

AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES AUDIT REPORT

| AQTF 2007 Standards for State and territory Registering Bodies Summary | | | |
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| Standard 1: Regulatory activities ensure nationally consistent registration outcomes. | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> |
| <p>The NARA national model for engaging and then auditing RTOs is unique amongst the Australian AQTF Registration Bodies. NARA has spent considerable time researching some of the apparent variations amongst jurisdictions in the way the AQTF standards are implemented. NARA maintains an ongoing dialogue with many jurisdictions to further calibrate the approach and tools it uses for training. NARA places significant effort into developing and moderating its consultant/auditor base and also runs many workshops on a variety of key topics for RTOs around Australia.</p> | | | |
| Strengths | | | |
| <p>The NARA national model presents several challenges which NARA appears to be managing quite effectively. The ongoing professional development of the consultant/auditor base is clearly one significant area. NARA already has a significant pool of resources resulting from the ongoing engagement with individual jurisdictions and stakeholders. Worked scenarios with 'understandings' are produced for moderation purposes from a variety of sources including letters, emails, phone call notes, presentations and workshops. Furthermore audio recordings of some seminars run by invited speakers from jurisdictions are also circulated to all auditors.</p> <p>NARA's ICiX on line AQTF management tool appears to offer considerable versatility and functionality to empower RTOs to administer their own details on the NTIS - especially some aspects of the Essential AQTF applications and some conditions of registration. (Relates to Principles – Consistency and Transparency).</p> | | | |
| Opportunities for Improvement | | | |
| <p>Several discussion sessions with auditors indicated there was consistency on how they would approach a number of scenarios in areas such as engaging with a prospective RTO and the grounds on which they might refuse to act as consultants. I was less clear adequate consideration has been given to the capability expected of RTOs at certain key stages in the process of RTO engagement. For example opinion varied on the amount of evidence expected or level of engagement needed to support RTO registration at the initial (ie without students) and 12 month audit (after students have been enrolled). While NARA has a clear level of understanding, this is an example of an area where the consultant/auditor beliefs and their respective roles may need to be more closely managed by NARA.</p> <p>Careful articulation of key risks and abatements at these stages for the various types of registration activities should assist NARA to address these needs. Similarly development of several appropriate tools may also help empower RTOs to understand when they might be ready for registration, extension to scope and re-registration. More detail could be made available to stakeholders on how NARA will conduct audits and what the expectations of RTOs might be. (Also relates to Principles – Consistency, Transparency and Effectiveness).</p> <p>There is an expanding resource pool of over 20 bulletins, moderation rulings, training notes, seminars and related communications. The challenge for NARA is the logical ordering and access to this information that is now widely spread, so that its auditors are aware of the existence of the information at the point when it is needed. A classification system or database might be one tool to help manage this</p> | | | |

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information.

As its experience in auditing grows, NARA may benefit from more clearly articulating and defining its particular model or 'brand' of RTO engagement. This could also involve consideration and development of some 'indicators of success' for its chosen model so that NARA can ascertain if it is improving in its role and functions.

Standard 2: regulatory services meet the needs of industry and clients.

Audit conclusion

Compliant

Non-compliant

Not audited

NARA has adopted a pragmatic approach to the engagement of key industry bodies and regulators by entering into formal relationships with the same bodies as used by the jurisdictions for which NARA has delegation.

NARA may wish to give further consideration as to how it can ascertain the needs of learners and other clients of RTOs.

Strengths

NARA has developed a useful and comprehensive decision tree (a spreadsheet based tool) that helps apportion relative risks in its RTO applications into a high/medium/low profiles (Relates to Principle – Proportionality). This tool guides the approach and also helps with resource allocation.

NARA has arrangements in place with jurisdictions from who it has received delegation to, where practicable; use the same industry technical advisors or representatives to assist when specialist advice is needed in an audit (Relates to Principle – Consistency).

Opportunities for Improvement

NARA might wish to consider how it could improve its 'decision tree' model by reflecting on the strength or suitability of this tool for the various scenarios in which it has been used.

In its AR022 letter template NARA advises the applicant on the level of RTO risk it has decided from the application. There could be benefit from informing the RTO of the actual reason for this level of assessment in the letter to the RTO as it could form the basis for a useful dialogue with the client (Relates to Principles – Transparency and Responsiveness).

As it undertakes further RTO audits, NARA may wish to consider how it ascertains the needs of learners and other clients of these RTOs.

