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Regulating and quality-assuring VET: international developments

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About the research

Regulating and quality-assuring VET: international developments

Josie Misko, NCVER

The opening-up of the market for education and training, including vocational education and training (VET), has increased the importance of regulation and quality assurance mechanisms in ensuring the integrity of qualifications. This report investigates approaches to the regulation and quality assurance of vocational education and training in a number of countries: New Zealand, selected European member states (Finland, Sweden, United Kingdom), Canada (province of Ontario) and two accrediting agencies in the United States. The insights gained from this investigation into the practices applied overseas could be used to inform the development of VET regulatory and quality assurance approaches in Australia.

Key messages

- Increasingly, training systems are implementing principles of responsive regulation and risk analysis to help ensure compliance and to reduce the burden on regulators and regulated populations. However, the implementation of these approaches requires regulators to have access to sufficient and robust data collection mechanisms to help them to identify effective triggers for risk-based reviews.

- The voice of industry (including employer and employee associations) is commonly heard in the development of qualifications, assessment for qualifications, the provision of practical work experience, and validation of assessments.

- Debates about the quality of teaching are gaining momentum, not only in Australia, but also overseas. The aim is to implement mechanisms to improve the quality of teacher preparation and to ensure continuing professional development.

- External assessments conducted by third parties possessing relevant occupational knowledge and expertise can be used to assure the integrity of assessments and qualifications.

- The New Zealand external evaluation review (EER) approach is worthy of attention, especially as it aims to help providers to develop their capacity for self-assessment. However, a lesson from their experience is to make clear decisions about how to promote the approach to providers to ensure that trust between regulators and providers is maintained.

- The preparation of institutional self-reviews or reports helps to embed self-monitoring mechanisms into the routine actitivities of providers. However, such processes, if not well managed, can become so resource-intensive that they may draw valuable resources away from core teaching and learning tasks and so hinder the achievement of real continuous improvement.

- Outcomes-based measures of institutional performance can help individuals to make informed choices about where they want to study, and governments to make policy and funding decisions. Their usefulness is highly dependent on the robustness and accuracy of participation and outcomes data and the mechanisms for data collection.

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Acknowledgment

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🖊 Executive summary

The general principles and practices of regulatory and quality assurance systems for vocational education and training (VET) and other education sectors at home and overseas are converging. In this paper we review relevant Australian and international literature relating to the regulatory models and frameworks applied in the training sector but also in other industry sectors with relevance for VET. This is important to ensure that the lessons learnt by others in implementing regulatory standards in similar contexts are recorded and understood.

Overview

The review of the literature has found that, although the details of the regulatory processes followed may differ, many of the issues confronted by and important to VET regulation in Australia are often being experienced in education and training systems overseas.

Common in many systems are provisions for: initial provider registration and accreditation (including provisional registration or equivalent); frameworks for qualifications; and institutional self-reviews (self-study, self-assessment) combined with external reviews (often including desk-top audits, on-site visits and third-party assessments). In some countries site visits include observations of teachers and learners in institutions, as well as visits to employers and observations of learners at workplaces.

The adoption of objective measures on the outcomes of performance for systems, providers and students is also gaining traction and encompasses student learning and competency outcomes, graduate destinations, and employer and student satisfaction with training. In some countries output measures (such as numbers of participating students, teachers and employers, and hours of training delivery) continue to be used to signal quality. Although there is increasingly a shift towards continuous improvement, as opposed to strict compliance with rules regimes, in many systems the need for and use of external accountability combined with internal quality assurance regimes remains high.

Risk-based approaches to reducing the regulatory burden on the regulated and the regulator and to ensuring the efficient use of resources are also being commonly applied. This is especially the case for those systems which have given substantial independence and autonomy to providers. The identification of key risk factors helps regulators to establish audit or review schedules and to focus reviews on specific issues.

Not surprisingly, the key quality standards and/or areas of focus in many quality systems cover similar issues. These include ethical and legal considerations and good business and financial management (including ownership and financial sustainability); competent staff for administrative operations (including management and leadership); appropriately qualified teachers, trainers and assessors; accurate and timely information to students prior to enrolment to enable them to make informed selections; and non-misleading marketing strategies.

There are also definite moves to increase the transparency of information about the expectations and outcomes of service provision. Across systems and sectors, transparency

initiatives are promoted as ways of helping governments, systems, providers and clients to make informed decisions. Nevertheless, what are considered to be traditional approaches to ensuring quality continue to operate (for example, defined curriculum and qualifications, external examinations and inspections). Mechanisms to regulate and quality-assure providers eligible for government funding are also used in voluntary systems, as in the United States.

Key observations

It is clear that any quality system and its associated standards need to address the mission and related objectives of an organisation. Standards-based systems, as well as those based on objectives, require regulators to have a clear idea of the intentions of the standards and objectives they want to apply or pursue, and to ensure that these are communicated to those who are to implement them in a clear and easily understood manner. Developing standards or objectives, however, is not just about the language used or the level of prescription required. It is also concerned with identifying what these standards should cover. Arriving at these decisions cannot be done in isolation, and across industry sectors at home and overseas there is substantial evidence to show that broad consultation before implementation is critical.

Increasingly, both educational and regulatory systems are focusing their efforts on improving quality, including the qualifications of the VET workforce. The standards for entry-level teacher training and continuing professional development emphasise the need for teachers and trainers to understand their specific disciplines or trade areas as well as the pedagogy of training and assessment. Suggestions are made for the creation of a 'master VET practitioner' or 'master teacher' category and for providing qualifications that would enable those with general teaching qualifications to acquire VET teacher qualifications. There are also suggestions for a professional association for Australian VET, which would eventually be responsible for accrediting or registering teachers and trainers; a mentoring system for beginning teachers; and a formal teaching scholarship centre, which would focus on the pedagogy of VET. The qualifications of teachers differ across jurisdictions, with some jurisdictions requiring teachers to have higher education qualifications as well as industry experience.

The quality of assessments is also a key concern. This includes the consistency of assessment judgments across different assessors and for all individuals being assessed. Also important to the debate is the validity of assessments. Assessment burden and cost are identified as key disadvantages for systems that rely heavily on external assessments. A related issue is the undervaluing of underpinning knowledge and understanding in favour of demonstrated practical competency. This is a consideration for those countries that have adopted a competency-based assessment approach. Skills demonstrations by learners are also being used in external assessments.

Engagement with industry stakeholders is considered to play a key role in the development and implementation of quality systems and associated quality standards and/or objectives at both regulator and provider levels. In some countries industry has a formal role, not only in the setting of examinations, but also in the assessment of outcomes. Involving those to be regulated in the development or review of standards is also being practised and/or promoted. As well as helping to build trust, good relationships between the regulated and

the regulators can assist in the development of locally relevant standards. It is acknowledged that a system should be vigilant in maintaining standards that reflect changes in social and economic conditions.

Responsive regulation (including light-touch approaches combined with increasingly more punitive measures, if required) is also gaining favour and is being adopted in a number of public agencies, including the Australian Taxation Office and the National VET Regulator (the Australian Skills Quality Authority [ASQA]). Responsive regulation is based on the belief that the natural inclination of the regulated community is in fact to comply rather than not with standards and regulations. A light touch is characterised by increasingly more favourable treatment for compliant behaviour and increasingly more severe sanctions for transgressions. This approach is supported by the findings of a number of empirical studies which have shown that praise has resulted in increased levels of compliant behaviour, while 'shaming' resulted in decreased levels. The general practice is to address early non-compliant behaviour by attempting to understand the reasons for the behaviour and providing support designed to return the organisation to a situation of compliance. Clarity of purpose, transparency of expectations, trust between regulators and the communities they regulate, and reduction in both regulatory effort and the costs of compliance are promoted as key features. These features are to be reinforced by clearly defined and consistently applied regulatory sanctions of increasing severity for transgressions.

Adopting a risk-based approach to regulation is also favoured by commentators on regulatory compliance. Such an approach ensures that complying providers are not subject to unnecessary regulatory burden; this approach also assists in concentrating resources where they are most needed. To make best and efficient use of regulatory resources, a regular scan of the regulatory environment is suggested to help to identify and prioritise emerging risks, which can then be addressed. It is also important for regulators to understand the root causes of issues and to address these via a combination of regulatory strategies, including sanctions. In addition, regulators may need to understand how the policy of one sector may impact on behaviour in another. For example, market mechanisms in the VET sector have provided an opportunity for exploitation and abuse (with regard to international education).

Becoming more common is combining self-assessment or review processes with external review by regulators and other third parties. This approach is also promoted as a way of reducing unnecessary burden. In systems which make significant use of a self-review or self-study process (Ontario, New Zealand, United Kingdom, South Africa and United States), the training organisation must undergo self-review to determine whether it considers it has complied with requirements.

No matter what approach is taken in regulatory practice or assessment of training, the need for developing standards and practices that allow the consistent interpretation and implementation of standards remains. This includes having in place clearly articulated standards (or their equivalents), presented in accessible formats, and ensuring that auditors and those to be audited are adequately prepared for their respective roles. In some international systems students become part of the review process. The use of peers (acting in a critical friend capacity) is also being practised. Suggestions are also made to have teaching staff 'deeply engaged' in the process by giving them a greater role in the

Responsive regulation is based on the belief that the natural inclination of the regulated community is to comply rather than not with standards and regulations.

preparation of the documentation required by auditors and especially in relation to addressing key audit criteria.

The move towards improving transparency is gaining traction across a range of industry sectors and education and training systems, including VET. Transparency is especially reliant on the generation and publication (often in online formats) of data on performance. The aim is to improve the provision of information to enable clients and consumers (including students and their parents, workers and employers) to make better choices in the purchase of services, and the action to take if the purchased services prove unsatisfactory. Ensuring transparency of information about the outcomes delivered also enables governments to make suitable funding decisions.

A variety of fees (including annual dues) are commonly applied for different services by regulators and accrediting bodies or agencies. Fees are charged for the lodgement of applications for initial, provisional and renewal of, or continuing, registration and the assessment of supporting documentation. These fees will vary according to the volume of qualifications, courses or units to be accredited or the locations of delivery sites. Charges are levied to cover the costs associated with the on-site visits of evaluators or auditors on external review teams or panels. Fees are levied on applications requesting the change of scope of registration or accreditation.

It is also clear that those systems that are revisiting their own regulatory frameworks need to consider the extent to which these require a major transformation and overhaul, or whether changes can be accommodated within the existing practices, keeping in mind that significant change can take some time to bed down. It is also important to note that implementing regulatory change involves considerable cost for both the system and the community, and that community fatigue with constant change can reduce trust in the abilities of regulators and in the effectiveness of implementation. These issues explain the staged approach to implementation that has been adopted in many sectors. Key to these decisions is good information about patterns and trends in regulatory behaviour to help to identify priority problems and issues. Understanding the root causes of problems (as promoted by many experts and commentators on regulatory frameworks) will be useful in directing the efficient use of resources.

Limitations

In this paper we have provided information on how some selected countries regulate or quality-assure their VET systems and qualifications. We have conducted a desk-top analysis of the information (including of the VET system in Australia) that is easily accessible through public websites and publications. Although it has been relatively straightforward to obtain some information on overseas developments via these means, we can also never be sure that the processes and policies posted on public websites are comprehensive, up to date or complete. Relying on descriptions of systems and processes from this distance means that our interpretations of what is intended or what actually occurs may well be compromised. Despite these limitations, we believe we have provided a range of potentially useful information.

As well as examining Australian materials that address VET and other education and training systems, we report on developments in those international systems that have implemented substantial regulatory reforms. We also draw from an extensive range of research materials

and from other relevant websites. This paper cannot, however, be considered to be exhaustive in its coverage. Nevertheless, it is sufficiently extensive to provide key insights and lessons to inform the discussion on effective and efficient regulatory frameworks for Australian VET.

✅ Quality-assuring Australian VET

What is quality? Why is it important? How do we ensure it? Responses to these questions have recently become far more important in the governance of VET institutions in both the public and private sectors. In this paper we discuss the key elements of contemporary regulatory systems, the aim being to enable a comparison with the Australian approach to the regulation of VET.

What is quality?

There are a number of different but not contradictory definitions used for quality. These generally refer to the degree to which outcomes are achieved against desired benchmarks rather than to an absolute value. The Health Foundation in the United Kingdom[1] views quality as a 'degree of excellence in health care'. A quality health care service is identified as being safe, effective, person-centred, timely, efficient and equitable. The Business Excellence Organisation makes a distinction between the quality concepts which focus on 'tangible products' and those which focus on intangible service delivery. Quality is also 'situational and time-based'.[2] The Business Dictionary defines quality in manufacturing as being 'free from defects, deficiencies, and significant variations'.[3] For our purposes we can define quality in VET as the level of excellence in training delivered by public and private training and assessment providers. It necessarily includes both quality management concepts as well as regulatory frameworks.

Why do we need quality?

In recent decades organisations have focused on quality and quality management as a business concept that can be used to guide and evaluate organisational effectiveness. Quality frameworks have become important to government agencies and enterprises (at local, jurisdictional and federal levels) as well as to private enterprise. Governments are eager to ensure that there is adequate accountability for the funding allocated to the provision of public services and products, while private enterprise is keen to make sure that products or services meet the needs of clients, return a profit and are delivered in accordance with government regulations.

In the education and training sector quality is important for securing client (employers and learners) and stakeholder (governments and industry) trust in the ability of the system to deliver relevant learning outcomes. This is especially critical as systems become more flexible in what and how training is delivered and accessed. With learners obtaining qualifications for the knowledge, skills and competencies they acquire in a range of formal,

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1. The Health Foundation, 'Inspiring improvement: what is quality', viewed 7 November 2014, <http://www.health.org.uk/about-us/what-is-quality/>.
2. The Business Excellence Organisation, 'What is quality?', viewed 7 November 2014, <http://www.bexcellence.org/What-Is-Quality.html>.
3. The Business Dictionary, 'Quality', viewed 7 November 2014, <http://www.businessdictionary.com/definition/quality.html>.

non-formal and informal situations, uncertainty can be created about the quality of the qualifications that are obtained. These various situations include school, the community, the workplace, institutions of vocational education and further and higher education, and other non-formal and informal places of learning, as well as online. Learners undertaking qualifications need to be sure that the qualifications in which they want to enrol have value in the labour market; employers, when making recruitment decisions, want to be sure that the qualification has been gained from a reputable institution; international systems want to be reassured that overseas qualifications are equivalent to their domestic qualifications; and governments want accountability for their funding decisions. Any uncertainty about quality can reduce trust and confidence in the value of the qualification and its acceptance by employers and the individuals themselves.

How do we ensure it?

Over the last two decades the need for education and training systems to develop systematic approaches to measuring the quality of systems and institutions has become widespread. In some countries traditional systems of inspection continue to be the mechanisms for ensuring that institutions deliver quality training. In others the application of quality standards (developed by government regulators and commercial quality and accreditation organisations) are used as criteria or benchmarks against which organisations are formally audited, to gain, maintain or renew registration or accreditation. Increasingly, governments are adopting outcomes-based quality assurance frameworks for making funding decisions.

Quality in VET

The effective and efficient regulation of training is central to the integrity of VET systems and to the qualifications they offer and deliver. Effective regulation ensures that the providers of training have appropriate and adequate processes and physical and human resources in place to deliver the required and relevant skills and knowledge; it also promotes continuous improvement practices and provides confidence for industry in relation to the skills graduates possess. An efficient and streamlined regulatory system and one not overly burdensome encourages compliance and quality of provision. Efficient regulation is also underpinned by a risk-based approach to quality assurance, which encourages the pursuit of excellence and self-compliance.

Strong regulatory frameworks can preserve the integrity of nationally recognised qualifications. Well-recognised and trusted qualifications can support labour market efficiency by providing 'effective signals' to the labour market about the knowledge and skills an individual has acquired, which helps employers and graduates to have confidence in the quality of the qualifications. The mission of the National VET Regulator (Australian Skills Quality Authority) is to provide effective regulation to ensure 'the full confidence of students, employers, industry, government and the community in the quality of training and assessment delivered by Australia's vocational education and training and English language providers' (ASQA mission statement[4]). The importance of good regulatory practice, including the reduction of regulatory burden, is also confirmed by the Victorian Registration and Qualifications Authority, responsible for regulating training provision under the

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[4] Australian Skills Quality Authority: <http://www.asqa.gov.au/about/agency-overview/functions,-vision-and-values.html>.

