

**Issue 5
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Inside this Issue

- The NEW ish AQF
- BSZ is almost dead
- ITA
- Australian Training Awards
- Consultants—the good, the bad and the rest
- Ten Years On
- Nostradamus

The VET Gazette is a collection of information and relevant stories about goings on in the Vocational Education and Training sector. The VET Gazette is a free publication distributed every couple of months and hopefully includes stories and articles containing something for everyone.

If you are receiving The VET Gazette through a colleague and you would like to be on the mailing list, please [subscribe here](#) and you will automatically be added to our database.

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The NEW ish AQF

Without too much fanfare, a new AQF was introduced to the VET sector back in July 2011 and with so many other changes happening simultaneously at that time, it went largely unnoticed. In the last VET Gazette we mentioned that we would provide a summary of the changes and I must say I was ready to do that until I read an article recently which seemed somewhat confusing. This is a summary, NOT a full analysis and before we look at some specifics, I am somewhat bemused as to why some bodies or people in the sector feel the need to keep changing the terminology we use. In this case, the names of the various 'bits of paper' a person is entitled too can be, well, confusing.

Firstly let's look at some obvious changes.

The AQF now includes a number of new requirements for RTOs and it is a reminder that the AQF is part of the overall framework and it is NOT just the AQTF or SNRs that RTOs need to comply with. From the outset, please also note that the AQF applies across the entire tertiary sector and you'll note that some of the changes are aimed more at the higher education part of the tertiary sector.

What is new for RTOs, or at least clarified is:

- AQF Qualifications Issuance policy
- AQF Qualifications Pathways policy
- AQF Qualifications Register policy
- AQF Qualification Type Addition and Removal Policy

Qualifications Issuance Policy

In August 2011, a [bulletin](#) written by the NQC appeared on the NSSC website. In part it brought the AQF into more prominence from a regulatory perspective. The bulletin states that RTOs must have current and readily available policies and procedures that detail its procedures for compliance with the AQF Qualifications Issuance Policy. This would include such things as Protection of Titles, Authority to Issue Qualifications, correct nomenclature is used, registers are maintained for 30 years etc. So it is a new procedure we need to add to the list of those we are required, as RTOs, to have.

The issuance policy outlines that when a person completes a full AQF qualification they are entitled to a [testamur](#) and a [record of results](#). Now we assume that the 'testamur' is what we have always just simply called a qualification and if you check the definitions table in the AQF you'll see that "In Australia this (a testamur) may be called an 'award', 'parchment', 'laureate' or 'certificate'."

AQF cont'd

A record of results is defined as something that we may have called a 'transcript of results', 'academic transcript', 'record of achievement', or 'statement of results'. It is NOT a statement of attainment.

The policy further states that a person who completes only part of a qualification is entitled to receive a record of results. Where this has become confusing is that the definition of a record of results which you will notice above does not include a statement of attainment. Even more confusing, in the context of the above, the record of results would simply be that, a piece of paper that outlines what the student achieved and what they didn't achieve. If the student had completed some units on the way to the qualification, then they would receive a statement of attainment for those units.

Why do I say this? Well if you look at the Standards for NVR RTOs 2011, it refers to qualifications and statements of attainment. There's no mention of these other '*names for various bits of paper*'. You'll also notice in the latest NRT logo specifications that qualifications and statements of attainment are the only words mentioned, not all those other words and the ASQA website itself is referring to the names we know.

I also spoke with the AQF Council to clarify this and they confirmed that the situation had not changed substantially. A student who completes only part of the qualification will receive a statement of attainment for those units completed. An *optional* record of results may also be awarded and this would simply include those units which the student attempted but didn't achieve competence in. Notice the word '*optional*'. A record of results may also be the document on which a student's grades may be included in situations where grading or Performance Level Assessment is used.

The other slight changes in this policy are:

The introduction of the AQF logo - you may use the logo on qualifications only (not on statements of attainment) but you cannot use the logo *AS WELL AS* the words 'the qualification is recognised within the Australian Qualifications Framework. It is one or the other (logo or words).

Another change that is less obvious is the template wording for a statement of attainment. Under the old AQF we usually included a statement at the bottom stating that:

'This Statement of Attainment is recognised within the Australian Qualifications Framework'. This wording no longer appears on the template provided.

BSZ is almost dead

At the back of the AQTF Users Guide, reference is made to two appendices which refer to some NQC determinations about trainers and assessors qualifications. Rather than going over it all, suffice to say that Trainers/assessors who are relying on the old BSZ40198 Certificate IV in Assessment and Workplace Training for audit compliance, have until **17th June 2012** to make the transition to the newer training and assessment qualification, TAE40110. If you have TAA40104, you do not need to upgrade.