I reviewed NARA's approach to managing RTO complaints. There was one recent example of an issue raised by another jurisdiction. The complaint appeared to have been addressed by NARA in a methodical fashion although the outcomes were inconclusive. NARA may benefit from continuing to engage with jurisdictions, especially from where it has delegation, to discuss issues relating to an RTO's history from the relevant jurisdiction when these circumstances arise. In cases of complaints raised by other stakeholders or jurisdictions, NARA should advise the jurisdiction of the outcome of the investigation (Relates to Principle – Transparency).

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| Standard 3: Management systems are responsive to the needs of the VET sector. | | |
|--|---|---|
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> Not audited <input type="checkbox"/> |
| <p>NARA is actively and systematically evolving its Quality Management system to accommodate the increasing numbers of clients and the sophistication of its operations. NARA also works extensively with other jurisdictions to help understand its delegation roles.</p> <p>NARA uses its internal audit assessment tool particularly well to evolve its systems and indeed in the following sections of the report I was also able to quite effectively reflect on these internal audit findings (due to the limited number of RTOs) to reach my conclusions.</p> <p>It is suggested that self assessments are scheduled across the year to allow more ongoing and systematic feedback.</p> | | |
| Strengths | | |
| <p>NARA is using its self assessment tool effectively to implement continual improvement by updating all processes and procedures where relevant. As an example Self assessments have been used by NARA to validate its approach against those contained in the more recent AQTF Guidelines. This allowed identification of a number of compliance issues and provided an ongoing review of various aspects of internal management. Compliance issues noted included 'informing RTOs of their risk rating', 'appeals against ratings', 'Lodgement of Complaints' and 'Established Agreements with industry regulators'.</p> | | |
| Opportunities for Improvement | | |
| <p>NARA may benefit from developing a schedule for spreading its audits over eg a 12 month period based on its approach to internal risk. This would still allow sufficient flexibility to follow issues as they arise (Relates to Principles – Consistency and Responsiveness). This would seem to be a particularly useful and effective review tool for a young organisation to fine tune its approach to auditing under the AQTF.</p> | | |

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AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES STANDARDS AND ELEMENTS

Standard 1: Regulatory activities ensure nationally consistent registration outcomes

1.1 Registering bodies continuously improve national consistency in registration functions by acting on relevant data and by benchmarking with registering bodies in other jurisdictions.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

State/Territory Registering Body documents: Legislation, procedures, publications, NARA's 2008 self assessment:

- QMS Procedure 001a – Scheduled and ongoing review of processes
- QMS Procedure 001c – Annual reporting to NQC. (Reporting to R/CABS also required under delegations)
- QMS Procedure 006b – Step 7 (national moderation activity)
- QMS Procedures 006c & 006d – Monitoring, action and professional development activities taken in line with relevant data and benchmarks
- NARA is an active participant of NRATC group
- QMS records clearly show a continual improvement as NARA expands its operations.

Findings

Staff interviews show variety of ongoing continuous improvement activities, most QMS documents have several archived versions generally indicating a systematic evolution in response to internal review and external activities. Benchmarking occurs with other registering bodies through the delegation instruments and accompanying legislation NARA complies with, eg:

- South Australia (Guidelines for RTOs)
- Queensland (Fee requirements)

Benchmarking also occurs via involvement in the NRATC group and regularly reviewing other registering body publications and websites.

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| 1.2 Communication strategies that support state and territory registration functions and based on nationally agreed resources and are consistent with national decisions. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Moderation session summary documents, QMS forms relative to RTO applications, presentation resources (PowerPoint, supporting notes), NARA website, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 002a & 002b – Information provided to organisations on eligibility is based on TVET Charter • QMS Procedure 002d – As above. • QMS Procedure 005a – Communication with relevant parties follows national guideline requirements. • QMS Procedure 006b – Moderation sessions and outcomes utilise information in accordance with nationally agreed resources and decisions. • QMS Procedure 006c & 006d – Monitoring, action and professional development information take into account information in accordance with nationally agreed resources and decisions. • NARA uses the nationally agreed forms for applications for initial and re-registration, to cancel registration, and to amend scope of registration. • NARA uses the nationally agreed audit report template. | | | | |
| Findings | | | | |
| Information communicated relating to registration functions undertaken by NARA, makes reference to and are consistent with nationally agreed resources. | | | | |

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1.3 Regulatory activities are guided by a nationally consistent risk-management approach. They are based on RTOs performance against nationally agreed quality indicators and assessment of the risk level attributed to their operations.