The regulation of the
Australian VET
system since the
early days of training
reform has seen a
range of revisions;
however, some
fundamental
principles have
endured.

Australian Quality Training Framework (AQTF) in Victoria (Victorian Registration and Qualifications Authority 2012).

Historical perspectives: Australia

The history of regulation and quality assurance in Australian VET since the early 1990s shows how some of the key and fundamental principles of these initial regulatory and quality frameworks have endured throughout subsequent iterations. It also shows that the system has alternated between being primarily a recognition system with certain prescriptions, to a system adopting an outcomes-based and continuous improvement approach, to one favouring compliance, with specific governance and financial standards. Currently tensions exist between those who favour a stricter compliance regime and those who are in favour of less bureaucracy and red tape.

The maintenance of a national approach has occupied the minds of federal government departments responsible for VET. However, the separation of state-based regulatory frameworks from Commonwealth regulation indicates a preliminary unease with the national system of regulation. At the time of writing (mid-May 2015) Victoria and Western Australia had not signed up to the new National VET Regulator standards, preferring to remain with the AQTF 2010 standards for registered training organisations (RTOs) and the 2007 AQTF standards for registering and course accrediting bodies. Since the National VET Regulator standards are based on the various iterations of the AQTF standards, it is important not to exaggerate any detrimental effects of having these two standards in operation. In addition, there is little preoccupation with national frameworks for quality assurance in other federated systems, for example, Canada and the United States.

The regulation of the Australian VET system since the early days of training reform has seen a range of revisions; however, some fundamental principles have endured. In 1992 the National Framework for the Recognition of Training (NFROT) was established to achieve national consistency in the training and assessment standards of a new national system. This was followed by the Australian Recognition Framework (ARF) in 1998 and the Australian Quality Training Framework in 2002. Various updates were made to the AQTF in 2005, 2007 and 2010. In 2005 changes clarified and modified the language and expectations of the framework (AQTF 2005 in Australian National Training Authority 2005a, 2005b). In 2007 a stronger focus was placed on quality skills outcomes, outcomes-based auditing, and continuous improvement (AQTF 2007 in Australian Government 2007a, 2007b). In 2010 changes strengthened requirements for initial and continuing registration to ensure consumer protection, governance by 'fit and proper persons', student record systems able to provide AVETMISS[5]-compliant data, and evidence of intended scope of operations and results of financial audits for new providers (AQTF 2010 in Australian Government 2010a, 2010b, 2010c). In 2011 the Australian Skills Quality Authority was created and a new framework, the VET Quality Framework (with similar standards in intent and effect to the AQTF) established. These standards are used to develop the legislative instruments for regulating registration. More recently the Minister for Education and Training introduced legislation to make the standards related to the regulation of private provision more

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[5] AVETMISS = Australian Vocational Education and Training Management Information Statistical Standard.

stringent. A new code of ethics practice governing the use of education agents was launched in early March 2015.[6]

Some enduring concepts

The overarching principle that has endured across the various iterations relates to the creation and maintenance of a national system of vocational education and training based on national industry competency standards. Other key principles that have endured through various iterations of the regulatory and quality assurance frameworks for VET relate to:

- registration of public and private providers to deliver accredited and nationally recognised training and issue nationally recognised qualifications and statements of attainment

- mutual recognition of nationally recognised qualification and training outcomes delivered by registered training organisations within and across states and territories, with decisions made by state and territory registering bodies

- recognition of prior learning (RPL)

- provision of a safe environment for training

- employment of appropriately qualified and competent staff

- protection of students' funds

- external review

- implementation of protocols for national branding for marketing and advertising purposes

- respect for access and equity provision.

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[6] <http://www.acpet.edu.au/members/codes-of-practice>.

Deciding on suitable quality frameworks, standards and indicators

The establishment of effective regulatory and quality assurance frameworks for VET systems is based on decisions made by policy-makers, regulators and accreditation agencies about what it is they want to achieve. From these they develop the standards, which are often known as quality standards, against which compliance will be judged. Quality is also judged using traditional systems of inspection, whereby 'inspectors' visit delivery sites and evaluate the extent to which providers are meeting expectations. These systems often have specific requirements for initial or continuing registration or accreditation.

The specific requirements are generally set out in quality standards, objectives or criteria. Standards-based systems, as well as those based on objectives and criteria, require that regulators have a clear idea of the intentions of the standards and objectives, and that they ensure that these are clearly communicated to and understood by those implementing them.

Some general concepts

The *Best practice regulation handbook* (Australian Office of Best Practice Regulation 2007) provides some useful guidelines for those wishing to develop the standards that will facilitate compliance as well as provide opportunities for continuous improvement. This handbook suggests that the first important task is to decide whether standards should be voluntary or regulatory. It notes that voluntary standards or guidelines are developed by non-government agencies, while regulatory standards are protected in legislation. Voluntary standards can sometimes be built into regulatory standards or are used as regulatory standards. In VET we see the use of both voluntary and regulatory standards, voluntary standards being used at the registered training organisation level to implement quality-based arrangements for their own administration and human resources management. Regulatory standards are prescribed by government agencies, including the National VET Regulator, or in Victoria and Western Australia by state-based regulators under the AQTF 2010 standards. Notably, the behaviour of regulators and those to be regulated is not only driven by specific industry standards but a raft of other regulating influences.

The handbook (Australian Office of Best Practice Regulation 2007) also notes that it is important for systems to decide whether standards will be based: on certain principles and written up in 'general terms' (principles-based standards); on performance outcomes (performance-based standards); or whether they will be more directive (prescriptive standards). Standards based on principles state the objectives it is hoped will be achieved but leave the organisation to put in place strategies to achieve these objectives. The effectiveness of such standards depends on the extent to which the organisation is committed to implementing strategies to achieve these objectives and has the wellbeing of its workers, clients and stakeholders at heart. An example of a standard based on principles in VET may be the standards related to mutual recognition, where the aim is to have registered training organisations recognise the decisions made by other registered training

organisations. Such a standard has not always been effective for the VET sector as training organisations have tended to place their own requirements on students, irrespective of whether or not the student has already achieved a certain competency.

Performance-based standards will describe the specific outcomes sought but will not require any specific actions to achieve these outcomes. The advantage of this approach is that organisations can adjust behaviours to suit their particular contexts. The ability to identify the level of performance considered acceptable provides a challenge for VET and can be decided by extensive consultation based on the experience of other systems.

Prescriptive standards spell out the technical specifications for achieving the objective. Although the advantages of prescription are that it establishes rules for sanctioning behaviour and is reinforced by legal action, there are some disadvantages. Prescriptive standards may not be sufficiently flexible to take into account changing circumstances and so become outdated or irrelevant; they could impede progress and innovation; and they may not be suited to complex services (like education and training). The cost of complying with prescriptive standards can be high. Similar caveats apply to the establishment of precise targets or standards. Precise targets and standards are easier to measure but they can also be inflexible if they cannot be adapted to local conditions. The handbook notes that whatever standards are adopted it is important that they are not 'overly complicated' (Australian Office of Best Practice Regulation 2007, p.112) or costly, and should only be used when they are the 'most effective and efficient way for achieving an objective'. In addition, the handbook advises that if standards are to be incorporated into regulation the regulation should not change the standard unless there is evidence that this is required to address the specific issue. It also suggests that when changes are made to a standard they should not be automatically incorporated into the regulation and that when the regulation refers to a standard it must identify the specific type, characteristic and date when the standard was created.

The need for aims, purposes and standards to be well articulated and definitive is commonly accepted among regulators, commentators and policy-makers. First, this provides easy-to-understand objectives for implementation purposes; and, second, it gives transparency to regulatory mechanisms. Both of these conditions facilitate the building of effective relationships between the regulated and regulator to help achieve compliant behaviour. Clear and specific standards also provide direction for well-structured and meaningful audits. The key is to ensure that they are articulated in language that is clear and easily understood, that is, they use plain English. Streamlining the way by which standards are crafted and presented can go some way to helping providers and regulators understand the intent of the standards and their responsibilities within them.

An example of a standard aiming not to be overly complicated is provided by the National Standards for Disability Services (Victorian Department of Human Services 2012).[7] There are six standards: Rights, Participation and Inclusion, Individual Outcomes, Feedback and

Clear and specific standards provide direction for well-structured and meaningful audits.

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[7] <https://www.dss.gov.au/our-responsibilities/disability-and-carers/standards-and-quality-assurance/national-standards-for-disability-services>.

Complaints, Services Access and Service Management. Associated with each of the standards are the elements describing the outcomes desired (Outcomes for People); the standard for service expected (Standard for Service); and indicators of performance (Indicators of Practice). The standards are written in plain English and use a combination of statements written in the first person and third person. The Outcomes for People statements are always written in the first person (for example, *I am safe and free from harm and my personal story is respected and kept private*). The standards are written in the third person in the Standard of Service statements (for example, *the service promotes individual rights to privacy, confidentiality, and freedom from abuse, harm, neglect and violence*) and in the Indicators of Practice statements (for example, *the service, its staff and volunteers treat individuals with dignity and respect*). An overview of the standards is presented in matrix format on one page to provide an overview. This section is followed by separate descriptions of each standard (including intent statements).

Similar issues concerning the need for standards to be easily understood and streamlined are highlighted by the *Investigation into the burden of regulation in NSW and improving regulatory efficiency: other industries* published by the New South Wales Independent Pricing and Regulatory Tribunal (2006). Here we learn that the need to respond to a number of different jurisdictional regulatory bodies not only increases regulatory burden but also adds to confusion. Furthermore, the need for services to comply with legislation applicable to other sectors in order to comply with standards in their own sector leads to a number of issues. First, there may be legal implications in cases where service providers do not understand or apply their responsibilities under both sets of legislation; and, secondly, the problem is further exacerbated if the language used is not straightforward or if documentation is excessive such that services fail to expend the time to acquaint themselves with requirements.

Having well-defined outcomes helps with consistency of interpretation for regulators and for those to be regulated. Consistent interpretation of the standards continues to be a significant challenge in the VET sector, and in other industries, both for those who need to implement the standards and the regulators that need to establish compliance.

An example of what can transpire when these (well-defined outcomes) are not in place is provided by the experiences of the regulator for civil aviation, the Civil Aviation Safety Authority (CASA). These experiences, published as case studies in the Australian National Audit Office's *Administering regulation: best practice guide* (2007) are informative. First, it is important to adopt a long-term or phased approach for total implementation. Second, it is important to obtain regular feedback along the way to inform future implementation. In 2005 CASA responded to the federal government's agenda for cost recovery by implementing a new full-cost-recovery arrangement to be managed over three phases. In CASA's case, feedback sought from industry after the implementation of Phase 1 revealed that the new arrangements were not fully understood and were not being uniformly applied. This was resulting in regulators charging different costs for a similar type of regulatory service. Industry was also found to be dissatisfied with the unreasonable or unjust level of the fees charged. The solutions were to communicate changes and increase consultations with industry, for Phase 2. As a result of feedback from Phase 1, CASA decided to implement activity-based costing and to define different cost profiles for different sectors (air transport, general aviation, personnel licensing, and manufacturing and certification). In addition, fee-recovery arrangements were initiated for non-operational support costs for activities dealing with regulatory and non-regulatory services (for example, some IT systems' depreciation and staff costs, financial administration costs, some insurance costs, and a proportion of the postage and freight costs).

The existing standards for registered training organisations in Australia do not take account of the diversity of providers.

The evaluation of New Zealand's External Evaluation and Review (EER) quality assurance framework (New Zealand Qualifications Authority 2012) revealed disquiet about perceived inconsistencies in the approaches and capability of evaluators, which in turn were perceived to have affected the reliability of the external review and the ratings applied. The evaluation panel was also of the view that there was a mismatch between what the New Zealand Qualifications Authority and the providers felt was the key pillar of the system. Where the Qualifications Authority focused on self-assessment and its developmental benefits, providers tended to concentrate on external evaluation and the rating system. There was also a view that the Qualifications Authority may have underestimated the time and effort involved in getting providers to adopt strong self-assessment practices. The findings of this evaluation are informative. Major change requires time and effort and its success is based on building the trust and confidence of providers; this includes trust in the ability and capability of auditors and verifiers. The adequate preparation of auditors for their roles in quality assurance is highlighted in the South African higher education study of the results of quality audits (South African Council on Higher Education, Quality Committee 2006).

The need to take account in regulatory frameworks of the sector's different providers is also being promoted. The existing standards for registered training organisations in Australia do not take account of the diversity of providers. There are suggestions for the creation of provider categories based on the existing categories (for example, TAFE [technical and further education] institutes, universities, schools, group training organisations, community-based providers, enterprise registered training organisations and other private and commercial providers). TAFE Directors Australia (2011) suggests that registered training organisations can be categorised according to whether they:

- offer a wide range and level of qualifications across multiple industry areas versus a limited number of qualifications in specific industry areas

- enrol large numbers of students, deliver large numbers of annual hours, and have a large number of campuses, or small numbers of each

- are established under government legislation and are publicly owned or are privately owned and commercial

- have VET as their core activity or do not have VET as their core activity

- are registered to deliver higher education or not registered to do so

- have international and/or offshore operations or domestic only operations.

At the same time it is also felt by some that there should be no special treatment for school-based registered training organisations and that they should be treated the same as any other registered training organisation, meaning that they should not come under the authority of any other agency (Smyth 2012).

The concept of user pays

The concept of user pays is also commonly applied to regulatory services internationally and at home. It is usual for government regulatory authorities and private accreditation bodies or agencies to apply a variety of fees (including annual dues) for the services they offer. Fees are charged for the lodgement of applications for initial, provisional and renewal of or continuing registration and the assessment of supporting documentation. These fees will vary according to the volume of qualifications, courses or units to be accredited, or locations of delivery sites. There are charges for the on-site visits conducted by evaluators or auditors on external review teams or panels (called 'visiting' teams in some systems). There are fees for applications requesting a change of scope of registration or accreditation. In some systems we also see charges applied to the issuing of warnings and other types of orders, generally applied to those who are found to be non-complying or defaulting.

Quality assurance and accreditation standards cover similar issues

In many jurisdictions the issues covered in quality assurance and accreditation standards converge.

New Zealand

The New Zealand tertiary sector covers tertiary education organisations, including private training establishments (PTEs), institutes of technology and polytechnics (ITPs), wānanga,[8] universities and workplace training. The New Zealand Qualifications Authority approves all qualifications and is the quality assurance body for all these institutions, with the exception of universities.[9] Private training establishments who want to become registered with the New Zealand Qualifications Authority[10] must demonstrate that they have in place policies and procedures for: institutional self-assessment under the external evaluation and review (EER) rules; decision-making; financial delegations; and financial controls. They must also have policies and procedures for: personnel recruitment and management; information management (including systems for the collection, recording and transfer of student data);

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[8]   Wānanga is a publicly owned tertiary institution that provides education in a Maori cultural context.
[9]   Public training providers have public reporting requirements and are deemed to be accredited.
[10] The New Zealand Qualifications Authority: <http://www.nzqa.govt.nz/>.

and financial, statistical and other information that the private training establishments must supply to, or keep available for, government agencies. In addition, policies and procedures are also required for: enrolment procedures; management of risks; student complaints, discipline and appeals; ensuring the policies and procedures are fair and equitable; and compliance with the Student Fee Protection Rules 2013.

Private training establishments that want to maintain their registration need to meet the following requirements: transparency, currency and accuracy of information provided to the public; and evidence of business management processes (including compliance with rules for submission of annual returns, sub-contracting to other organisations, financial reporting standards, financial controls, financial sustainability, and meeting the needs of stakeholders). They must also ensure that the information provided to students enables them to make relevant, timely and informed choices; this information refers to the results of institutional external evaluations; entry and selection criteria; institutional intentions to continue or otherwise with program provision; complaints and grievance procedures for the institution and the New Zealand Qualifications Authority; ready access to enrolment and academic information; and relevant regulations. The private training establishments must also protect student interests by ensuring their ready access to: complaints processes; fairness, equity and cultural appropriateness in dealing with complaints, discipline, and appeals processes and procedures; educational and non-educational support and guidance to meet student needs; and currency and quality of educational resources and equipment.

Private training establishments must ensure that their teaching staff are competent, up to date and appropriately experienced and qualified to teach in their areas. Management and administrative staff need to be competent. The organisation chart needs to be current. Private training establishments must have in place a quality management system that is up to date and systematically implemented. Effective assessment and moderation processes need to be implemented across all accredited education and training programs. The institution must participate in self-assessment and external evaluation and review quality assurance mechanisms. It must also address EER requirements and plan for and implement the improvement actions that have been recommended as a result.