We have recently implemented an online enrolment system specifically for this purpose which has the capacity for the applicant to upload their evidence instantly. If you require an RPL upgrade to TAE, please enrol online [here](#). The price for an upgrade starts from \$250 depending on the evidence requirements.

ITA

Being involved with the AQTF since its inception, I have seen the development of the standards to where they are today and along that journey, the requirement for RTOs to identify and manage continuous improvement has become more prominent. It's not just a compliance issue, it makes good sense to identify where improvements are likely to come from, record them, act upon them and then implement measurable positive change.

ITA the **I**mprovement **T**racking & **A**nalysis database was developed specifically for RTOs to record, manage and implement information and then generate numerous reports showing the trends in improvement. **ITA** reduces the need for several registers and is completely auditable.

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Australian Training Awards 2012

In 2011 I was engaged as the evaluator in the judging process for the Small Training Provider of the Year category of the Australian Training Awards. It was great to see such a wide range of innovative practice in RTOs around the country. Each of the eight State and Territory finalists was considered in the short listing process which resulted in three finalists being selected. A site visit to each of the finalists gave me an opportunity to see some great practice in action. Congratulations to not only the winners of each category but to all finalists who continually strive for excellence and improvement. [2011 Winners and Runners Up](#)

DEEWR recognise and reward individuals and organisations for their outstanding commitment and contribution to building a skilled and productive Australia. The 2012 Australian Training Awards encourage individuals and organisations to apply for direct entry to:

1. The National Focus Categories – for outstanding contributions made by individuals, schools, businesses and organisations towards the attainment of Australia’s national vocational education and training (VET) system priorities. The National Focus categories for 2012 are:

- [Australian Apprenticeships - Employer Award](#)
- [School Pathways to VET Award](#)
- [Community Pathways to VET Award](#)
- [Skills for Sustainability – Educational Institution Award](#)
- [Leadership in Quality Award](#)

2. Lifetime Achievement Award – is Australia’s most prestigious VET award and is presented to an individual who has an established history of distinguished service and has made a lasting contribution to VET practice. Someone who is generally acknowledged as having reached the pinnacle of their profession or industry? Nominate someone for the pre-eminent award for the VET sector Lifetime Achievement Award. This award was presented for the first time in 2011 to Stella Axarlis AM and the Lifetime Achievement Award 2012 will again acknowledge an outstanding individual who has made a fundamental and lasting contribution to VET.

3. International Training Provider of the Year Award – Can your RTO demonstrate outstanding achievements in all aspects of the delivery of vocational education and training to full-fee paying international students? Your organisation could be eligible to apply for the inaugural International Training Provider of the Year Award. Ensure your RTO is recognised and rewarded for its excellence by nominating for this Award.

Applications for these awards are made directly to the Australian Training Awards and close on **Thursday 31st May 2012**. These awards will be presented at the 2012 Australian Training Awards in Melbourne on Friday 16th November. For further information on entry requirements and award criteria, visit www.australiantrainingawards.gov.au or call (02) 6240 6848 and follow us on twitter @AusTrainAwards.

Consultants—the good, the bad and the rest

Over the years we've been in this business, we have had calls from people who have been through audits and struggled with audit compliance on the day. It is understandable in many cases, as regulations just seem to be getting more and more confusing as time goes by. It is more perplexing and frustrating for the client, when they have engaged the services of a consultant, only to be 'whacked' with the audit stick anyway. I have lost count of the times I have gone on rescue missions and I feel very strongly for these clients who have paid good money for very little result.

So how do you pick a good consultant from a not so good consultant? Let's look at some facts.

- Most of them say that they have never had a client fail an audit
- Most of them say that they have been doing it for a long time
- Most of them have impressive websites listing a range of services which arguably many of them don't do very well at all

Here's another fact. There is no genuine certification scheme in Australia for AQTF consultants. The only international scheme which could be comparable is the Certified Management Consultant scheme whose rules include that to be certified, an applicant must:

- have a minimum Bachelor degree from a recognised university
- three or more years of experience in full time consulting
- demonstrated client satisfaction in challenging environments
- written and oral ethics exam and adherence to a code of ethics
- commitment to ongoing professional development
- produce descriptions of client engagements including problems addressed, solutions provided and results achieved

Whilst various organisations have published guides on how to pick a good consultant, questions have to be raised when consultants on these lists continue to fail their clients. So let's apply some everyday common sense just like you would if you required financial assistance (Accountant) or legal advice (Solicitor).