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| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Risk assessment tools (AR001 – AR007, AR036, AR039), risk assessment activities undertaken for RTO applications, moderation session summary documents, NARA’s 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003b & 003c – Audit scoping tools are based on the national guideline and take into account available quality indicator data. • QMS Procedure 003d – Audit scope is taken into account when reviewing audit report and recommending action. • QMS Procedure 003e - Audit scope is taken into account when reviewing audit recommendations and determining action. • QMS Procedure 006b – Quality indicators are incorporated into moderation sessions. • QMS Procedure 006c | | | | |
| Findings | | | | |
| <p>The risk assessment tools enable a consistent approach to utilising and interpreting the information included in the national risk management guideline. QMS procedures reflect the risk management approach as described in the national guideline. Moderation sessions have been conducted based on the risk management approach and upcoming quality indicator data. For risk assessment activities undertaken to date, the QMS procedures have been applied, reviewed and modified based on the initial implementation of the risk assessment process. (Also supports the continuous improvement process).</p> | | | | |

1.4 Consistency in auditors’ judgements is maintained through national and jurisdictional moderation of audits.

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| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Auditor moderation records, national auditor moderation feedback document (Darwin May 08), NARA’s 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003c – Steps 7 & 8 (Feedback will identify patterns of consistency and areas for moderation). • QMS Procedure 003d – Step 1 as above. • QMS Procedure 006b – Steps 6 & 7 (Moderation sessions include audit process). • QMS Procedure 006c & 006d – Monitoring, action and professional development can include consistency of auditor judgement. • NARA contracted auditors need to regularly participate in moderation activities. | | | | |
| Findings | | | | |
| <p>The NARA moderation program has been active since late 2007. Records indicate a high level of participation by auditors despite there being no</p> | | | | |

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delegations in place for much of this time. NARA participated in the National Auditor Moderation workshops in October 07 and May 08. NARA presented a session at the May 08 workshop. NARA have documented feedback (such as AQTF National Moderation Workshop for Auditors Darwin, 20 – 21 May 2008) that indicates this session was well received.

1.5 Sanctions and conditions applied to RTOs are in accordance with national guidelines.

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| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003d – Recommendations to GM NARA are made in accordance with national guidelines. • QMS Procedure 003e – Actions to be taken are determined in accordance with national guidelines. | | | | |
| Findings | | | | |
| NARA claims it has not been in a position to operationalise procedures relating to this element to date. Staff interviewed demonstrate an understanding of the process and relevant national guidelines. | | | | |

Standard 2: Regulatory services meet the needs of industry and clients

2.1 Regulatory services are continuously improved by acting on data from:

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| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Archive files for QMS documents, moderation session summaries, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 001a – Feedback from groups is a continuous improvement process. • QMS Procedure 003d – Review of the audit report can provide feedback for the continuous improvement process. • NARA is continuing to improve its regulatory practices through the relationships its Client Relationship Managers build with different types of RTOs and the peak stakeholder groups which represent them. • QMS history demonstrates a continuous improvement approach as NARA becomes operational | | | | |

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| Findings |
| Staff interviews identified ongoing continuous improvement activities. Archived files show previous versions of QMS documents. The first NARA RTO audit resulted in the review and improvement of several QMS procedures based on feedback from the RTO and auditors. In addition the review led to the development of additional audit tools around scoping and budget planning. NARA has included ISC's Training Package developers and RTOs in the auditor moderation program. NARA claims it is continuing to build relationships with key stakeholder groups in anticipation of further delegations. |

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| 2.2 Regulatory responses are proportionate to each RTO's performance against nationally agreed outcomes and the risk level attributed to its operations. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Audit records for first NARA RTO audit, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003b – Risk assessment tools take into account the RTO performance against performance risk indicators to determine a risk rating and audit approach. • QMS Procedure 003c – Audit takes into account the RTO performance and risk. • QMS Procedure 003d – Recommendations based on the audit report take into account the RTO performance and risk. • QMS Procedure 003e – Actions determined take into account the RTO performance and risk. | | | | |
| Findings | | | | |
| NARA has undertaken one audit to date; staff interviewed demonstrated an understanding of the process and relevant national guidelines. Staff also identified minor improvements to the QMS process during the internal audit. Records of the first audit undertaken by NARA indicate the QMS procedures were followed and applied appropriately. | | | | |