A review of industry training in New Zealand highlighted the need for simplicity and clarity in quality assurance standards, as well as simplicity and clarity in the different roles expected of industry and other training organisations.

Selected European Union member states

In 2009 the European Quality Assurance Framework for Vocational Education and Training (EQAVET) was adopted by the European Union Parliament and Council. The framework was intended to provide states with a reference framework to help them to monitor and implement quality assurance processes for continuous improvement. The main aim was to use such frameworks to increase the transparency and consistency of VET policy development and to promote mutual trust, student and labour mobility and lifelong learning. In 2010 the Bruges Communiqué announced that 'transparency and a common approach to quality assurance are necessary to build up mutual trust which will facilitate mobility and recognition of skills and competences between those systems' (European Commission 2010, p.3). However, the EQAVET principles have not been applied to evaluate the quality of qualification design, assessment and certification. More than 20 countries had

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implemented quality assurance reforms by 2013 and had in place quality standards for providers (European Commission 2014).

Although not specifically set out as formal standards, the criteria used by the Further Education and Training Awards Council (FETAC) for judging the effectiveness of colleges in Ireland can also identify some areas for possible coverage of standards[11] (CEDEFOP 2008). These include: communications with staff, learners and other stakeholders; equality planning and delivery; staff recruitment, induction and development; program design, delivery and review; assessment arrangements (including security, internal coordination and consistency with national standards, feedback to learners and appeals); access, transfer and progression, including entry, equality, and arrangements for recognition of prior learning; protection for learners in the event of a program ceasing; and self-evaluation and review, including learner involvement and external evaluation. Keeping in mind that some of these areas have also been considered in the formulation of current regulatory standards in Australia, these criteria could be used to identify the types of issues that might be covered in any review of quality assurance standards for registered training organisations in Australia.

In Sweden the Swedish Agency for Advanced Vocational Education uses an up-front standards-based approach to approve and accredit courses and provide funding for students and providers of continuing training. Before being approved for accreditation, providers must undertake an internal self-assessment process and provide the agency with evidence of program content,[12] governance structures and processes (including recruitment strategies) for addressing gender equity issues and the needs of disadvantaged groups. After 12 months the agency conducts an inspection of the provider, in which it takes into account the findings of the self-assessment, feedback from students and reports from the education board. Any complaints that have been received by the agency about the provider are also considered. Once a student's course has been completed, a follow-up survey is undertaken of students' destinations, their satisfaction with the course and the usefulness of the skills acquired during the course. This information is taken into account in making funding decisions about whether the course will continue (CEDEFOP 2009).

VET providers who want to access public funds for offering continuing training in Germany must be certified by an accredited certification agency (CEDEFOP 2009). To be certified they need to prove their financial status and capacity to provide training. They must show they can meet the requirements for integrating students into employment and for staff qualifications, professional experience and engagement in further training. They must also have in place an efficient system for quality assurance and quality development. This includes customer focus, continuous evaluation of training courses using indicators, and measures and processes for continuous improvement. They must also provide evidence of cooperation with external experts in improving their quality systems. Providers have to show they have taken account of the existing skills, knowledge and experience of target groups.

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[11] The function of FETAC is to agree with providers the approaches they will take to quality-assure their programs, validate programs, recognise awards, and monitor and review the effectiveness of implementation (CEDEFOP 2008). Although providers are responsible for establishing the arrangements for quality assurance they need to meet specific FETAC criteria. FETAC has been superseded by Quality and Qualifications Ireland (QQI).

[12] The main approach to continuing training is for employers and training providers to collaborate in the development of program content so that it is customised to local conditions and requirements.

United Kingdom

The United Kingdom is moving towards reducing the number of standards and making them less prescriptive and complicated; it is also anxious to address concerns among further education colleges about the need to adapt standards to local conditions. There is increasingly a view that when too much effort goes into respecting the standards then the other important tasks of training providers may receive less attention; namely, their teaching and learning effort and their responsibilities for meeting community needs will suffer (CEDEFOP 2008; Collinson 2009). The importance of simplicity in standards and streamlined rather than complex compliance regimes are supported by principals of further education colleges (Collinson 2009), mainly because the standards are felt to be important for self-regulation purposes. These principals noted that, although they were in favour of self-regulation (supported by external regulation and other measures for accountability), they were wary of increased complexity and increased regulation. They suggested the creation of a set of baseline standards to be negotiated with the sector and a small set of key performance indicators for judging effective performance.

Keeping the proliferation and complexity of standards and the cost of compliance in check is important for the regulators and regulated. These findings are highlighted by the New South Wales Independent Pricing and Regulatory Tribunal in their investigation into regulatory burden (2006). This report provides examples of the frustrations experienced by some sectors of the childcare industry in trying to comply with the standards when they are difficult to understand. It also reports on the difficulties providers experience when attempting to remain compliant with both the standards of their specific industry, as well as the standards of associated industries. This can lead to inconsistencies and inaccurate applications. The existence of national regulations on top of state and territory legislation and regulations applying to other industry sectors that must be addressed by childcare organisations increases the complexity of requirements and demand. This was found to reduce an enterprise's ability and motivation for compliant behaviour.

United States of America

The United States of America does not have a national system of accreditation, although it takes accreditation into account when deciding on provider access to federal funding. In the US independent accreditation agencies are responsible for developing a set of accreditation standards for providers. The accreditation standards of the Council of Occupational Education (COE) and the Accrediting Commission of Career Schools and Colleges (ACCSC) provide accreditation for career-related programs (similar to Australian VET programs).

The Council for Occupational Education is a nationally recognised accrediting agency for post-secondary non-degree-granting and applied associate degree-granting institutions delivering occupational education, which also covers career and technical education. The key areas covered in its standards are: institutional mission; educational programs (admissions/recruiting, programs, instruction); program and institutional outcomes, strategic planning, learning resources (media services, instructional equipment, instructional supplies); physical resources; financial resources; human resources (general issues, faculty, administrative and supervisory personnel, instructional support staff, non-instructional support staff/services), organisational structure; student services and activities; and distance education (regulatory requirements, mission, programs, program

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outcomes, learning resources, technical and physical resources, financial resources, human resources, student services, student identity and privacy).

The Accrediting Commission of Career Schools and Colleges is the accrediting body for private degree-granting and non-degree-granting post-secondary institutions offering career-related programs. Each standard in the ACCSC framework is preceded by a statement of purpose and is followed by detailed elements of the standard. The standards and the items they cover (reported in more detail in appendix A) comprise: management and administrative operations program requirements; educational administration and faculty qualifications; student recruitment, advertising and disclosures; admissions, policies and practices; student services; student learning, assessment, progress and achievement; additional criteria for separate facilities (for example, campuses); and arrangements for distance education.

Ontario, Canada: Public Colleges of applied Arts and Technology

These public VET post-secondary colleges and their boards are responsible for the quality assurance of their programs. Currently they are applying the Program Quality Assurance Process Audits (PQAPA)[13] standards to guide their processes for quality assurance and continuous improvement. These standards are also used in external audits, which are conducted on a regular basis and 'cyclically' every five years. These audits identify whether or not QA processes align with the criteria that have been defined for 'exemplary performance'; they also identify recommendations for improvement or for enhanced compliance with the criteria. A report of these results is posted on public websites. Prior to the audit, colleges will prepare a self-study report. The Ontario College Quality Assurance Service (OCQAS) is an independent agency established to provide colleges with the tools to help them to meet the quality standards required. In September 2015 the colleges will be required to move from the system of Program Quality Assurance Process Audits to one of accreditation. The Ontario College Quality Assurance Service will become an accrediting body. The standards for accreditation reflect the standards of the PQAPA and provide a framework for assessing the extent to which colleges' quality assurance processes are meeting the required standards. There are six broad accreditation standards with a set of specific associated requirements.[14] The standards deal with: quality management system (six associated requirements); existence and communication of policies and practices (seven associated requirements); program design (eight associated requirements); program delivery and assessment (five associated requirements); conformity with government requirements (four associated requirements); and availability and allocation of college-wide resources (four associated requirements).

It is the associated requirement details which spell out the full requirements for each broad standard and these must also be met. Colleges need to provide a good evidence base to justify their claims for the quality of their programs and student learning. If a college is judged as meeting all requirements for all six standards, then it will be awarded full accreditation; meeting four or five standards will attract a status of conditional accreditation. If a college is judged as meeting fewer than three of the standards and their requirements, it will receive a non-accreditation result. Colleges with full accreditation will

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[13]   <http://www.ocqas.org/en/wp-content/uploads/2013/10/Orientation-Manual1.pdf>.
[14]   <http://www.ocqas.org/en/?p=5014>.

be reviewed after five years; those with conditional accreditation will need to provide an 18-month follow-up report. This report will be used to determine whether the college will move from conditional to full accreditation status. Those with non-accreditation status will need to address specific plans of action to improve their status. Re-evaluation will take place between 18 months and 36 months. Private career colleges in Ontario (similar to our private providers) must be registered by law and have their programs approved by the Superintendent of Private Career Colleges. If they offer post-secondary courses without this approval they are in violation of the law.

Australia

The VET Quality Framework in Australia comprises the standards for training organisations registered by the National VET Regulator. It aims to achieve national consistency in the way in which providers are registered and monitored and quality standards applied and enforced. The framework addresses issues of probity (including, the fit and proper person requirements and the financial viability risk assessment requirements); the data provision requirements; and the Australian Qualifications Framework. If providers want to be registered with the National VET Regulator they will need to identify how: they are or will be responsive to industry needs; they will address quality assurance issues; they will ensure that information they hold is secure and accurate; and the information about the services they provide is accessible. They will be expected to implement mechanisms to ensure that learners are informed and protected; that their complaints handling is fair; and that they have in place effective governance and administrative arrangements and address legal compliance issues. As noted, Victoria and Western Australia continue to address the standards of the 2010 Australian Quality Training Framework and the 2007 standards for registering and accrediting bodies.

It is also informative to note the quality standards of other sectors. The quality standards recently developed by the children's education and care[15] sector cover the educational program and practice, children's health and safety, physical environment, staffing arrangements, relationships with children, collaborative partnerships with families and communities, and leadership and service management. Associated with each of these quality areas are standards and elements. Instruments and guidelines for the implementation of an assessment and rating system to judge performance of the different services against the standard have also been developed. It is still too early to tell whether or not the framework and the standards have resulted in better processes or outcomes, but a communiqué released on 7 December 2012 by the Standing Council on School Education and Early Childhood (2012) indicates some positive results about the rating system used. It reports on an evaluation conducted by the Australian Council for Educational Research of 491 assessments and ratings of services which confirmed the validity and reliability of the rating process.

Outcomes-based quality indicators

The focus on outcomes as an indicator of quality is increasingly common in systems overseas. European countries are moving towards outcomes-based standards for systems to

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[15] <http://files.acecqa.gov.au/files/National-Quality-Framework-Resources-Kit/NQF03-Guide-to-NQS-130902.pdf>.

assure the quality of their VET systems and away from a system that merely defines and monitors input, resources, procedures and processes (CEDEFOP 2008). However, such traditional approaches seem to continue in some countries.

Selected European Union member states

VET systems in Italy, France, the United Kingdom, Germany, Ireland, Denmark and the Netherlands have begun to adopt targets and outcome standards as important elements of quality assurance. Stated outcomes can be used to manage VET systems and act as crucial criteria for assuring the quality of the system. At the national level, targets play an important role in driving and monitoring the progress of the system. Keeping standards to a minimum, making sure that they identify clear and easy-to-measure outcomes, and articulating their nature and intent to stakeholders and particip ants are also favoured.

Examples of quality assurance indicators for VET in European Union member states are given by CEDEFOP (2009, p.12). They include: relevance of quality assurance systems for VET providers; investment in training of teachers and trainers; participation rate in VET programs; completion rate in VET programs; utilisation of skills in the workplace; unemployment rate; prevalence of vulnerable groups (at-risk groups); mechanisms to identify training needs in the labour market; and schemes to promote better access to VET.

Countries such as Italy, France and Germany make use of externally set curriculum and examinations. Such an approach improves the comparability of learning outcomes at the national, regional or industry sector levels. In contrast, the Australian approach has placed much more focus on the quality assurance of systems and processes, although the focus of AQTF 2010 introduces some outcomes-based measures.

In England the Office for Standards in Education, Children's Services and Skills (Ofsted; 2012) uses the Common Inspection Framework[16] to look at the experience of individual students to judge the effectiveness and efficiency of the college under review. The college being reviewed will be given a rating based on the results of the inspection. These ratings will inform the frequency and timing of future audits. A handbook for auditors or inspectors sets out the key processes to be followed in conducting audits. The body which evaluates and monitors the compliance of awarding bodies in England is Ofqual (Office of the Qualifications and Examinations Regulator). It, too, uses a risk-based program to carry out its auditing activities.

A review of further education in the United Kingdom conducted by Collinson (2009) indicated that principals of further education colleges were in favour of an outcomes-based approach for evaluating colleges. They believed that when colleges were shown to have met or exceeded the standards they could be left to run their own affairs. When they were found to be non-compliant, they would be offered peer support and in severe cases be subject to professional intervention.

New Zealand

Outcomes-based quality assurance approaches are also adopted in New Zealand by the New Zealand Qualifications Authority. The New Zealand Qualifications Authority uses a system of

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[16] <https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/393485/ Handbook_for_the_inspection_of_further_education_and_skills.pdf>.

up-front accreditation of providers, courses and qualifications, and self-assessment combined with external evaluation and review of training providers (New Zealand Qualifications Authority 2009a). The authority defines the evaluation questions and key focus areas used to guide the evaluation.

The New Zealand external evaluation and review system

The EER is conducted periodically to provide the New Zealand Qualifications Authority with 'a statement of confidence (judgment) about an organisation's educational performance and capability in self-assessment' (New Zealand Qualifications Authority 2009b*)*. Educational performance is about whether the educational outcomes achieved by the organisation provide value for learners and other stakeholders (in terms of quality of learning and teaching and the achievement of learners). Capability in self-assessment is about the extent to which the organisation uses self-assessment information to 'understand' its performance and implement improvements; that is, the extent to which it manages its responsibilities for accountability and improvement. The New Zealand Qualifications Authority also provides feedback and guidance to teachers on internal assessment and makes the information about the quality and relevance of a provider's educational performance and organisational capability public. Ratings given as a result of the evaluation are awarded across the six evaluation areas and key focus areas. These EER ratings are also published. An evaluation of this framework, to be discussed later in the report, reveals that there is some concern about the consistency of these ratings and judgments across auditors.

Lessons learnt

The Best practice regulation handbook (Australian Office of Best Practice 2010) tells us that standards should be able to provide adequate guidance to enable organisations to implement their own internal processes for quality assurance and self-improvement. However, they should also be backed up by external regulation and accountability. The challenge is to achieve a balance between accountability and performance evaluation requirements and the need for internal processes for quality enhancement and self-improvement. Nevertheless, using a risk-based approach (increasingly used in Australia and overseas) to assure the quality of provision through external quality audits is a good example of the effective and efficient use of resources.

In developing regulatory frameworks and standards, it is also important to understand that highly prescriptive standards can inhibit compliant behaviour as well as effective continuous improvement and innovation activities. When standards are too flexible, they may risk the quality of provision and the reputation of systems. Where they are too prescriptive, it may distract the attention of educators away from their primary functions of teaching and learning.

Clear, consistent and easy-to-understand standards provide guidance for implementation purposes and they help to impart transparency to regulatory mechanisms. They help to facilitate the building of effective relationships between the regulated and regulator, which assists in achieving compliant behaviour. Clear and specific standards also provide direction

for well-structured and meaningful audits. Having in place standards that are easily understood and navigated are keys to improving compliance.

Outcomes-based standards (including the setting of targets for performance) help to provide some objective metrics for evaluating performance. These outcomes-based approaches used in VET systems overseas have some clear lessons for VET in Australia. Any outcomes-based approach is highly dependent on the relevance of the outcomes to providers, students and governments. Second, the approach is highly dependent on having adequate, accessible and reliable data for making judgments about performance. Third, the achievement of these targets will be affected by different social and economic conditions. Fourth, it is important not to set short timelines for the achievement of targets, especially if they are likely to require a few years to achieve their best effect. There is also the risk that quality may be ignored if targets place the emphasis too strongly on specific goals, for example, raising participation or lowering drop-out rates at the expense of quality learning.

