western Australian Police Force, the industry regulator, covering the Certificate II and III in Security Operations, Certificate III in Investigative Services, Certificate IV in Security and Risk Management and Diploma of Security and Risk Management.

Revised security qualifications released in January 2019 are not equivalent to the superseded qualifications, and RTOs are required to apply to Council to add the new qualifications to scope of registration. RTOs delivering these qualifications are required to comply with Commissioner of Police Conditions, one of which mandates minimum hours for face-to-face training and assessment.

Security qualifications remain an area of risk focus. Applications to add security qualifications to scope of registration will require a site audit.

Further consultation with Western Australian Police Force and the relevant Western Australian training council will occur on revisions to mandated hours and confirmation of the focus of addition to scope audits. A strategy will be considered if required.

High Risk Work Licences

The high level of workplace fatalities and injuries continues to be an area of concern. The Parliament of Western Australia's Standing Committee on Public Administration Inquiry into WorkSafe commenced in 2017 is yet to publish its findings. The terms of reference for the inquiry included the adequacy of training provided by RTOs delivering high risk work licencing (HRWL) training.

Many of the HRWL units of competency and related qualifications were reviewed in 2018-2019 and were recently endorsed, or are due to be approved in the near future.

Units of competency linked to the issuance of HRWLs and related qualifications remain an area of risk focus. Applications to add units of competency linked to the issuance of HRWLs will require a site audit.

Health and Community Services

Community services qualifications

HLTAID003 Provide first aid

The focus on the community services and health industries continues with the Royal Commission into the aged care sector and the recently established Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability. In addition, the Western Australian and Australian governments have outlined budget and skills initiatives aimed at growing the social assistance and allied health workforce in response to the increasing demand for those services.

The mandatory 120 hours work placement required for the CHC33015 Certificate III in Individual Support was reported to be problematic because of difficulty securing work placements in some situations. High volume enrolments, short course duration and a growing trend towards more assessment than actual training were reported for some qualifications.

First aid is extensively delivered either as a stand-alone unit or packaged into numerous other qualifications. Growing concerns about the quality of training, particularly in relation to online delivery, industry currency of trainers and assessors and equipment, warrant a specific risk focus on first aid.

The Council will continue to monitor compliance in the health and community services sectors, including training products linked to aged care, home and community care, early childhood and disability support.

Further consultation with stakeholders will inform development of an appropriate risk strategy for the unit 'HLTAID003 Provide first aid' during 2020.

2. Standards for RTOs

Amount of Training (Clauses 1.1 and 1.2)

Assessment (Clause 1.8)

Trainer and Assessor Competencies (Clauses 1.13 – 1.16)

Concerns about RTO assessment practices and amount of training persist. The concerns most frequently raised by stakeholders consulted in the e-scan were in relation to assessment practices, amount of training, industry currency of trainers and assessors and online delivery. Responses from the 2018 Biennial RTO and Stakeholder Survey reflected similar concerns. Audit outcomes data for 2018-2019 identified training and assessment strategies (Clause 1.1) and assessment (Clause 1.8) as the areas of highest non-compliance with the Standards.

Issues reported in relation to the interaction between institution-based training, work-based training and work experience are linked to considerations about amount of training. Increasingly, training packages are stipulating mandated work placement hours.

Market pressure is a factor influencing consideration of course duration and amount of training. In a growth market with increased workforce demands, training providers are under pressure from both employers and learners to deliver training in shorter timeframes.

With high levels of non-compliance and ongoing industry concerns, there is a continued focus on amount of training (Clauses 1.1 and 1.2), RTO assessment practices (Clause 1.8) and trainer and assessor competencies (Clauses 1.13-1.16) as areas of systemic risk.

Further, audits conducted during 2019-2021 will focus specifically on amount of training, assessment and trainer/assessor competence for the unit of competency 'CPCWHS1001 Prepare to work safely in the construction industry', health and community services qualifications and qualifications delivered through apprenticeship, traineeship and VET delivered in secondary schools pathways.