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| 2.3 Industry regulators and occupational licensing bodies that use certification form the VET sector are appropriately engaged in regulatory arrangements for the sector. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |

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Evidence reviewed against the Essential Element:

NARA's 2008 self-assessment:

- QMS Procedure 003b – Audit scoping tools indicate situations where industry regulators and occupational licensing bodies are to be consulted for audit.
- QMS Procedure 003c – Audit is conducted taking into account the national guideline where technical experts form part of the audit team.
- NARA is aware that it needs to develop protocols with States and Territories (as well as peak national industry and occupational licensing bodies) regarding the use of technical experts.

Findings

NARA claims it has not yet required the services of industry regulators/technical experts at audit. Scoping processes undertaken appear to comply with national guideline in relation to identifying where these services are required. Staff interviewed demonstrated an understanding of the process and relevant national guidelines.

2.4 Complaints and appeals about RTOs and regulatory services are resolved efficiently and effectively, and in accordance with National Quality Council policy.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

There is one record to date of a complaint against an RTO lodged by an industry stakeholder:

- QMS Procedure 004a – Appeals lodged by an RTO follow the parent State/Territory appeals process as defined in the TVET Charter
- QMS Procedure 005a – The complaints management process takes into account requirements of the national guideline
- Report to the NRATC group on the national complaints benchmarking workshop

Findings

Staff interviews identified some clarity needed around staff roles in the appeals process for RTOs. NARA notes that the recent complaints benchmarking workshop facilitated by the NRATC group included a presentation of its complaints management process indicating how the process complies with the national guideline. The report of the workshop outcomes provided to NRATC did not provide information on the presentations given by NARA or other R/CABs in terms of how they comply with the national guideline or any indication on national consistency. The records to date for the complaint investigation NARA has underway indicate the national guideline and QMS procedure 005a are being followed.

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Standard 3: Management systems are responsive to the needs of the VET sector

3.1 Registering bodies continuously improve their management of registration functions by acting on relevant data and benchmarking with registering bodies in other jurisdictions.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

NARA's 2008 self-assessment:

- QMS Procedure 001a - Scheduled and ongoing review of processes
- QMS Procedure 001c - Annual reporting to NQC. (Reporting to R/CABS also required under delegations)
- QMS Procedure 006c & 006d - Monitoring, action and professional development activities contribute to the continuous improvement process.
- NARA participates as a member of the NRATC group
- QMS history demonstrates an ongoing continuous improvement approach.

Findings

Staff interviews identified ongoing continuous improvement activities, backed up by the QMS archive files. Staff interviews also identified several opportunities for review and improvement of the QMS documents during the self assessment process. Benchmarking activity against other registering bodies occurs via the delegation instruments and legislative requirements NARA is required to comply with, examples of which are:

- South Australia (Guidelines for RTOs)
- Queensland (Fee requirements)

Other benchmarking activities include NARA's involvement in the NRATC group and regularly reviewing other registering body publications and websites.

3.2 Registration functions are managed through a defined and documented quality system that is regularly reviewed to ensure its continuing suitability and effectiveness.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

NARA's 2008 self-assessment:

- See TVET Australia NARA Policies and Procedures and particularly Policy 1: quality assurance and continuous improvement, and procedures NAR001a and NAR001b.

Findings

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Staff interviews identified the documented QMS is used as a tool to manage registration functions, and reviews are both scheduled and conducted on an as needs basis. Evidence of review and improvement is apparent in the QMS archive files containing previous versions.

3.3 Where registration functions are delegated, the registering body ensures compliance with all relevant standards and procedures so that decisions by delegates are nationally consistent.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

NIL

Findings

The findings in relation to the requirements of the element

NARA reports to parent State/Territory R/CABs under delegation arrangements as defined by the delegation instrument.