It would be a mistake to believe that a drive for simplicity in standards means a loss of specificity in what is expected. For example, the Ontario Accreditation Quality Standards (2014) comprise six major overarching standards. Here each of the standards is broken down into six or seven requirements. These specific requirements in themselves also act as desired standards: each of the requirements, as well as the overarching standard to which they are aligned, must be met if providers want to achieve full accreditation. This is an example of rationalising the number of key standards, but keeping the specific details in 'standard requirements'. It teaches us that a change in the form does not always mean a reduction in regulatory or compliance activities.

👍 Sensible and effective regulation

In this section we discuss some principles behind what we have called sensible and effective regulation. This is an approach to regulation that is based on concepts of responsive regulation and the removal of regulatory burden, where it makes sense to do it. Reducing regulatory burden is not only concerned with removing red tape for the regulated but also with removing the administrative burden for regulators.

The aim of *responsive* regulation is to focus the system on the achievement of good training and learning outcomes rather than on compliance with prescriptive regulations. Responsive regulation also includes a more developmental approach, with the introduction of self-assessment for some elements, while requiring external assessment for others. Recent de-registrations of providers flag the possibility of strengthening the requirements for the initial registration of providers and for introducing standards which not only recognise compliance but also reward higher levels of practice.

Responsive regulation

Valerie Braithwaite's report, *Compliance with migration law* (Braithwaite 2010), and the unpublished report 'Regulating for learning in the tertiary education system' (Braithwaite 2012) are especially useful for identifying the principles of the psychology of regulatory and compliant behaviour and for the practical suggestions they make for regulating behaviour in specific sectors, including taxation. Braithwaite examines various approaches to regulation (including self-regulation, risk-based regulation and responsive regulation) and makes suggestions for how systems can increase compliance with regulations. In her view praise and reward can be more effective than coercion, for 'to rely on coercion is more costly in time, money, reputation' (Braithwaite 2012, p.24). She also believes that if regulators want to be effective they need to establish integrity. This can only be done through dialogue and the building of trust with regulated communities. Responsive regulation is also discussed in the paper by (John) Braithwaite, Healy and Dwan (2005). This paper provides support for the premise that regulators are more likely to be successful if they take into account the context, conduct and culture of the community they are trying to regulate.

Valerie Braithwaite generally favours a light touch over a heavy hand to begin, with a stronger interventionist approach applied progressively to more serious transgressions. Her regulatory pyramids for enforcement and support outline the increasingly more severe actions that await non-complying organisations and the more rewarding actions that await complying organisations. Freiburg's paper *Re-stocking the regulatory tool-kit* (2010) discusses Valerie Braithwaite's regulatory pyramids for enforcement and is of the view that on their own they do not 'capture the complexity of regulation', as they operate when enforcement is not needed because of other influences on behaviour including: standards, codes, ethics, guidelines, agreements covenants and disclosure. These he considers as being independent of enforcement. He also warns that there may be situations when the regulator fails to enforce regulation either through lack of motivation or resources or having too close a relationship with those who are to be regulated. It is interesting to note that the

Responsive regulation requires multiple interventions to enable regulators to customise sanctions in appropriate and proportional ways to the transgression.

Australian National VET Regulator has made use of the regulatory pyramid concept to set out its own approach to progressively graduating regulatory responses. [17]

Responsive regulation requires multiple interventions to enable regulators to customise sanctions in appropriate and proportional ways to the transgression. Freiburg (2010) does not believe that all enforcement needs to follow a pyramidal pathway, meaning that it does not have to start at the bottom. Some transgressions require 'serious and immediate sanctions and should not depend on any future actions by the offender'. This approach would especially make sense for VET providers in respect to criminal offences such as fraudulent use of government funds and student fees.

Freiberg (2010) has developed his own taxonomy of regulation, recognising that his key tools (including economic regulation, transactional regulation, structural regulation, informational regulation, physical or structural regulation and legal regulation) are not independent of each other in their influence on behaviour. For the purposes of this project Freiburg's work serves to both confirm the existence of many of these regulatory mechanisms in the current VET regulatory space as well as provide additional ideas for how different forms of regulatory practice can be used to influence or change behaviour to achieve compliance with desired outcomes.

Roche (2006) provides an in-depth account of how the Australian Taxation Office has adopted a 'dual-track' approach to responsive regulation. The first track acknowledges that taxation is necessarily based on voluntary compliance and that this compliance can be increased if the Taxation Office adopts a spirit of cooperation rather than coercion with taxpayers. The second track adopts a progressively more punitive approach with those taxpayers who fail to pay their taxes. However, Roche insists that coercive enforcement should only be used when the less coercive type of enforcement fails. Roche provides evidence from the 2003—04 annual review to show that the combination of these soft and firm approaches are working, with increases in tax collected by comparison with years gone by. Roche also reminds us that responsive regulation is not a static form of regulation and that regulations which have been varied to the circumstances of different segments of the regulated community need to be reviewed to ensure that they remain relevant and fair. Above all, the procedural requirements of regulation should be respected. That is, 'everyone, regardless of whether they are perceived to be honest or dishonest, is entitled to be treated fairly'. The *Best practice regulation handbook* (Australian Office of Best Practice regulation) also highlights the need for fairness and equity; for example, if overseas manufacturers of a certain product need to label products in a certain way then this should also be expected of domestic manufacturers.

Responsive regulation is also about capturing the voices of stakeholders like practitioners and students. Shoesmith and Walker (2011) support the role of practitioners in the development of performance measures. The United Kingdom's Quality Assurance Agency for Higher Education (2011) provides some examples of how the principle of giving students a voice is applied in the different student engagement practices of a range of higher education providers in Scotland. These included questionnaire surveys on student experiences and student engagement in institutional evaluation processes; strategic governance levels; and faculty and subject level management committees. The agency also

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[17] ASQA Compliance Pyramid, viewed March 2014,
<http://www.asqa.gov.au/verve/_resources/Compliance_pyramid.pd>.

gives examples of teachers and students working together to develop a set of principles and values for the support of teaching and learning. In some institutions students who participated in these leadership or governance activities had their involvement documented on their academic transcripts. Such activities can be captured in standards, a practice which reflects the need to give both students and practitioners a voice in teaching and learning.

Reducing regulatory burden

Concerns have been raised about the need to reduce or streamline the standards in an effort to reduce unnecessary regulation and regulatory burden.

Adopting risk-based approaches to quality and regulation

The adoption of the risk-based approaches to quality and to regulatory practice commonly applied in domestic and overseas quality assurance systems and regulatory frameworks is a practical solution to reducing regulatory burden. The streamlining of standards may be another. The first is dependent on having sufficient information for identifying high and low risk; the second for having a clear and exhaustive picture of all of the other standards and regulatory requirements that might apply. It is also important to understand whether condensing standards in the pursuit of 'streamlining' will introduce more rather than less complexity.

Risk-based approaches to regulation and to quality management and assurance are especially promoted by those who champion responsive regulation. A risk-based approach is considered to make sense because it leads to an efficient use of the resources of both the regulator and those to be regulated and concentrates these resources where they are most needed. Although Valerie Braithwaite is a firm believer in the use of risk-based approaches to increase efficiency of regulator resources, she also believes that regulators should not neglect providers who pose a relatively low risk and do the right thing by the regulator. Newsletters, formal appreciation for good work and best practice, random audits, benchmarking exercises and dob-in lines are suggested as possible approaches to maintaining the presence of the regulator in the minds of providers. Presumably dob-in lines include mechanisms for proving the veracity of information provided.

An approach to responsive regulation based on controlling risk is provided by Malcolm Sparrow (2000), who believes that if regulators and administrators in government or businesses want to control risk they need to be able to develop and apply skills in problem-solving. This includes the need to look at root causes of problems and use these to identify possible courses of action. According to Sparrow, the skill lies in being able to identify emerging issues or harms, study their patterns and trends, and then apply appropriate and problem-specific interventions. The key is to be constantly vigilant and subsequently apply 'swift' responses so that the problem does not escalate and become too difficult to handle. It is important also to be able to articulate and justify that a problem actually exists. In Australia the Better Regulation Office in New South Wales has based its guide, *Risk-based compliance* (New South Wales, Better Regulation Office 2008), in part on the work of Malcolm Sparrow. The approach promoted is one which looks at patterns and trends in compliance and then targets action and resources to those areas where they are most needed and will attract the greatest benefit. The guide is especially useful because it sets out a step-by-step approach to assessing risk. These deal with identifying and analysing the risks of non-compliance, prioritising the risks,

The adoption of the risk-based approaches to quality and to regulatory practice is a practical solution to reducing regulatory burden.

The skill lies in being able to identify emerging issues or harms, study their patterns and trends, and then apply appropriate and problem-specific interventions.

identifying and selecting the compliance measures, planning for implementation, and reporting on and reviewing the implementation.

The Division of Career and Adult Education of the Florida Department of Education (2012) in the United States has also adopted a risk-based approach to monitoring the compliance of public providers of career and technical education (VET) and adult education with state and federal funding requirements. Here the quality assurance team identifies some key risk factors and assigns a risk rating to each provider, based on a number of predetermined risk factors. The results of these ratings are used to identify an appropriate monitoring strategy. The risk factors used to identify targeted providers in this system comprise:

- volume of funding (higher funding means higher risk)

- number of programs administered (higher numbers mean risk)

- complex grants (for example, consortium grants mean higher risk)

- number of grants with more that 10 per cent of funds spent (more such grants indicate higher risk)

- prior audit results (history of negative findings signal greater risk)

- prior audit results (history of repeated and uncorrected actions signal greater risk).

The type of risk-based quality assurance mechanisms that are also proposed for the United Kingdom's publicly funded sector in higher and further education (Higher Education Funding Council for England 2012) are based on decreasing regulation for high-performing institutions and increasing investigations for those considered to be of higher risk. Examples are also provided on the type of data that would trigger 'out-of-cycle' investigations by the Quality Assurance Agency.

The assessment of risk and the application of sanctions for poor performance and rewards (autonomy to run their own affairs), based on an assessment of previous behaviour and performance, are also favoured by principals involved in the evaluation study of further education colleges in the United Kingdom (Collinson 2009). Serious transgressions require more serious action by regulators. Such examples have direct relevance for VET for they combine concepts of self-regulation backed up by collaboration with critical friends with external accountability in cases of poor performance.

The embedding of minimum requirements (compliance with employment-related regulations and industry codes of practice) into government procurement contracts is another example of how regulatory burden can be reduced (Howe & Landau 2009). Such contracts can be used to regulate other activities such as labour standards. As well as helping to reduce the burden of regulation, these regulatory mechanisms can also assist in decision-making on who can or cannot gain government contracts. The case study reported concerns the Victorian Government Schools Contract Cleaning Program. It provides a good example of responsive regulation, which involves consultations with a broad range of stakeholders in the development and management of the program. In the VET sector government procurement rules have also been used to award contracts to organisations that satisfy predetermined criteria, mainly relating to the employment of apprentices. It is important to ensure that the benefits of restricting tenders in this way outweigh the costs.

If we want to increase compliance through the application of standards we must also ensure that the standards themselves are easy to comply with, not too excessive and not too costly. These factors can add to regulatory burden, which can then result in non-compliance. Examples of such burdens are demonstrated in the Children's education and care sector in New South Wales and given in the review conducted by Independent Pricing and Regulation Tribunal (2006). For example, this sector must also respond to the regulatory requirements of both Commonwealth and jurisdictional governments, as well as to the legislative instruments of other industry sectors, including, for example, building regulations, security clearances, and health and hygiene requirements. The impact of the federal system of governance for many sectors (including VET) continues to be a significant concern and can only be addressed by effectively harmonising the various regulatory requirements.

The advantages and disadvantages of a light-handed approach to regulation are discussed by Cowan (2012), who claims that it saves on the costs of more prescriptive regulation. He also makes the point that the threat of regulation may achieve what a regulator might want to achieve, without actual regulating for it.

Lessons learnt

Sensible regulation is concerned with being responsive to the needs of the regulated as well as to the needs of the regulator. Being responsive is about listening to the voices of those to be regulated as well as those of stakeholders and clients. It is also about ensuring that standards are not so numerous or prescriptive as to make regulatory compliance and enforcement difficult for those to be regulated and enforcement complex for the regulator.

Adopting a 'dual track' approach to regulation (where the focus is on voluntary compliance supported by progressively more punitive actions for transgressions)[18] might also be more strongly emulated in the VET sector. The need for equitable and fair application of regulatory standards and their enforcement across providers is critical to building good relationships and trust and ensuring a clear direction for practice. Braithwaite's notion of a light-touch approach to regulation may have some downsides if safeguards are not immediately available. The downside to this form of regulation is that the regulated parties cannot always be relied upon to play by the rules to achieve efficient outcomes. This is especially the case when it concerns safeguards of students' payments for courses, integrity of qualifications, and rights to fairness and equity.

Simplicity and clarity across a range of VET system products and services have often been viewed as a way to improve the quality of the system. In practice this may not be as straightforward as imagined and may in fact introduce other non-anticipated complexities. Firstly, the streamlining of the standard at the broad level may require far more detailed guidelines and explanations and cross-referencing at another level. This may prove to be more trouble and more complicated than if the standards appeared as separate elements. There is also the risk that, in the quest for rationalisation, the standards lose the prominence they once had as stand-alone requirements. These are all issues that need to be considered. Increasing the amount of documentation needed to understand the requirements of a particular standard may actually increase rather than reduce the burden of regulation.

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[18] Advocated by Roche (2006).

A risk-based approach requires the regulator to have sufficient information to be able to identify those who are and who are not a risk to the system.

A risk-based approach to regulation is another key component of adopting a sensible approach. A risk-based approach, however, requires the regulator to have sufficient information to be able to identify those who are and who are not a risk to the system. This requires having in place effective intelligence mechanisms as well as a system for dealing with performance that requires improvement and performance that re quires the application of sanctions. The responsive regulation approach, which involves a light touch, followed up by more aggressive sanctions with the escalation of non-compliance, is a useful way of doing things. The option of removing accreditation or registration from poor performers or for serious transgressors must always be available to regulators. The important issue is having in place transparent rules and regulations and which providers find easy to understand and to follow and appropriate responses to get them back on track when they falter.

A significant role and voice for industry

Across education and training sectors at home and abroad, especially tertiary sectors, the need for engaging with industry is clear. The voice of industry is heard formally in its involvement in the development of qualifications, assessment for qualifications, and provision of practical work experience. For example, in some countries (such as Australia, the United Kingdom and New Zealand) industry is represented by formal industry sector organisations with responsibility for influencing the skills that are developed for their sectors. In others, the industry voice is heard via formal representation on government or institutional curriculum committees, college boards, skills assessments, and ad hoc provision of practical experience and advice. Legal contracts of training (as in apprenticeships and traineeships) provide a very specific form of industry engagement for the system as a whole and for the individuals concerned.

New Zealand

In New Zealand the formal voice of industry is heard via industry training organisations (ITOs; which also include industry training advisory groups). These organisations are accepted by the New Zealand Qualifications Authority as being experts in a particular sector or field, making them well placed to develop standards for the national qualifications (from level 1 to 8) of the New Zealand Qualifications Framework. Established under the Industry Training Act of 1992, ITOs have been set up by particular industries to:

- develop national skill standards for their particular industry

- provide information and advice to trainees and their employers

- arrange for the delivery of on- and off-job training (including developing training packages for employers)

- arrange for the assessment of trainees

- arrange the monitoring of quality training.

These organisations are recognised by the New Zealand Qualifications Authority as nationally representative of experts in a particular field, for the purposes of establishing standards for national qualifications. There were 12 industry training organisations in 2014 covering a range of industry sectors (see appendix B, table B2).

The New Zealand Ministry of Education (2012) has also developed proposals for changing policies about industry training and established a system that gives industry a formal role in quality assurance.