My advice about what you should be looking for:

- Someone with a lot more than a Certificate IV in Training and Assessment qualification as this piece of paper can be obtained in a week. It is very clear that a consultant needs to have extensive knowledge of all things education and a good sense of how business operates.
- Someone with at least 3-5 years full time experience in consulting and in business.
- Ensure the consultant you engage is suitably insured (professional indemnity and public liability).
- Request genuine referrals from their last three clients who had similar requirements.
- **Before paying any money**, ask for a written agreement or terms of engagement from the consultant outlining the job to be done, the responsibilities of each party to the agreement, timelines and contingencies.

Ten Years On

Over the last six months it seems like almost every time I speak with Queensland RTOs all the talk is about national regulation. Whilst most other States have made some form of commitment to ASQA, at the time of writing this article, Queensland has not. The rumour changes from week to week so again, until Queensland RTOs are officially informed, we continue to work under the AQTF for now.

It looks as though ASQA will have national coverage or at least the bulk of RTOs by 30 June. As we usher in a new era, a timely notice was in the recent (April) NSSC Communiqué that amongst other things, advised us of a review into Standards for RTOs, Standards for the regulators and their Course Accreditation function as well as data collection.

I am pleased that there is a review on at this time because reading various blogs, audit reports and speaking with colleagues interstate, I sense that there is still some major inconsistency in audit outcomes. We must remind ourselves that this was one of the major platforms on which ASQA was built – consistency in audit outcomes.

I watch with great interest the existing Standards for VET Regulators 2011 which is SVR 4 states (inter alia) that -

- 4.3 Consistency in auditors' judgements is maintained through moderation of audits at all levels.
- 4.4 Sanctions and conditions applied to RTOs are in accordance with legislative requirements and are applied consistently. (emphasis added)

Whilst I do not intimately know how things work within each of the (old) regulatory bodies, I know what happens in Queensland. Internally there's a lot of consensus and moderation going on so that the auditors have consistent application, however, after reading audit reports from other jurisdictions, it is apparent that there has been little communication across jurisdictions. In fact after recently reading an audit report, I had to wonder what framework the auditor actually audited.

So a great challenge lies ahead for ASQA to find this consistency across the entire country.

The aforementioned Standards also states that -

- 4.1 VET Regulators must continuously improve national consistency in registration functions by acting on relevant data and by internal and external benchmarking against national regulation.

When I work with RTOs on building systems so that the business benefits from continuous improvement efforts rather than doing it just to keep auditors happy, one of the major points we cover is firstly understanding the difference between continuous improvement and continuous change.

Improvement is measurable. If you can't measure it, you cannot improve it. We all talk about cycles and one thing about the cycle is that you end up where you started. Are we undergoing continuous change? So my questions are - As we change the regulatory standards again, are we improving them or more importantly, is the quality of the product coming out of an RTO improving as a result of us changing the regulations? Are we making the standards too complex so we spend all our time making sure we can pass an audit rather than concentrating on high quality training and assessment?

Has anyone ever measured what things are like now in RTOs compared to what they were like in 2002?

Whilst this may sound pessimistic, I don't believe we've come that far in our sector in 10 years in this respect. What we found non-compliant in 2002 is still what we find non compliant today. We've had a lot of change but how much improvement can be measured?

I have been auditing the AQTF since 2002 which is just over ten years and in that time I have completed over 500 AQTF audits under contract to the Queensland State Training Authority, through NARA and for private clients. Disappointingly, the audit reports I write today seem very similar to those I wrote in 2002.

ASQA's main brief it seems is to have some standardisation in audit outcomes. My question is, how difficult is this to achieve?

During the time I have been auditing the AQTF there have been some attempts made to have national consistency in audit outcomes and I must say that NARA focused heavily on this and were having some success before they folded. Every other attempt I have seen through a process of National audit moderation, has failed.

So why have the attempts at consistency failed?

In my view there are two main reasons. Firstly the obvious one is that auditors from the various jurisdictions haven't sat down and had the discussion about audit findings in their respective jurisdictions. Over the years I have been to at least eight of the ten National Moderation Workshops and have walked in with twenty questions and walked out with forty. There has rarely been any consensus reached because everyone interprets everything differently and rarely is agreement reached. So, we walk away and accept that we are all different. We (auditors) need to try harder.

So how do we fix this?

I believe there is a solution but it will need some work. ASQA's organisational chart shows a number of positions of National Manager for various roles and these sit under the Commissioners. It doesn't appear obvious which one of the National Managers will take responsibility for overseeing the consistency of audit reports and at least in the immediate future, this will be crucial to the success of the National body. One would think that under a national system, consistency should be easier to achieve but it will come with some pain no doubt.