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AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES: QUALITY INDICATORS

Quality Indicator 1: Consistency

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| The extent to which the regulatory process and outcomes from each registering body are consistent with: | | | | |
| <ul style="list-style-type: none"> • National standards and guidelines, and • The processes and outcomes of other registering bodies | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Records relating to the first audit undertaken by NARA, auditor moderation records, TVET Charter and delegation instruments, NARA's 2008 self assessment:</p> <ul style="list-style-type: none"> <li style="width: 25%;">• QMS Procedure 001a <li style="width: 25%;">• QMS Procedure 003b <li style="width: 25%;">• QMS Procedure 003e <li style="width: 25%;">• QMS Procedure 006c <li style="width: 25%;">• QMS Procedure 001b <li style="width: 25%;">• QMS Procedure 003c <li style="width: 25%;">• QMS Procedure 005a <li style="width: 25%;">• QMS Procedure 006d <li style="width: 25%;">• QMS Procedure 001c <li style="width: 25%;">• QMS Procedure 003d <li style="width: 25%;">• QMS Procedure 006b <li style="width: 25%;">• NRATC membership | | | | |
| Findings | | | | |
| <p>Staff interviews identified an understanding of the requirements to ensure consistency of process and outcome in the application of the QMS procedures. Staff interviews also identified several opportunities for review and improvement of the QMS documents relevant to the issue of national consistency during the internal audit process. The records of the first audit undertaken by NARA are consistent with the requirements of national standards and guidelines. An indication of NARA's ability to continually demonstrate consistency in the audit process will be able to be assessed with more audit activity. Auditor moderation records reflect the issue of national consistency as a common and continuing theme. The TVET Charter and delegation instruments outline requirements for consistency with State/Territory procedures (see findings for standard 1.1). Benchmarking and consistency of outcomes is a reoccurring theme for NRATC. Note: NARA adopts State/Territory processes as required in delegation instruments.</p> | | | | |

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Quality Indicator 2: Effectiveness

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| The extent to which registering bodies ensure that: <ul style="list-style-type: none"> • Only those organisations meeting the AQTF 2001 <i>Essential Standards for Registration</i> are registered, and • RTOs continue to operate in accordance with these standards | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Records relating to the first audit undertaken by NARA, NARA model (use of Quality Consultants), NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003b • QMS Procedure 003c • QMS Procedure 003d • QMS Procedure 003e • QMS Procedure 005a • QMS Procedure 006b • QMS Procedure 006c • QMS Procedure 006d | | | | |
| Findings | | | | |
| <p>Staff interviews identified an understanding of the requirements to ensure only RTOs who meet the AQTF Standards are registered and continue to operate in accordance with these standards in the application of the QMS procedures. The records of the first audit undertaken by NARA reflect the QMS procedures are applied to meet the requirements of this Quality Indicator. It is noted that a review of the QMS procedures was undertaken at the conclusion of this audit and improvements made as a result. The consultant model has yet to be fully tested; however NARA claim the requirement that QC also act as auditors and participate in moderation activities should influence the advice given as a QC to RTOs.</p> | | | | |

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Quality Indicator 3: Proportionality

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| The extent to which regulatory processes and decisions are guided by: | | | | |
| <ul style="list-style-type: none"> • The performance of an RTO in relation to the AQTF 2007 <i>Essential Standards for Registration</i>, and • The assessed risk in relation to the context of the RTOs operations | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Records relating to the first audit undertaken by NARA, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003b • QMS Procedure 003c • QMS Procedure 003d • QMS Procedure 003e • QMS Procedure 006b • QMS Procedure 006c • QMS Procedure 006d | | | | |
| Findings | | | | |
| <p>Staff interviews identified an understanding of the requirements to ensure only RTOs who meet the AQTF Standards are registered and continue to operate in accordance with these standards in the application of the QMS procedures. The records of the first audit undertaken by NARA show the process and decisions taken were driven by the risk assessment and performance in relation to the AQTF Standards.</p> | | | | |

Quality Indicator 4: Responsiveness

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| The extent to which regulatory services are responsive to clients needs and the changing needs of the national VET system | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Participation at workshops/seminars, subscriber and expressions of interest records, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003c • QMS Procedure 003d • QMS Procedure 003e • QMS Procedure 005a • QMS Procedure 006c • QMS Procedure 006d | | | | |
| Findings | | | | |
| <p>QMS procedures reflect a responsive approach to RTO needs via the Client Relationship Manager role. The full extent of responsiveness relative to regulatory services is yet to be demonstrated and may be able to be evaluated more appropriately with further delegations and RTO transfers to NARA. Participation and large attendances at workshops and information sessions facilitated by NARA and seminar sessions where NARA is presenting suggests clients are interested in the services NARA offers. NARA suggests the continued growth in their subscribers list and expressions of interest from RTOs investigating the NARA model support services implies they are responsive to the needs of the VET sector.</p> | | | | |