United Kingdom

In the United Kingdom a formal voice for industry is provided by sector skills councils (SSCs) and sector skills bodies (SSBs). These organisations are independent organisations responsible for the workforce and skills development in their industry sectors. They are not just

responsible for the trades and other vocational occupations but also for the professions, administrative and other ancillary staff. The Federation for Industry Sector Standards (<http://fisss.org/sector-skills-council-body/>) describes these organisations in the following way 'Sector Skills Councils are independent, employer-led UK wide organisations. They aim to develop high-quality skills standards with employers which support productivity and profitability growth and enhance competitiveness in UK and overseas markets'. There are 18 sector skills councils and five sector skills bodies (see table B3 in appendix B) responsible for working with employers to develop apprenticeships and the occupational standards that underpin new training and qualifications. The Department of Employment and Learning[19] notes that sector skills councils are to work with employers and partners to agree priorities and targets to:

- decrease skills gaps and shortages

- raise productivity, business and public service performance

- increase opportunities to boost the skills and productivity of everyone in the sector's workforce, including action on equal opportunities

- improve learning supply, including apprenticeships, higher education and national occupational standards.

This means that employers have a voice in training, not only in apprenticeship training, but also in undergraduate and postgraduate education. Employers can then use the framework to choose the content of the qualification that best suits individual apprentices. In addition, sector skills councils and sector skills bodies provide advice to employers about the qualifications that are best suited for the apprenticeship program chosen. They can also provide employers with a list of the training providers that can deliver these. They are also responsible for verifying evidence to ensure that valid apprenticeship certificates are awarded.

Ontario: Canada

Involving industry in closing skill gaps has recently been introduced by the Ministry for Training, Colleges and Universities, in Ontario. The Sector Initiatives Fund (SIF) has been set up to enable representatives of trade and professional associations, employer groups and unions (representing specific sectors of the Ontario economy) to access funding which will help them to develop training programs, standards and materials for their workforces.[20]

Broad industry involvement in making decisions about significant government initiatives that affect industry is essential. In his description of the establishment of the College of Trades in Ontario, Whitaker (2009) provides an example of how collaboration between stakeholders (including industry) has led to innovative solutions to help increase the trades and provincial economies in Canada.

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[19] Department of Employment and Learning (<http://www.delni.gov.uk/index/successthroughskills/skills-and-training-sectoral-development/sectoral-development-skills-for-business-network.htm>, viewed November 2014).

[20] The Ministry of Training, Colleges and Universities: Ontario Sector Initiatives Fund: <http://syllepsis.ca/eng/eopg/publications/sif_2012-13_guide.pdf>.

The College of the Trades: listening to the voice of industry

The establishment of the College of the Trades is an example of close collaboration between government, employers, tradespeople and training providers. The aim was to establish a self-governing institution to promote skilled trades and to modernise the apprenticeship system. The College of the Trades would take the major responsibility for regulating the trades. As well as helping to ensure that the skilled trades sector was able to meet the needs of industry and the economy, the College of the Trades was an attempt to create a 'professional college' for the trades in a bid to achieve parity between the trades and the professions, including teachers, nurses, and doctors. The College of the Trades was to be organised into four divisions: Construction, Services and Industrial and Motive Power.

Although the College of the Trades would be self-governing, a role for government in the establishment of policy would continue. Its establishment was mainly based on dissatisfaction with current systems, which had led to trades categories not reflecting the diversity of local provincial conditions or the composition of the Ontario labour market. The system was felt not to address the under-representation of equity or minority groups in the trades, and did not make entry to the trades easy for overseas-trained skilled workers. More importantly, there was frustration with the processes for determining which trades should become restricted and the appropriate ratios of journeymen to apprentices.

The establishment of the college was preceded by broad consultations with industry, which was felt to be essential before the implementation of such a significant government initiative. Today the College of the Trades[21] is responsible for developing the Apprenticeship Training Standard in partnership with the Ministry of Training Colleges and Universities and representatives from the trade concerned. This standard is about ensuring consistency and accountability in on-the-job training delivery, such that all apprentices acquire the required skills to be successful in their trades. It is also responsible for developing the Curriculum Standards in partnership the Ministry of Training Colleges and Universities and in consultation with representatives from the trade and Training Delivery Agent instructors. The standard has been designed to support consistency and accountability within the in-school training process, ensuring apprentices across Ontario develop the skills necessary for success in his/her trade.

Involving industry in closing skill gaps has recently been introduced by the Ministry for Training, Colleges and Universities, in Ontario.

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[21] Ontario College of the Trades, 'Training Standards', viewed November 2014, <http://www.collegeoftrades.ca/training-standards>.

Germany

Another example of formal and strong involvement for industry in VET is provided by the German dual system for vocational education and training, where industry, government and unions (called the social partners) collaborate to provide quality training and assessment. [22]

The German dual system

Industry works collaboratively with the federal government to develop vocational training regulations and to specify trainee occupations and the period of training. Industry also works with state governments to develop curriculum that describes the skills and knowledge to be developed as a result of the training. The Federal Institute for Vocational Education and Training (BIBB) performs an advisory role. The 'chambers' cover German occupations under the categories of industry and trades, craft trades, public service, liberal professions, domestic service, agriculture, and maritime and shipping. The role of the chambers is to provide advice to companies, to register trainees, to certify the technical aptitude of trainers and to hold examinations. When apprentices have completed their training, they will undertake examinations set by these chambers or other 'competent bodies'. Such activities enable industry to have a powerful influence on curriculum. The chambers also monitor the performance of companies providing training within their districts or regions and review their ability to provide or continue to provide training. In addition, there are employee works councils, which may also participate in the planning and conduct of vocational training and in hiring trainers. Where training companies cannot provide all the necessary training, special training workshops give trainees access to these skills. Where companies are unable to establish workshops for this purpose (especially small companies), training workshops are set up by the chambers and professional associations. Small companies can also collaborate to provide joint apprenticeships.

Australia

In the Australian VET system industry has traditionally been closely involved in apprenticeship and traineeship models of training, where there is a formal contract of training signed by employers and apprentices or trainees. With the creation of the national VET system in the 1990s industry was given specific leadership responsibilities for VET. At the national level this was most clearly seen in the development of national industry skills councils (ISCs) with responsibilities for the development of national industry training packages (which comprised units of competency, qualifications and assessment guidelines) for the particular industry sectors allocated to them (see appendix B). [23] At the state and territory levels, industry input by state and territory training advisory bodies and industry training councils (where they continue to exist) provide advice at the local level. Registered training organisations also have their own arrangements for linking with local enterprises and industry and using these to further develop their training programs.

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[22] Vocational Training in Germany: the dual system, viewed November 2014, <http://www.hk24.de/en/training/348086/duale_system.html>.

[23] Training packages are documents which identify units of competency, qualifications and assessment requirements for an industry sector. Since their inception responsibility for their development has been given to industry skills councils.

A new model based on the development of partnerships between government, industry and training providers has been proposed in Victoria (Victorian Department of Education and Early Childhood Development 2012). This model is described in *Victoria's new industry participation model: consultation, quality and information sharing.* A key feature is to give industry more opportunities to voice its level of satisfaction with training products and services. Another strategy is to reduce the duplication of effort by using a range of existing employer and industry mechanisms valued by employers. The industry training advisory boards are to remain but without government funding. It is too early to tell whether or not these partnerships will give industry a direct influence on regulatory frameworks in VET, but it is clear that there will be ample opportunities for employers to be consulted. The challenge, however, continues to be the accurate identification of bodies and associations that are *valued* by employers, the willingness and capacity of employers to provide useful advice to government, and the resources to maintain and grow these partnerships.

The various ways by which TAFE institutes in Victoria, Queensland, South Australia and New South Wales maintain active formal and informal industry engagement strategies are reported by Misko and Halliday-Wynes (2009). Across these TAFEs (which included both large metropolitan and smaller country TAFEs with multiple campuses, and those in dual sectors) the need to maintain good relationships with employers and other industry stakeholders at both the faculty and organisational level was taken seriously. They adopted formal and specific industry engagement models as well as approaches based on informal contacts and membership of professional, industry and community associations. The aim was to ensure that the college was seen as relevant and responsive to community and industry needs, to harness industry support for providing advice on the relevance of assessment and training, and to make their premises available for student work placements.

With the ascension of the Abbott government to power in late 2013 current arrangements for providing a voice for industry were to be altered. New departments, first the Department of Industry, and then the Department of Employment and Training, took responsibility for VET. Many government agencies operating outside relevant federal departments were taken back into the department. The National Skills Standard Council (NSSC) was dissolved and a new council, the Industry and Skills Council, formed. The work of the Australian Workplace Productivity Agency, with responsibilities for the National Workforce Development Fund, was returned to the department and the agency dissolved.

In late 2014 a review of the responsibilities of current industry skills councils, especially in the development of training packages, was begun. In 2014 the federal government released two discussion papers for consultation with stakeholders. One introduced the government's intention to open up the development of training packages to the market. The rationale for changing existing approaches and introducing a contestable model was predicated on the value of further opening up opportunities for representatives of industry (for example, employers with grass roots knowledge of the skills required) to have their say in the development of relevant qualifications. A summary of the results from this consultation process has yet to become available.

At the same time the second discussion paper asked for feedback on the adequacy of training packages and accredited courses. At the time of writing a final summary report of these face-to-face consultations was not yet publically available. However, preliminary reports of separate jurisdictional face-to-face-consultation sessions related to this review

With the creation of the national VET system in the 1990s industry was given specific leadership responsibilities for VET.

are available on the VET Reform Taskforce website.[24] These highlight a range of issues that have preoccupied the sector for some time. They include questions about 'who is industry?' and issues relating to motivating industry to become more involved in education and training, especially small businesses. The difficulties of engaging effectively with industry to identify training needs are exacerbated by the competing (and sometimes frequently changing) needs of employers in the same sector. The continued dominance of large business in VET advisory and regulatory forums means that the needs of small and medium-sized businesses are often overlooked. Perceived industry needs for job-ready graduates were balanced with recommendations for employers to increase their roles in the provision of on-the-job training and induction, and in mentoring learners in 'how to work'. At the same time it was acknowledged that the training system was not always capitalising on the wealth of experience available in the business sector. A summary report of the submission process for this review highlighted support for the current system of training packages, noting it was the implementation rather than the design that were key issues for quality and industry responsiveness.

In May 2015 the government announced the creation of a new body, the Australian Industry and Skills Committee (AISC), to provide the industry voice in VET policy-making. The committee (comprising current CEOs of major enterprises and industry peak bodies) would replace 'the complex framework of 13 different committees and advisory bodies', to help ensure 'it is efficient and effective in delivering the job-ready workers that industry needs' (Birmingham, media release, 8 May 2015[25]).

The new arrangements[26] (to be implemented by January 2016) also included the appointment by the Australian Industry and Skills Committee of industry reference committees (IRCs). These bodies need to be able to show that they could speak for substantial proportions of the industry 'sub-sector' they represented. IRCs were to be supported by skills service organisations (SSOs), who would compete for this role in an 'open market'. Skills service organisations would be expected to have a comprehensive understanding of the Australian VET system and the process of training product development. Although SSOs may wish to focus on the development of training products for specific industry sectors, they were not required to do so.

The Australian Industry and Skills Committee would advise the government on VET quality standards (including provider standards and training package standards), endorse qualifications, provide industry direction for VET research, and provide input into the national Industry and Skills Council. It would also make assessments on the need for training product review, apportion work to skills support organisations, review requirements for new support materials for training products, and appoint new, or reappoint, industry reference committees.

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24 <http://www.vetreform.industry.gov.au/publication/summary-national-consultations>.

25 <http://www.senatorbirmingham.com.au/Media-Centre/Media-Releases/ID/2681/New-Industry-and-Skills-Committee-to-Strengthen-VET>.

26 <https://education.gov.au/news/new-arrangements-training-product-development-australian-industry>.

Engaging industry in training and assessment: tools and templates

A range of tools to help registered training organisations conduct training needs analyses and enterprise skills audits, develop training assessment strategies, contextualise units of competency and identify language, literacy and numeracy needs in training specifications was developed for the National Quality Council in 2009. The *Industry/enterprise and RTO partnerships* (National Quality Council 2009b) paper recommends that industry/enterprises and registered training organisations develop and maintain solid and productive partnerships so that industry/enterprises have confidence in registered training organisation products and services. The paper also documents examples of tools designed to help enterprises to select a suitable registered training organisation, and training organisations and enterprises to develop mentoring skills, use authentic workplace tasks for training and assessment, and develop negotiation skills to establish and maintain the registered training organisation—enterprise relationship.

Feedback received from training organisation and industry participants on the trialling of these tools indicated that they found them to be generally useful. However, there were requests to simplify them and provide more clarity on their usage for others (for example, training needs analysis tools). Some tools (for example, the 'selecting an RTO' tool) were also appropriate in their current form for large organisations but required simplification for small businesses. Tools like the 'contextualising of units of competency' were considered to be insufficient and required the development of another tool to understand the current state of the enterprise. There were also different points of view among training organisations and enterprises on the need for tools for developing assessment strategies and authentic workplace tasks, with enterprises believing these would give them an opportunity to provide input and training organisations finding them to be unnecessary or not always useful. The study also found that many training organisations were unsure of how to best meet the requirement for them to have closer links with industry and enterprises. They suggested that workshops be provided to help training organisations to understand their regulatory obligations. The provision of tools, templates, or workshop activities to help training organisations, employers and other industry stakeholders to develop effective training and assessment partnerships is useful. The regular participation of employers and industry stakeholders in such partnerships is not guaranteed, and it is often the registered training organisation that is the driver of these partnerships.

Lessons learnt

Formal structures for involving industry in VET are common at home and overseas. These structures involve industry stakeholders (for example, representatives from employer, union, or peak body groups) in separate industry-sector advisory and/or regulatory structures or through formal representation on government bodies.

Strong collaboration with industry stakeholders at national or local jurisdictional levels enables government policy-makers to keep abreast of existing and emerging trends. The other key benefit is that governments have ready access to bodies possessing a comprehensive knowledge base of the industry-specific skills and competencies required for the relevant industry sectors. This in-depth knowledge base is a critical foundation for the

development of entry-level qualifications and training provision, as well as for continuing education and upskilling.

At the training provider level, institutions with close linkages to employers and other industry stakeholders are able to more effectively implement strategies for the external validation of assessment strategies as well as for assessments and provide direction for training provision. The development of a strong knowledge base, however, is dependent on the amount, type and accuracy of information that such bodies have at their disposal, or can readily access. Where such bodies lack the resources to conduct accurate scans of their economic environments, then the knowledge they are able to muster will be compromised. This applies to both providers operating in a contestable market and those operating in the public arena.

The principle of broad consultation with industry before implementation is also useful to keep in mind when introducing and implementing new governance and regulatory structures. Such requirements could well be reflected in quality assurance or regulatory standards. It is also important to identify anticipated problems and to speculate on unanticipated consequences before embarking on the change.

In developing standards for industry engagement we must note the many ways that can be and are used to enable industry to have a voice both at the general level and directly in local assessment and training. It is also important to note that practitioners who do not have strong networks with employers may find it difficult to engage employers in validating assessment tools and processes.

The dominance of large business in VET forums may mean that the needs of small- and medium-sized enterprises are overlooked, denying them a meaningful voice in the identification of industry needs. For this reason funding mechanisms should be designed to enable industry engagement bodies or their equivalents to conduct accurate and comprehensive scans of the needs of the industries they serve. In addition, it is also important that training needs are identified by individuals who have direct and operational experience of the skills and knowledge required now and for the future. Motivating these operational players to be involved in discussions about sector skill needs will be the challenge. However, it is the key way by which we may better understand current and emerging needs to aid in the development of a truly responsive VET system.

Improving the quality of teaching and assessment

The quality of training and assessment in the VET sector in Australia has been a recurring preoccupation of policy-makers, educators and industry stakeholders. This was recently confirmed by the Council of Australian Governments when it identified the need 'to improve the confidence of employers and students in the quality of training courses' (Council of Australian Governments 2012). Having a robust set of quality assurance regulations and measures to ensure quality training and assessment provision, coupled with active engagement with industry, is a key aspect of a quality VET system.

Improving the quality of teaching

Improving the quality of the VET teaching workforce has been a key concern for educators and academics. In Australia, Wheelahan and Moodie (2011) have written a suite of papers which deal with issues of initial teacher training and continuing professional development.[27] Key among these are aligning qualifications to teaching and training roles, establishing a system of master practitioners and master teachers, introducing the new category of cross-sectoral teacher (mainly to work across schools, universities and VET), and requiring all teachers and trainers to acquire educational qualifications that will lead to higher-level qualifications. Other suggestions include the setting-up of a staff data collection, schemes for the mentoring of new teachers and for maintaining industry currency, a VET scholarship centre for the study of pedagogy and a VET teachers association. This association would recognise entry-level and advanced teaching qualifications and register teachers according to predetermined categories. There is nothing revolutionary in these suggestions, but the well-structured and ordered framework for implementation provides some good direction for future action.