Through discussions I have had with colleagues and clients and the various audit related blogs online, it seems a major issue for RTOs that they are being forced to make system changes based on what an auditor wants not on what is necessarily good practice or value adding. The auditor drives the system and makes RTOs add layers of processes with little or no value. In the worse case scenario, a legal challenge is mounted (for those RTOs who can afford it) and the whole process is dragged through a tribunal or court and in many cases over the most trivial scenario. For an experienced auditor, it is not difficult to determine a poor quality RTO from one that doesn't pay attention to detail. It seems incomprehensible that RTOs are still being put through the ringer for low risk non-compliances (and in some cases trivial in my view) but we probably all know of RTOs whose graduates can't do what it says on the piece of paper they received. So who is the real villain?

For those people who know me, you know that I am an absolute advocate for quality training and I want the bad RTOs stamped out like everyone else.

The second reason and probably the cause of the first one, is that the standards themselves are only descriptive, giving little guidance to the RTO and the auditor. RTOs simply want to know what they are required to do and whilst it pains me to know that a lot of RTOs seem to spend most of their time working out how to 'meet audit requirements', it is neither fair nor remotely progressive to continue a punitive model where the 'crime' is created by the interpretation of an auditor.

Under the 2002 and 2005 version of the AQTF, RTOs were required to develop policies and procedures, strategies, learning materials, assessment etc. in a quite prescriptive way. For example, RTOs were required to 'develop policies and procedures...' rather than 'have a system to ensure...'. RTOs either had it or they didn't and if they didn't, the standards told them what they needed to have.

In 2007 there was a major shift away from prescriptive standards with only a few shades of grey, to very descriptive standards which have more shades of grey than a dulux colour chart. I can recall at the time, stakeholders (whoever the consultants spoke with) said that the standards were telling RTOs how to run their business and in a way they were. But what they were doing was giving a lot more guidance than what we have now i.e. we knew what crimes we'd be charged with because we could see a lot more clearly what we were required to do.

Remember what I said earlier, that I've audited AQTF since day one and have done over 500 audits. The fact is I write reports now that contain the same issues I was reporting in 2002. So how far have we come?

In the 2007 change there was also the removal of a few fairly important underpinning principles of quality management and again one wonders why. Removed in 2007 was the requirement for RTOs to audit themselves at least once a year, conduct a risk assessment of their operations and their ability to continually meet the standards and to develop a business plan amongst other things.

Whilst there was a strengthening of the continuous improvement aspect, there seems to have been a weakening in other areas. What the post 2007 standards represent is more of a 'retrospective Quality Assurance model' which, by definition, would be looking at what has already happened and passing a judgement on that. It can be argued that the pre 2007 versions of the AQTF were more 'prospective QA models. Prospective QA is much more forward looking.

So really, since 2007, the AQTF has looked more at what an RTO has done rather than what it intends to do. These days the regulation only seems to be interested in the plan at the initial registration stage.

So to my point: At the start of this article I mentioned a review was underway. This is referenced on the NSSC website in an April 2012 communiqué. Part of the communiqué states that a consultation paper will be distributed in the process and I encourage all RTOs to become involved in this review. Please, check the newsletters and write in. If we influence the standards we can influence how the standards are regulated.

Whilst it may look more attractive to have a set of standards which 'allow flexibility in providing evidence' and 'standards that focus on RTO quality outcomes' and that reflect the modern approach to regulation (whatever that is) a few things cannot be ignored.

1. Auditors can only audit standards. If the standards are open ended, so too will be the auditor's decisions.
2. A company CANNOT ensure a quality outcome without controlling the inputs. In an RTO setting, these are typically policies and procedures.
3. RTOs must focus on quality in the future rather than worry about what auditors may think of their past.
4. EVERY process in a business must be able to have a value attached to it, otherwise it is pointless to do something or create a form for example that has no value.

Nostradamus

I will predict something now if it hasn't already happened. Recently, two Diplomas were included in the TAE training package that we haven't had in that package to date. These are both extension qualifications for trainers, one focussing on more advanced training and one on design and development of programs etc. They are:

- TAE50111
Diploma of Vocational Education and Training and
- TAE50211
Diploma of Training Design and Development

In the past, quite a few RTOs have advertised that a person must have a Diploma if they run an RTO. It happened with BSZ50198 and with TAA50104. Now unless there's a complete change of regulatory thought, there's a very strong chance that this will be NOTHING BUT MARKETING so don't get caught out by aggressive marketing. By all means do the professional development if you want advanced training and assessing or design and development skills but if history repeats, I very much doubt that these qualifications will be mandatory qualifications for those who run RTOs.

2012

We continue to receive great feedback on The VET Gazette most being about simple language used and explanation of what often seems confusing. Many people have also asked us to take the philosophy of The VET Gazette on the road in the form of professional development workshops presented in simple everyday language. In 2012, we'll be doing just that in response to the emails and phone calls we have received so watch our website for further details and register your interest.

Remember what our old mate Aristotle said:

We are what we repeatedly do. Excellence therefore is not an act but a habit.

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