Third Party Arrangements (Clauses 2.3, 2.4, 4.1, 5.2, 5.3, 5.4, 8.2 and 8.3)

Third party arrangements were identified in the 2018-2019 regulatory strategy as an area of concern, and a Strategic Review into Third Party Arrangements is being undertaken.

Services outsourced to third parties by TAC registered RTOs include training; assessment; language, literacy and numeracy; enrolment; marketing; support services; fee collection and recruitment.

Third party arrangements enable RTOs to expand their offerings to a wider market, however, they also carry a high risk of poor training outcomes if not effectively managed.

A strategic review is in progress and the Council will continue to monitor compliance involving third parties.

3. VET Pathways

VET Delivered in Secondary Schools

VET delivery in secondary schools (VDSS) is now the most common education pathway for year 11 and 12 public school students. VDSS continues to be an area requiring attention with concerns related to provision of training and assessment in school environments that do not reflect training product requirements and do not provide learners with experiences that reflect real workplace situations. Delivery of some qualifications was reported to be packaged in ways that industry had flagged as not being appropriate. Some RTO schools were noted to have limited understanding of their role and obligations as an RTO, and trainers and assessors did not have industry currency due to lack of engagement with industry.

VDSS is mostly delivered through third party (auspice) arrangements. The Department of Education has introduced a new tender process to establish a panel of private RTOs for the delivery of VDSS in Western Australia through auspice arrangements.

VDSS remains a risk focus during 2019-2021. Audits of RTOs delivering qualifications through VDSS pathways will focus specifically on amount of training, assessment and trainer/assessor competence and industry skills.

The outcomes of the Strategic Review into Third Party Arrangements and consultation with stakeholders will inform consideration to the development of a further risk response for VDSS if required.

Apprenticeships and Traineeships

A growing trend reported that some delivery of apprenticeships and traineeships centred more on formal assessment than actual training delivery. Apprenticeships and traineeships all incorporate work-based training arrangements. Confusion around how institution-based training, work-based training and work experience interact in traineeships and apprenticeships was also reported. Amount of training is at the heart of these issues.

Apprenticeships and traineeships are included as a risk focus during 2019-2021. Audits of RTOs delivering qualifications through these pathways will focus specifically on amount of training, assessment and trainer/assessor competence and industry skills.

Further consultation with stakeholders will inform development of an appropriate risk strategy during 2020.

TAC Education Program

Education is an important regulatory strategy to encourage and promote compliance. The Council will continue to deliver an education program that builds capability and understanding of RTOs and their staff to meet their obligations in regard to the Standards for RTOs.

Analysis of data from audits, complaints and stakeholder consultations informs decisions about education programs. The 2018 Biennial RTO and Stakeholder Survey and survey responses from participants of TAC workshops conducted in the last 12 months confirmed most desired topics to be:

- preparing for audits
- assessment and validation
- RTO governance
- compliance for RTO managers
- trainer and assessor requirements
- amount of training
- industry engagement
- employment based/work placement arrangements - roles and responsibilities of the RTO and the workplace in training and assessment
- impact of regulatory change and VET reforms on the sector and RTOs.

Education Program workshops, fact sheets and guidance material to be developed will have consideration to topics identified by RTOs and other stakeholders.

TAC currently offers workshops for a number of these topics and these will continue. The highly subscribed three-part workshop series on assessment – 1) Developing Assessment Systems, 2) Designing Assessment Tools and 3) Assessment in Practice – will continue to be offered to provide guidance to RTOs.

Workshop dates and new guidance material published are promoted via TAC's established communication strategies including TAC Special Bulletins, TAC Updates, the TAC website www.tac.wa.gov.au and the Department of Training and Workforce Development's *VETinfoNews* newsletter.

The Council is committed to responding to State-based priorities and risks in a timely manner. Provider and systemic risks are variable and influenced by a range of risk factors. The nature and scope of the Council's regulatory responses will vary according to the nature and severity of the potential consequences should the risk be left untreated.

Further information about the Council's risk approach is contained in the [TAC Risk Framework](#).