The need to ensure that vocational education teachers have the appropriate skills and knowledge for their specific teaching roles has also been promoted in a report by the United Kingdom's Skills Commission (2010). This report describes the results of an inquiry into teacher training in vocational education, which found that teacher quality was important to the success of students. This issue is especially germane in view of the growth of vocational education as a pathway for 14 to 19-year-olds. The report recommends the development of convergence courses (between general education and vocational education) to allow those with Qualified Teacher Status (QTS) to acquire Qualified Teacher Learning and Skills status (QTLS) and head teachers and college principals to acquire School and College Leader status. It recommends increased flexibility in initial teacher training courses to meet the needs of different categories of teacher, especially work-based teachers. Suggestions are made for teacher recruitment campaigns to be promoted to part-time lecturers and professionals (under the Teach Too, Teach Next, and Teach Later Schemes).

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[27] The researchers provide a review of the literature, establish some options for action, and then set out their recommendations for a quality framework for teaching in VET and its implementation.

The importance of establishing threshold learning outcomes, as well as teaching and learning standards, is noted by Krause et al. (2012). Their paper affirms the value of expert peer review at discipline level, external and professional (including international) accreditation systems, and the publication of performance data. The authors caution against a blind acceptance of performance data that are not meaningful and they emphasise the commonly accepted maxim that outcomes and reporting are only as good as the available quantitative and qualitative data and the associated interpretations. They also emphasise the need to build on the existing provider course accreditation standards, share information on institutional examples, and develop sample learning standards statements across the sector. These are good lessons for implementing regulatory changes that will help to improve the quality of training and assessment in VET.

Improving the quality of assessment

Debates about the quality of assessment in the VET sector are increasingly gaining momentum in Australia and overseas. These debates are generally concerned with the lack of adequate mechanisms to ensure the consistency, comparability and quality of assessments between registered training organisations or training providers, assessors and industry sectors. The aim is to implement mechanisms that ensure the quality and consistency of assessments, principally by implementing methods for their validation and moderation.

Some of the criticism of assessments in Australia has also been directed at the qualification that has become the entry-level educational qualification for those who want to teach or offer training in the sector — the Certificate IV in Workplace Training and Assessment. Critics of the qualification not only question its ability to adequately prepare teachers and trainers with the appropriate pedagogy but also highlight its inadequate focus on assessment theory and practice at the certificate IV level. Clayton (2009) has noted the need to increase the confidence of the sector and its stakeholders in the quality of the assessment. However, she also believes that confidence in assessment is also reliant on quality candidates and quality trainers. In her opinion a quality trainer is one who has comprehensive knowledge of assessment practice. She is also of the view that trainers who have undertaken only this certificate IV qualification cannot be expected to possess this level of knowledge because it is not given in-depth treatment in the training package relevant to this qualification. Clayton believes that the 'one size fits all' qualification does not help trainers to adapt and contextualise training to meet the varied needs of the students. This they must do on their own. Standards which require teachers and trainers to undertake higher training and assessment qualifications (say, at the diploma level, also suggested by Clayton) may be one solution; another would be to incorporate requirements in the standards for the continuing professional development of teachers. These arrangements are being practised in the professions, including law and teaching, where practitioners are expected to undertake a certain amount of professional development activities to maintain their registrations.

Halliday-Wynes and Misko (2013) in their small-scale study of assessment in the VET sector identify some key risks to the quality of assessment reported by childcare and aged care practitioners. These include: trainers and assessors not having the depth of understanding of assessment theory and practice; compromising rigour for quick completions in short-duration courses (where they exist); inadequate student access to well-supervised work

placements; lack of screening for occupational suitability of students undertaking these qualifications; poor literacy and numeracy skills of students; lack of rigour in recognition of prior learning assessments; lack of clarity of employer or industry role in assessments; and the lack of widespread systematic processes for moderation and validation of assessments, either within or between providers. In many cases these issues require a range of separate solutions (not all of which are in the control of individual students or the registered training organisations who enrol them in courses or place them with enterprises for work placements). Nevertheless, lack of knowledge about the theory or techniques of assessment as well as validation and moderation practices could be in part addressed by requiring the inclusion of more assessment modules in the Certificate IV in Training and Assessment Training Package and requiring training systems and/or registered training organisations to offer practitioners regular professional development activities about assessment, including RPL. Lack of rigour in assessments, especially for the Certificate IV in Workplace Training and Assessment, might also be addressed by implementing more stringent registration processes for registered training organisations wanting to have this qualification on scope.

A larger follow-up study of the assessment knowledge and practice of training and assessment practitioners conducted by Misko et al. (2014) sheds some more light on the skills and knowledge of trainers and assessors in aged care, business and electrical VET programs. Their study finds that trainers (who were often also the assessors) were well aware of the requirements for quality assessments; that is, they could verbally cite the different factors which made up a quality assessment. They spoke of the need to refer to the performance criteria in training packages when formulating assessment questions and judging performance. They noted the critical significance of validating assessment tools with peers to ensure that they were clear and easy to understand. They also identified the need for consistency across assessors assessing similar courses. The key challenges they experienced in developing and conducting assessments were more concerned with the lack of time to put all this conceptual knowledge into practice rather than with not knowing what was required. Concepts of validation, however, were often confused with concepts of moderation and at times they were used interchangeably. In some industries the lack of employer interest or time to participate in validation exercises or to be more closely involved in assessing students was also identified as an issue. The moderation of results of assessments was rarely practised. The focus was on making sure that there was little need for moderation because assessment instruments had been validated with peers (also with employers where possible) to ensure currency, relevance and clarity.

A number of National Quality Council (NQC) publications dealing with improving the quality of assessments have identified a range of interventions that can be implemented. The report *Investigation into industry expectations of vocational education and training assessment: final report* (National Quality Council 2008) provides information on what are considered to be the key elements of an ideal system of assessment. These include the prioritisation of critical units in training packages, the training and ongoing professional development of assessors, validation and moderation, and the establishment of formal relationships between registered training organisations and enterprises to address the needs of existing workers participating in education and training.

Australian researchers from the Work-based Education Research Centre of Victoria University, in conjunction with Bateman and Giles Pty Ltd, have come up with a code of professional practice for moderation and validation (National Quality Council 2009a), which provides

guidance on how best to go about conducting moderation and validation exercises. Some high-level principles for validation and moderation have been crafted around six elements. These principles are concerned with ensuring that the processes are: transparent, representative, confidential, educative, equitable, and tolerable.[28] Another publication, by Gillis (2010), is also devoted to the process of moderation and validation in a range of settings.

The quality of e-learning is another issue for the training system, especially as there has been a dramatic increase of online training provision across various industry sectors. For example, the 2009 national E-learning Benchmarking Survey (Australian Flexible Learning Framework & J Management Services 2009) notes that 62 per cent of teachers and 46 per cent of registered training organisations across Australia are using online assessment activities. Callan and Clayton (2010) found from AQTF auditor respondents that the quality of online assessments suffered from: authenticity, poorly designed online quizzes, lack of independent validation from subject matter experts, and inadequate use of multiple sources of evidence. Poor-quality tools, authenticity of evidence in e-portfolios, and consistency among auditors were also identified as risks. They suggest that quality could be improved by having well-trained and informed trainers, 'worked' examples of online assessments, and guidelines for practitioners. Barker (2007) has developed a set of standards that should apply to e-learning.

An investigation into the various workplace assessment models being used in New Zealand and internationally (Vaughan 2010) also notes inadequacy in assessor training and the unit of study used to accredit assessors. It looks at the practical implementation of moderation and verification procedures and provides some suggestions for action. These include the need to reduce the pool of assessors, provide ongoing professional development to maintain competency levels and develop career pathways for assessors. These issues are not dissimilar to issues in Australian VET. The New Zealand approach could also be used to inform the development of standards for the training and accreditation of assessors.

The extent to which the 'transparency' of assessment of tasks produces worthwhile outcomes for students in the United Kingdom has also been raised as a concern in a study commissioned by the Learning and Skills Development Agency in 2005 (Torrance et al. 2005). In this study researchers question the worth of providing students with very explicit information and guidance in assessment tasks. They are of the opinion that, although students know exactly what is expected of them, the explicitness of the task removes the challenge for learners and reduces the quality and worth (to learners) of the outcomes achieved. 'The clearer the task of how to achieve a grade or award becomes, and the more detailed the assistance given by teachers, trainers and supervisors, the more likely are candidates to succeed … balancing the explicitness of learning objectives and instructional processes against the validity and worthwhileness of learning outcomes' (Torrance et al. 2005, p.46). This is considered a key challenge for the system. This thinking seems to strike at the heart of a competency-based system, which is based on clear and explicit description of what must be demonstrated to denote competent performance. This may be so, but in theory the need for students to show also that they can deal with a range of variables (a

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28 More specifically, the code encourages transparency of purposes and processes, representativeness of the samples used to validate or moderate assessment tools and judgments, confidentiality of individual learners, assessors and providers, the educative role of validation and moderation processes, including its integration into the assessment process, the provision of constructive feedback and tolerance for specified margins of error.

fundamental tenet of competency-based training in the Australian system) should ideally help to challenge the candidate in assessment tasks. The extent to which this occurs in practice is questionable.

Dealing with the poor performance of registered training organisations

The NQC report (National Quality Council 2009a) states that the ideal assessment system would also see the auditing system given responsibility for appropriate sanctions, including removing poor performing registered training organisations from the marketplace. This report does not expand on how this could be done, but one possible solution would be for auditors to implement processes which would see underperforming training organisations being placed on a performance management strategy much like that used with employees who do not meet accepted performance standards. An approach on loosely similar lines is described in the final draft report of *Feasibility study of the development of a panel of experts in assessment to work with RTOs found not to be compliant with AQTF 1.5: final report'* (National Quality Council 2011). This study focuses on the Certificate IV in Workplace Training and Assessment and presents a number of models for ensuring that registered training organisations comply with the standards for adequate assessments via external validation by panels of experts. The identified risks to such an approach include the lack of sufficient experts to form suitable panels, the risk of registered training organisations only presenting a biased sample of learner and assessment tools for validation, the high costs for registered training organisations in remote regions, and low consistency between assessors.

In the United Kingdom leaving the performance management of seriously underperforming registered training organisations to the regulator has been adopted in relation to further education colleges (Collinson 2009) and in New Zealand (New Zealand Qualifications Authority 2011) to non-university providers.

In 2014 Ofqual, the regulator for vocational education in the United Kingdom, announced that it was reassessing its regulations to ensure that the system awarded quality qualifications. It also noted its intention to remove organisations that did not comply. It stated:

> We are strengthening the way we regulate to help improve the quality of qualifications. We will change the rules so that they promote good qualifications that we can all trust and value, and make it much harder for awarding organisations to get away with poor quality … Where awarding organisations already offer good, valued qualifications, we will not force them to change for the sake of it. We also intend to make sure that all of the organisations we regulate take responsibility and properly focus on the quality of the qualifications; where they fail to do so we will take firm action. We will meet each of the awarding organisations to set out the detail of our plans and provide more guidance to enable them, where necessary, to improve the qualifications they offer. We expect the organisations we regulate to consider carefully whether all the qualifications they offer are truly valid and reliable. Where they do not have this confidence they should consider whether the qualification should continue to be offered or how the shortcomings can be addressed to improve the quality.

We also intend to make sure that all of the organisations we regulate take responsibility and properly focus on the quality of the qualifications; where they fail to do so we will take firm action.

Lessons learnt

Effective training and assessment practices are the key components of a well-functioning VET system. They underpin the quality and integrity of knowledge and skills acquisition, the qualifications issued by awarding bodies or providers and the reputations of institutions. Key to their development is having in place comprehensive programs for the preparation and induction of trainers and assessors as well as requirements for continuing professional education. The establishment of trainer and assessor norms and behaviours that support the external validation of assessment tools, strategies, and practices and the moderation of results are also keys to effective provision and should be promoted.

The knowledge and practice of trainers and assessors is only one part of the solution to quality training provision, others including the quality assurance processes that are implemented both internally at the provider level and externally by regulators.

The need for accountability and transparency

When we discuss the concept of transparency we are not only interested in the clarity of purposes and meanings of regulatory standards, functions and actions. We are also interested in the provision of information to enable students and their parents and employers to make better choices of places to undertake or purchase training and for governments to make suitable funding decisions. Transparency is especially reliant on the generation of data about performance. Accountability is about the responsibility that organisations have for their actions and is generally related to their outlay of public and private funds to achieve certain predetermined outcomes.

The need for transparency in regulation and in other quality assurance mechanisms is commonly accepted across a range of regulatory systems. This is highlighted in the report by Bateman, Keating and Vickers (2009) on the quality assurance frameworks of six Organisation for Economic Co-operation and Development (OECD) countries. They note that this is achieved by making the results from the audit and quality assurance processes publicly available. For example, in Ontario the executive summaries of each audit report (including ratings of performance against predetermined criteria) are published on the Ontario College Quality Assurance Service (OCQAS) website.

A suite of transparency initiatives has been canvassed and/or adopted in the Australian VET sector to improve the information available to the sector, students, businesses and industries, and governments. The assumption is that better information will enable more informed decision-making. Initiatives like the Total VET Activity (TVA) project promoted by the Council of Australian Governments (Department of Industry, Innovation, Science, Research and Tertiary Education 2012) aims to improve the coverage of the National VET Provider Collection to incorporate all registered training organisations offering accredited training, for the purposes of monitoring, reporting and research. Another initiative which is dependent on implementation of TVA is the Unique Student Identifier (USI). As well as providing an individual with a history of his or her achievement in VET, the USI initiative can help governments in their administration of entitlements to government-subsidised training. The My Skills website is another government transparency initiative aiming to provide information on the performance of providers and the training options available in the sector.

United States of America

Efforts to improve the transparency of information and the accountability of institutions have also been undertaken by the American Association of Community Colleges (AAAC; 2012). This is reported as the first national system of accountability for community colleges (most like VET providers) developed for and by community college leaders for measuring the effectiveness of community colleges. Associated with the Voluntary Framework of Accountability (VFA) is the VFA Metrics Manual (American Association of Community Colleges 2011, 2015). This manual (which can be navigated online) contains the metrics or measures that can be used in evaluations of the extent to which colleges are meeting their objectives and the needs of students. Associated with the VFA is the National Institute for Learning

Outcomes Assessment's (NILOA) Transparency Framework (NILOA; 2012), a website which is configured to help institutions to develop and publish evidence on student outcomes.

The Voluntary System of Accountability (VSA) is the four-year universities' response to improving transparency and accountability. Part of this system is the College Portrait, a web-based reporting tool providing students and their parents with information about different colleges to enable them to make an informed choice. It can also be used by high school and community college counsellors to provide further education advice to students, and governments to access college performance data for making educational policy.

The College Portrait presents data and other information on student and staff characteristics (including student learning gains), admission requirements, class sizes, safety issues, subject majors, cost of attendance and financial aid. It also provides tools to enable users to calculate the estimated cost of attending a specific college. Users can also access information about student learning experiences and outcomes. It provides spaces for institutions to include stories about assessment activities. The VSA, as its name indicates, is a voluntary system and has so far involved 321 universities. Nevertheless, one-third (171) of eligible institutions still do not participate.

The College Portrait Student Learning Outcomes Pilot was implemented to help colleges to acquire experience in obtaining and reporting on the learning gains of their students, with students assessed during their first year and in their senior year (generally fourth year of university). Institutions are given four years to post the results. These 'learning outcome gains' are based on students' results in one of three approved standardised tests, which are perceived to measure 'value-added growth' (including, problem-solving, critical thinking, reasoning and communication skills).[29]

An evaluation of this pilot (Jankowski et al. 2012) found that the majority of participating institutions had yet to post their results and the College Portrait learning outcomes page to attract very few users, presumably because the information provided was found to be not easily understood or relevant. The most visited pages were those that dealt with costs (including the college cost estimator). Small percentages of users visited the pages dealing with student learning outcomes or experiences. Twenty per cent of participating institutions recorded no visitors to their student learning outcomes page between 2009 and 2011. The evaluation found concerns among participating institutions relating to the reliability, validity, and interpretation of results from the standardised tests. The cost of test implementation and the different processes used by colleges to select those students who would participate in the test and the low motivation of students to do well in the tests were also raised as concerns. The evaluation concluded that, although there was broad acceptance of the VSA and the College Portrait, there was room for improvement, especially in regard to a better tailoring of the information to the needs of different stakeholders and audiences. The use of a common building structure for the College Portrait was also suggested. Institutions recommended the introduction of a range of student learning measures to describe student attainment.

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[29] The three tests were the Collegiate Assessment of Academic Proficiency, Collegiate Learning Assessment (used by 86% of colleges posting results on the College Portrait), and the ETS Proficiency Profile.

New Zealand

Publishing results on websites may have unintended consequences for quality assurance agencies and may divert provider attention from what regulators intended. For example, an evaluation of the New Zealand Qualifications Authority's Evaluation and Review System, discussed earlier in the report, found a mismatch between New Zealand Qualifications Authority and provider understanding of the intent of the processes. Where the Qualifications Authority was focused on the developmental nature of self-assessment as the key feature of its quality assurance process, the providers being evaluated were more focused on the external evaluation review and the ratings they produced. This indicates that transparency is not always concerned with the clarity and sharing of performance data but also about ensuring that providers have a clear understanding of the role of policies in the first place.

United Kingdom

League tables are another mechanism for publicising the performance of private and public institutions for public accountability purposes. Gunn and Hill (2008) provide a brief overview of the history and operation of league tables and their application in the United Kingdom across different public sectors (hospital, schools, and local authorities). The paper is particularly useful for identifying the key input, output and process measures that are combined to give an institution a league table ranking.[30] The study finds that the higher the league position of the provider, the faster the increase in application rates, at least in the early period of implementation. The analysis showed that when league tables were first introduced the impact of rankings in league tables on applications was high but that it subsequently declined. The analysis also showed that older (pre-1992) universities were initially more successful than newer (post-1992) universities, and newer universities were closing the gap quickly, even though their rankings experienced little change. Such an analysis was based on a single ranking. When sub-sets of divisions were used, a different effect was revealed — a growth in applications, regardless of rankings. The authors speculate that students themselves have 'views' about the institutions that will accept their applications and those that will not and place applications accordingly. These lessons are also important for the VET sector, especially if governments intend to make decisions about funding for providers and programs based on published ratings of provider outcomes.

Australia

Although there is broad support for more comprehensive reporting under the Total VET Activity program, project consultations with stakeholders have identified a number of key perceived barriers to participation. In the main these are related to the resource costs of implementation both for state training authorities and private registered training organisations, the market sensitivity of information, and uncertainty about the type and level of data required. Other concerns are related to government intentions to require those seeking registration to have the capability to collect AVETMISS-compliant data. The need to have a more comprehensive record of VET activity is also important for the development of

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[30] Inputs might include entrance grades and the spending per student on facilities. Outputs might include number of first class degrees and graduate employment rates. Processes might include staff—student ratios or retention rates.

more comprehensive sample frames (for the Student Outcomes Survey[31]) for collecting information that in turn will enable better measurement of performance. In 2014 private registered training organisations were required to provide information to AVETMISS on participation; the reporting of these data was mandated for 2015. Successive collections of TVA activity will enable NCVER to improve its ability to provide a more comprehensive picture of public and private provision.

The Unique Student Identifier changes have also progressed and by mid-April 2015 the USI Registrar was fully operational, having issued over a million USIs. The aim is to introduce a VET USI transcript service in 2016. Such a service will enable students to have all their VET activity documented on one transcript.

Other Australian examples for improving the transparency of information include the My School transparency initiatives. The aims are to provide public access to statistical and contextual information about schools which can be used by students and their parents to make comparisons with statistically similar schools across the country. An evaluation of this initiative conducted by the OECD (2012) returned some positive findings about the impact of the My School website on the community and the way that the government went about developing and promoting the policy and aligning this with aims for equitable funding.

The My Skills initiative in the VET sector also aims to enable more informed decision-making. However, before it can be considered to be an effective source of information for current and intending students, the employers who purchase training on behalf of employees, providers and governments, the implementation of the other transparency initiatives already discussed are critical.

The publication of information on the compliance of service providers and the provision of information to aid compliance have also been adopted as a transparency initiative by the children's education and care sector. Associated with this are regulations, processes and instruments for judging performance against the standard and guides to help services and authorised officers to understand the intent of the assessments and ratings and to prepare for assessments. The National Quality Standard Assessment and Rating Instrument (Australian Children's Education and Care Quality Authority 2012a, 2012b, 2012c) is the instrument used by authorised officers to assist them to assess and rate the service against the standard. This instrument can also be used by services to prepare for assessment and rating. This approach (which could be informative for the VET sector) provides a good example of an approach that ensures that those who are to be regulated, as well as the regulators, have access to information which will help them to undertake their roles. The publishing of information on compliance and level of compliance can be used to identify low-risk providers, deter others from non-compliance and as a motivational and developmental means to encourage providers to improve on previous performance.

Such a system, similar to all other ratings systems, relies on the reliability and validity of the judgments made. The implementation of the standard is still in its early stages but, as noted earlier, an evaluation of the ratings of 491 assessments conducted by the Australian Council for Educational Research and reported to the Standing Council of School Education and Early Childhood in December 2012 finds that the reliability and validity of the ratings were robust.

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[31] The Students Outcomes Survey is a survey of VET graduates (those who complete courses) and those who complete a module only. It is conducted on an annual basis by NCVER.

Lessons learnt

The transparency of information about participation and outcomes has become especially critical in the Australian VET sector as state and territory VET systems move towards the increased marketisation of training provision, contestable funding regimes and the application of entitlement systems.
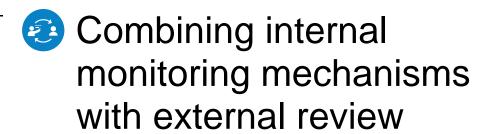
The ability to view the performance of providers on public websites can help students to make informed choices of what and where they want to study, while also enabling governments to apply accountability measures to provider performance, and regulators to apply their risk management processes to quality assurance review processes.

The TVA initiative in the Australian system means that the existing provider collection maintained by NCVER will be expanded to provide a more comprehensive picture of both public and private provision.

If the data collected by national data collection agencies are to be an accurate representation of what is happening on the ground, then it is imperative that requirements are made clear to those who are to provide the data. Keeping data standards current is a critical endeavour.

Keeping data standards current is a critical endeavour.

Combining internal monitoring mechanisms with external review

When institutions make applications to regulators or accreditation agencies for registration, or continuation or renewal of registration, they are generally required to provide evidence of their internal arrangements for ensuring compliance with predetermined quality standards and for continuous improvement. In some systems they are required to document these arrangements in a formal self-study report (or its equivalent); in others they must provide evidence that self-monitoring and self-review or self-assessment has occurred and is embedded in their day-to-day activities. External review panels or inspectors will use this evidence to identify areas for closer investigation in desk-top reviews and follow these up with on-site visits. In some systems on-site visits may include observation of teachers facilitating training and learners performing tasks or assignments (including in the workplace). They may also include consultations with students and employers to verify that training is meeting the needs of students and the labour market. Recommendations for corrective action and improvement will be made.

The approach of combining self-assessment or self-review processes with external reviews by regulators and other third parties is also promoted as a way of reducing unnecessary burden. In systems which make significant use of a self-review or self-study process (Ontario, New Zealand, United Kingdom, South Africa, accrediting agencies in the United States and EU member states) the training organisation must undergo self-review to identify how it believes it has complied with requirements. In a number of European Union member states the need for institutions to undergo self-assessment is also legislated (CEDEFOP 2009). In the United Kingdom and Finland, institutions are also encouraged to undergo peer review, preferably with peers with whom they are not in direct competition. Suggestions are also made to have teaching staff 'deeply engaged' in the process by giving them a greater role in the preparation of the documentation to be presented to auditors, and especially in the addressing of key audit criteria. Other examples include having staff participate in the development of criteria and in the conduct of the internal review processes which invariably precede the external review or on-site visit.

In Australia there are moves by the regulator to introduce some form of self-assessment for registered training organisations. Self-assessment or review combined with external review can be considered as another example of responsive regulation. Collinson (2009), in commenting on the development of an effective system of regulation for further education colleges in the UK, notes that it is important to avoid administratively over-burdensome, excessively costly or highly bureaucratic systems. The aim of such combined approaches, as reported by Collinson, is to allow institutions to get on with their core function of teaching and learning while having enough sanctions in place to deter non-compliance. The use of the self-study or the self-review mechanism helps to reduce regulatory burden on the system and regulators. However, the extent to which this burden is reduced for providers

who must prepare the self-study report is questionable. The challenge is to reduce regulatory burden on both providers and regulators.

The self-study or the self-review combined with external reviews is also a key element in the regulatory frameworks of many accrediting agencies for education and training providers in the United States. Institutions must identify how they are meeting the compliance requirements of the accrediting agency by developing their own 'narratives' and presenting documentation to support their claims.

EU member states

A key feature of quality assurance systems in the European Union member states is the auditing or reviewing of institutional performance (European Commission 2014). In 2013 most EU member states had statutory requirements in place for the external evaluation of providers. In addition there were 22 countries also requiring providers to implement internal quality assurance processes. In a handful of countries such processes were voluntary, although encouraged. The most commonly used external reviews were inspections, especially for initial VET. Other quality systems (for example, ISO 9001 or similar) were encouraged for continuing VET. European Union member states such as the Czech Republic, Denmark, Estonia, Hungary, Slovenia, Slovakia, Bulgaria and Croatia had enacted legislation to require training providers to evaluate their activities, especially the effectiveness of their training. This included mandatory self-assessment and plans for quality improvement to inform external evaluations. The use and encouragement of voluntary self-assessments is commonly reported for those jurisdictions in which they are not mandated. Self-assessments are promoted as mechanisms to enable providers to reflect and enhance their practice, and to apply measures that suit their local situations and needs (European Commission 2014).

New Zealand

A system of internal and external reviews to assure the quality of provision has been adopted in New Zealand by the New Zealand Qualifications Authority.[32] The authority uses a system of up-front accreditation of private training establishments,[33] courses and qualifications, and self-assessment combined with external evaluation and review (New Zealand Qualifications Authority 2009a). The New Zealand Qualifications Authority *d*efines the evaluation questions and key focus areas used to guide the evaluation. As already noted, the external evaluation and review is conducted periodically to provide the authority with 'a statement of confidence (judgment) about an organisation's educational performance and capability in self-assessment' (New Zealand Qualifications Authority 2009a). Educational performance encompasses whether the educational outcomes achieved by the organisation provide value for learners and other stakeholders (in terms of the quality of learning and teaching and the achievement of learners). Capability in self-assessment is concerned with how the organisation uses self-assessment to review its performance and implement improvements; that is, the extent to which it manages its responsibilities for accountability and improvement. The New Zealand Qualifications

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[32] The NZQA has primary responsibility for the quality assurance of tertiary education organisations (including polytechnics, wānanga, government and private training establishments).

[33] Other tertiary education organisations are automatically accredited because they have mandatory public reporting responsibilities.

Authority also provides feedback and guidance to teachers on internal assessments and makes public the information about the quality and relevance of a provider's educational performance and organisational capability. The EER was originally intended to be a developmental exercise, but the fact that organisations were given a rating on their performance across the six evaluation areas and key focus areas — and this was published — added a new dimension. An evaluation of the EER (New Zealand Qualifications Authority 2012) identified some unanticipated consequences by noting that providers were focused more on the ratings aspect of the EER than on its developmental features.

United Kingdom

The Common Inspection Framework endorsed for use from September 2012 applies to training provision that is supported in part by funding agencies (Skills Funding Agency or Education Funding Agency). This means that for VET purposes it applies to institutions providing training and further education to young adults and adults (that is, learners in the 16 to 18-year age group, 19+ age group, and learners aged 14—16). The aim of the Common Inspection Framework is to provide guidelines for the types of things that inspectors will look for when examining and assessing a provider's effectiveness and efficiency of provision. There are three key areas for assessment. These are called the key aspect judgments. A brief overview of some of the key features of these aspect judgments (about learner outcomes, quality of teaching, learning and assessment, and effectiveness of leadership and management), and the other components of the inspectorial system are provided below.

- *Learner outcomes*: Providers must furnish inspectors with evidence of success and progress rates (relative to learner 'starting points and learning goals'), retention, development of personal, social and employability skills, and progression to courses that lead to higher qualifications or sustainable employment in jobs that 'meet local and national needs'. Inspectors will also obtain information from students on the extent to which they have enjoyed their courses and whether the courses met their needs. Inspectors will also want to see evidence that 'achievement gaps are narrowing' between different groups.

- *The quality of teaching, learning and assessment*: Inspectors will expect to find evidence on the extent to which learners benefit from high expectations, engagement, caring and supportive environments and motivated staff. Teachers will be expected to be skilful in identifying learner starting points, planning for, delivering and monitoring student progress, and setting 'challenging tasks that extend learning for all learners'. Inspectors will also want to be assured that students know how to improve their outcomes from teacher feedback on assessments. They will expect this feedback to be timely, specific and accurate. They will also want to see evidence of learners developing the English and mathematics skills which will help them to achieve their learning goals and career aspirations and of appropriate advice and guidance given to support their learning. The extent to which equality, diversity and safety for students are promoted will also be assessed, as will the use of technology in delivery and assessment.

- *The effectiveness of leadership and management*: Here inspectors will expect to see that leaders, managers and governors (if applicable) have high expectations for learners and attain high standards of quality and performance. They will also need to provide evidence of 'rigorous' performance management systems, which align professional

development requirements to performance and include strategies to address 'under-performance'. Inspectors will also look for the extent to which providers can 'successfully plan, develop and manage the curriculum to meet the needs and interests of learners, employers and local and national community'. Information about institutional processes for actively promoting equality and diversity, addressing bullying and discrimination and reducing achievement gaps are also required. Providers must have strong internal processes for monitoring and evaluating their own performance, taking into account 'user' views and putting in place measures for improvement. It is important that information on how 'leaders and managers safeguard' all learners is also made available to inspectors. From September 2014 inspectors were to provide a rating of effectiveness for safety.

- *The self-report*: There is no 'contractual obligation' on providers to complete a formal self-assessment report but a provider must show evidence of having undergone a self-assessment process. This self-assessment, in whatever format, will help inspectors to analyse how the organisation has used self-assessment results to improve its performance. A self-assessment report or equivalent can be uploaded to the relevant Ofsted website for inspectors to read in preparation for inspections, especially in terms of selecting subjects for further scrutiny. The self-assessment process the college has undergone will also provide inspectors with information to enable them to assess the effectiveness of leadership and management. Providers must also show that they have shared this information with the governing body, if applicable.

- *The grading of institutional performance*: A grading schema is also applied to the performance of providers across these three aspect judgments (grade 1: outstanding; grade 2: good; grade 3: requires improvement; and grade 4: inadequate). If any of the components of the three aspects attracts a grade of 'inadequate', then the grading for the whole aspect is to be judged as 'inadequate'. Inspectors will also award a grade for overall effectiveness and will take into account how the provider has met the needs of learners of different characteristics, especially those with learning difficulties and disabilities. They will also take into account the judgments made about the other three aspects (that is, learner outcomes, the quality of teaching, learning and assessment, and effectiveness of leadership and management). An overall effectiveness rating of 'outstanding', 'good', 'requires improvement', or 'inadequate' is then applied. Typically, this judgment has been used to identify the nature and frequency of further reviews. In October 2014 Ofsted launched a consultation strategy about how to improve the system. It noted that 'the oversight that we have between our inspections is not as effective as it should be. At the moment, it can be five years or even more between inspections for a good school or college. This is too long' (Ofsted 2014, p.4). The proposal was for 'good' schools to receive a short inspection every three years (unless there had been a dramatic decline in performance). Annual summaries of school performance information would be available on the Ofsted website. Some shorter inspection pilots have been established.

- *The code of conduct for inspectors*: The Common Inspection Framework also has a code of conduct for inspectors and a grievance procedure. The code refers to inspectors being expected to conduct objective and impartial evaluations 'in line with frameworks, national standards or requirements'. Using evidence-based analysis, inspectors must provide, fair, reliable and reasonable judgments, honesty in reporting, and have no

The Common Inspection Framework has a code of conduct for inspectors and a grievance procedure.

conflict of interest. Those who have complaints about the inspection process can also undergo the grievance and complaints process.

South Africa

Self-reviews are also a feature of quality assurance processes for higher education in South Africa. Here the Higher Education Quality Council (HEQC) asks institutions to conduct their own self-review prior to audit. An evaluative study of institutional audits of universities conducted in South Africa in 2006 (South African Higher Education Quality Council, Higher Education Quality Committee 2006) discusses how the Higher Education Quality Council in South Africa has tried to encourage institutions to consider audit as a developmental rather than a judgmental exercise and to promote self-reflection and improvement rather than mere compliance with policy and regulations. The Higher Education Quality Council also advises on the importance of involving staff in addressing criteria and in auditing interviews, and preparing staff and auditors for their roles in regulation. The council also supports the notion that both auditors and auditees need to be adequately prepared to take part in audit interviews.

Finland

The Finnish National Board of Education notes that, prior to the 1990s, quality assurance of VET was based on 'norms' and inspections. With the decentralisation of the educational system in the 1990s there has been an attempt to use quality assurance processes to 'strengthen quality assurance across the system'. Legislation is used to oblige providers to undertake self-assessment and participate in external evaluations. The results of these evaluations are also published. External evaluations are conducted by an independent evaluation agency under the Ministry of Education and Culture. The focus is on providing information for the further development of providers. There is no ranking of institutions. A quality assurance strategy (2010—20) has been established with the aim of ensuring that 'all providers apply effective quality assurance systems and that their education personnel have the necessary competencies and commitment' (Finnish National Board of Education[34]). Peer learning and peer review are also key features of the Finnish QA system. Providers are also required to meet the objectives set out in the qualification requirements, in conjunction with enterprises.

Australia

The self-review report is not a condition of audits in the current Australian VET system, but a common practice in public providers (TAFE institutes) has been to give specific responsibility for quality management or oversight to specialised units, specific individuals or branches. These groups will take the main role for ensuring that the organisation has established the various systems, processes and documentation required for presentation to auditors and the lead role in preparing the organisation for quality audits. The Misko and Halliday Wynes (2009) report describes how specialised quality units in large TAFEs can take the lead in ensuring that the organisation is meeting the standards and that staff are kept

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[34] <http://www.oph.fi/download/148963_Quality_assurance_in_vocational_education_and_training_ in_Finland.pdf>, viewed May 2014.

informed of impending quality audits and their respective responsibilities in this regard. This approach helps to lighten the load on practitioners at faculty level on a variety of fronts.

Lessons learnt

The combination of self-report with external review is a key feature of a number of VET systems overseas. The self-study or self-report in some systems is used to help auditors or inspectors to prepare for on-site evaluations or inspections of performance, to award or renew accreditations, or to provide a vehicle for developing institutional capacity for self-evaluation.

Whatever its purpose, it is clear that the preparation of a self-study or self-report is a major undertaking for institutions and regulating agencies alike and will have to be resourced appropriately. For institutions, the preparation of the self-report requires high commitment and support from senior managers, and dedicated attention and effort from the practitioners or administrators who have been allocated the responsibility for collecting, analysing and reporting the required information. For regulators, the decision to implement the self-study approach will require them to develop guidelines for the development of the reports, along with guidelines for their analysis and review. Getting providers to accept the shift or change in expectations will also be a major activity. Nevertheless, the exercise of self-review and preparation of a self-study report offers a good training ground for providers and can help to embed good practice in their everyday activities. However, we must ensure that a focus on the preparation of the report or similar documents does not take precedence over teaching and learning. One way to avoid this is to take practitioners offline to help in the preparation of such a report or to have dedicated units charged with the responsibility of collecting information and preparing it for reporting.

Ofsted's Common Inspection Framework includes requirements for inspectors to undertake observations of teachers in classrooms. If such arrangements are to be applied to the VET sector in Australia, they will have to be well resourced in terms of induction for auditors (or inspectors) and time spent by auditors (or inspectors) on site. There will also have to be a shift in the culture of VET practitioners for them to accept higher levels of scrutiny by external agencies.

The New Zealand EER approach is another worthy of attention, especially as it aims to help providers to develop their capacity for self-assessment. However, it is also useful to learn from the New Zealand experience and to make firm decisions about how to promote the approach to providers, so that trust between regulators and providers is maintained.

Administrators must decide on a healthy balance between prescription and flexibility.

⚖ Conclusions

This overview has provided examples of practices and procedures from overseas VET bodies which may assist in the understanding of regulation and quality assurance in VET. However, it is important to keep in mind that the various approaches adopted in these systems may be contextually driven by cultural norms and historical traditions and may not easily transfer to the Australian context.

Issues for consideration

- It is clear that standards written in clear and easy-to-understand language and which are not too complicated or onerous to implement can help to drive improved regulatory compliance and effective training provision. The streamlining of standards at the broad level may increase rather than decrease complexity, as they will then require far more detailed guidelines, explanations and cross-referencing at another level. There is also the risk that, in the quest for rationalisation, the standards lose the prominence they once had as stand-alone requirements.

- In developing regulatory frameworks and standards, however, it is also important to recognise that highly prescriptive standards can inhibit compliant behaviour as well as effective continuous improvement and innovation activities. Moreover, they may distract the attention of educators from their primary functions of teaching and learning. In contrast, highly flexible standards may risk the quality of provision and the reputation of systems. Administrators must decide on a healthy balance between prescription and flexibility.

- Outcomes-based measures of institutional performance can help individuals to make informed choices about where they want to study, and governments to make policy and funding decisions. Their usefulness, however, is highly dependent on the robustness and accuracy of participation and outcomes data and the mechanisms available for data collection. Outcomes-based performance measures (including targets for performance) may help to provide some objective metrics for evaluating performance, but they are highly dependent on the relevance of the outcomes to providers, students and governments. There is also the risk that quality may be neglected if targets over-emphasise raising participation or lowering drop-out rates at the expense of quality learning.

- A self-study or self-review exercise is increasingly being used to prepare for institutional external reviews. This may or may not involve the preparation of a written report. Regardless of whether a written report is required, the self-study is a major undertaking for institutions and regulating agencies alike and will have to be resourced appropriately. Regulators will have to provide appropriate guidelines for the development of the review and follow-up advice once the external review has been completed. Senior managers in institutions will need to have available staff with leadership and a commitment to its preparation, as well as adequate support and resources (staffing and time) for the practitioners or administrators who have been allocated the responsibility for preparing the review. These practitioners need to apply attention and effort to the collection, analysis and reporting of the required

information. The challenge is to embed the requirements of the review into the regular routines of institutional administration. Again, the risk is that a focus on the review may distract the attention of training practitioners from their primary functions of teaching and learning.

- A risk-based approach to regulation can help to reduce regulatory burden. However, this approach requires the regulator to have sufficient information to be able to identify those institutions that are a risk to the system and those that are not. This requires having good intelligence mechanisms as well as a system for dealing with praiseworthy performance, performance that requires improvement and performance warranting the application of more punitive sanctions.

Concluding remark

In considering the extent to which the processes adopted in other countries and other sectors will work for the Australian VET environment, it is important to understand that some of this nation's key training paradigms may need to be altered. In the German dual system the industry chambers are responsible for assessments in apprenticeships. They do this via examination committees, which comprise employer, union and vocational teachers, and these have a formal role in setting and assessing apprenticeship examinations. Such approaches give an external and independent focus to the assessments themselves as well as provide indicators of institutional performance. If we were to adopt such an approach in the Australian context, we may need to review the Australian system where the trainers themselves are responsible for both the delivery of training and the assessment of students' knowledge and performance.

In the United Kingdom, Ofsted's Common Inspection Framework includes requirements for inspectors to observe teachers in classrooms. If such arrangements were to be applied to the VET sector in Australia, they would have to be well resourced in terms of induction for auditors (or inspectors) and time spent by auditors (or inspectors) on site. There would also have to be a shift in the culture of VET practitioners such that they would accept higher levels of external scrutiny.

A risk-based approach to regulation can help to reduce regulatory burden.
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📎 Appendix A

The accreditation standards of the Accrediting Commission of Career Schools and Colleges[35] also cover a broad range of areas. Each standard is preceded by a statement of purpose and is followed by detailed elements of the standard. The standards and the items they cover comprise:

- Management and administrative operations (management and administrative capacity, leadership/transformation, institutional assessment, improvement and planning, financial stability and responsibility, tuition polices, student loan repayment, physical facilities improvement)

- Program requirements (program design and development, program organisation and length, program evaluation, instructional materials and equipment, program advisory committee, learning resource system, externships, consortium, partnership or contractual arrangements, independent study, transfer of credit, degrees and courses, secondary educational objectives)

- Educational administration and faculty qualifications (educational administration, faculty qualifications, graduate degree faculty requirements, faculty improvement planning)

- Student recruitment, advertising and disclosures (recruitment, advertising and promotion, enrolment agreement, graduate employment, accreditation and approval)

- Admissions, policies and practices (general requirements, non-degree programs, degree programs [undergraduate], degree programs [graduate], ESL courses)

- Student services (advising and counselling, student records, graduate employment assistance and records, student complaints)

- Student learning, assessment, progress and achievement (student learning, assessment, and satisfactory progress, student achievement, student achievement monitoring and reporting)

- Additional criteria for separate facilities (classification: branch campus, satellite location, responsibility, ownership, name, relationship, and advertising, programs)

- Distance education (management and administration, objectives and student achievement, programs, curricula and resources, catalog and advertising, admissions requirements and enrolments, faculty, student services).

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[35] The ACCSC is the accrediting body for private degree-granting and non-degree-granting post-secondary institutions offering career-related programs in the United States.

📎 Appendix B

Table B1   Industry skills councils and industry covered as at June 2015[36]

Name of ISC	Industry sectors covered
Agrifood Skills Australia	Agriculture, conservation and land management, horticulture, animal care and land management, food, beverage, pharmaceutical processing, meat, seafood, racing (greyhound, thoroughbred, and harness)
Autoskills Australia	Auto electrical, bicycles, marine, mechanical and specialisation, mechanical heavy vehicle, outdoor power and equipment, sales, parts administration, vehicle body, vehicle manufacture
Construction and Property Services Industry Skills Council (CPSISC)	Building and construction, property services (asset management, security)
Community Services and Health	Oral and dental health, community care, home and community care, enrolled nursing, ambulance, disabilities, childcare, children of youth services health complementary and alternative health, technical and health support, allied health assistance, aged care, celebrancy, first-aid, pathology, Aboriginal and Torres Strait Islander, primary health work, client services, leisure and health, health services assistance, alcohol and other drugs.
Energy Skills Australia (Eoz)	Electrotechnology, electrical distribution, transmission and rail, electrical generation, gas transmission
Forestworks	Forest, wood, and paper and timber products
Government Skills Australia (GSA)	Government, community safety, and water
Innovation and Business Skills Australia (IBSA)	Business services, cultural and related industries, ICT and telecommunications, training and education, printing and graphic arts
Manufacturing Skills Australia (MSA)	Aerospace, chemical hydrocarbons and recreational vehicles (caravans, motorhomes and camper trailers)
Service Skills Australia	Hospitality, catering, fitness, sport, retail, outdoor recreation, wholesaling, pharmacy, funeral services, beauty, hairdressing, tourism and travel, community pharmacy, community recreation, events, floristry, holiday parks
Skills DMC	Civil infrastructure, coal mining, construction materials, drilling, metalliferous mining
Transport Industry Skills Council	Aviation, logistics, maritime, ports, railroad transport, transport, warehousing, mining, drilling metalliferous, civil construction, extractive, coal, quarrying

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[36] The role of bodies like industry skills councils and other advisory committees were to be dramatically altered and although the industry skills councils were still in operation by June 2015 their contracts were set to be finalised by December of 2015.

Table B2   New Zealand industry training organisations, by industry sector, 2014

Name of ITO	Industry sectors covered
Building and Construction ITO	Carpentry; cement and concrete; floor and wall tiling; frame and truss manufacturing; interior systems; proprietary plaster and cladding systems; solid plastering; brick and block laying; historical masonry trades; construction management; architectural technology; quantity surveying; flooring, painting, and paperhanging (painting and decorating); joinery; glass and glazing; architectural aluminium joinery; and kitchen design.
Careerforce	Health, aged care, disability, mental health and addiction, social services, contract cleaning and urban pest management
Competenz	Food and beverage processing, engineering, refrigeration, heating, air conditioning, locksmithing, fire alarms and protection systems, retail meat, forest management and establishment, silviculture, harvesting, solid wood processing, pulp and paper, wood panels, biosecurity, furniture manufacturing, finishing, upholstery, cabinet making, retail, plastics production, glass container manufacturing, paint, ink and resin manufacturing, pharmaceutical and allied products manufacturing, apparel and textiles manufacturing, laundry and dry cleaning; print, packaging, journalism, and signmaking
Emqual – emergency management qualifications	Fire – urban, vegetation, industrial and airport; search and rescue – land and maritime; New Zealand coordinated incident management system and urban search and rescue; workplace emergency requirements; civil defence
HITO – New Zealand Hair and Beauty ITO	Hairdressing, barbering, beauty services, salon management
Connexis	Road construction and maintenance, civil engineering works, demolition, agricultural contracting and spraying, road marking and bitumen industries, surveying, planning and associated activities in an infrastructure construction process; management of power systems and assets, design, construction, operation, and maintenance of the production, transmission and utilisation of the electrical energy industry
MITO	Motor, industrial textile fabrication, commercial road transport, passenger services, warehousing and logistics, stevedoring and ports; quarrying, mining, drilling, explosives, tunnelling, gas, petrochemicals, abrasive blasting, protective coatings, resource recovery, waste management, steam, and hazardous gases.
NZ Marine Industry Training	Boatbuilding, marine sales and services, marina operations and services, composites manufacturing.
Primary ITO	Farming, wool handling, classing and shearing, stock and station, fencing, water supply and wastewater, agribusiness, poultry, equine; plant and forest nursery, fruit and vegetable production, floristry, landscaping, arboriculture; dairy manufacturing, meat processing (excluding poultry), leather manufacturing, animal products inspection, baking yeasts manufacturing, fellmongery, and seafood.
SERVICE IQ	Accommodation; aviation; cafes, bars and restaurants; food services; museums; quick service restaurants; retail; tourism; travel; wholesale.
Skills Active	Sport, fitness, community recreation, outdoor recreation, snowsport, and nga mahi a te rehia
Skills Organisation	Ambulance, contact centre, electrotechnology, financial services, offender management, security, telecommunications, real estate services, public sector and local government; plumbing, gasfitting, drainlaying and roofing; power crane operation, rigging and slinging loads, scaffolding, rigging and industrial rope access

Table B3   United Kingdom: sector skills councils and sector skills bodies, by industry sector coverage

Name of SSC	Industry sectors covered
Building Futures Group	Facilities management, housing, property, cleaning and parking
Cogent	Chemicals, pharmaceuticals, nuclear, oil and gas, petroleum and polymer industries
Construction Skills	Construction
Creative and Cultural Skills	Craft, cultural heritage, design, literature, music, performing and visual arts
E-skillls UK	Software, internet and web, IT services, telecommunications, and business change
Energy and utility skills	Gas, power, waste management and water industries
Financial Skills Partnership	Finance, accountancy and financial services
IMI (The Institute of the Motor Industry)	Retail motor industry
Improve	Food and drink manufacturing and associated supply chain
LANTRA	Land management and production, animal health and welfare, and environmental industries
People 1st	Hospitality, leisure, passenger transport, travel and tourism
SEMTA	Science, engineering and manufacturing technologies
Skills for Care and Development	Social care, children, early years and young people's workforces
Creative Skills	TV, film, interactive media, animation, computer games, facilities, photo imaging, publishing, advertising, and fashion and textiles
Skills Active	Sport, fitness, outdoors, playwork, caravans, hair and beauty
Skills for Health	Health
Skills for Justice	Community justice, court services, custodial care, fire and rescue, forensic science, policing and law enforcement and prosecution services
Skills for Logistics	Freight logistics and wholesaling industry
Summit Skills (SSC)	Building services engineering

Name of SSB	Industry sectors covered
Skills CFA (SSB)	Business and administration, customer service, enterprise and business support, human resources and recruitment, industrial relations, leadership and management, marketing and sales
Proskills (SSB)	Printing, mineral extraction and processing, health and safety and process and manufacturing of furniture, glass, ceramics, coatings and paper
Skills for security (SSB)	Security
Summit Skills (SSB)	Building services engineering
ecITB (SSB)	Engineering construction industry training board