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Quality Indicator 5: Transparency

The extent to which registering bodies ensure that:

- RTOs are informed of their obligations as set out in the AQTF 2007 *Essential Standards for Registration*, and
- The basis for a decision affecting an RTO is clearly documented and communicated to the RTO

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

NARA website, 2007 external audit report and response, records relating to the first audit undertaken by NARA, NARA's 2008 self-assessment:

- | | | |
|----------------------|----------------------|----------------------|
| • QMS Procedure 001a | • QMS Procedure 003c | • QMS Procedure 006b |
| • QMS Procedure 003a | • QMS Procedure 003e | • QMS Procedure 006c |
| • QMS Procedure 003b | • QMS Procedure 005a | • QMS Procedure 006d |

Findings

Each RTO application is assessed using NARA's 'RTO Application Decision Tree' instrument; RTOs are informed of their risk and can challenge NARA's initial risk level.

Staff interviews identified an understanding of the need to communicate obligations and document and communicate decisions to RTOs. The QMS procedures provide opportunities for this communication and improvements have been made to these processes as a result of the review undertaken at the completion of NARA's first audit. The NARA website is a primary tool for communicating information to RTOs and included the 2007 external audit report of NARA against the standards for registering bodies. Identified opportunities for improvement and the actions taken in relation to these are also published on the website. The records from the first audit undertaken by NARA include documented information back to the RTO relative to decisions taken.

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AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES: OPERATING PROTOCOLS FOR UNDERTAKING REGISTRATION FUNCTIONS

1: National recognition

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| Each registering body accepts the registration decisions made by any other registering body. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| TVET Charter, NARA audit model, RTO records | | | | |
| Findings | | | | |
| The TVET Charter outlines the requirement that RTOs wishing to have their registration managed by NARA must first have eligibility determined by the relevant State/Territory registering body. States and Territories agreed that RTOs are not required to undergo audit on transfer which NARA's audit model reflects. NARA bases its risk management decisions on the RTO records provided by the RTO's home State/Territory registering body. | | | | |

2: Assessing applications and monitoring audits

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|--|------------------------------------|--|---|---|
| 2.1: The registering body will not grant an application for registration if it considers that the applicant's principle place of business, or all or most of its operations, will be in another state or territory. | | | | |
| Audit conclusion | Compliant <input type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input checked="" type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| NIL | | | | |
| Findings | | | | |
| In accordance with the TVET Charter and delegation instruments, the assessment of the RTO principle place of business is made by the parent State/Territory Registering Body. NARA provides this advice to new applicants and complies with the decisions made by the parent registering body. | | | | |

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AUDIT REPORT

| 2.2: Audits of RTOs and the assessment of applications for registration are against the AQTF 2007 Essential Standards for Registration. | | | | |
|--|---|--|--------------------------------------|---|
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Records relating to the first audit undertaken by NARA, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003c • QMS Procedure 006b • QMS Procedure 006c • QMS Procedure 006d | | | | |
| Findings | | | | |
| Staff interviews, QMS policies and procedures all indicate RTO audits and applications for registration are against the AQTF standards. Note: NARA will also undertake CRICOS audits under delegation arrangements; the QMS reflects these arrangements in addition to the AQTF requirements. The records of the initial audit undertaken by NARA indicate the application was audited against the requirements of the AQTF. | | | | |

| 2.3: Audits of RTOs that operate in more than one jurisdiction are managed by the RTO's registering body. | | | | |
|---|---|--|--------------------------------------|---|
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • TVET Charter • Delegation instruments • QMS Procedure 003b • QMS Procedure 003c | | | | |
| Findings | | | | |
| The TVET Charter and delegation instruments outline NARA's responsibility for managing the audit and registration of multi-jurisdictional RTOs. Scoping and conduct of audit take into account multi-jurisdictional activity. | | | | |

AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES AUDIT REPORT

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|--|---|--|--------------------------------------|---|
| 2.4: Auditors, technical advisors and audit teams meet national competency requirements agreed by the NQC. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Auditor compliance group folder, Auditor qualifications folder, records of NARA audit activity to date, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 003b • QMS Procedure 003c • QMS Procedure 006a | | | | |
| Findings | | | | |
| <p>NARA has moved to ensure all lead auditors comply with the requirements as defined by the AQTF Audit Handbook. All auditors have been asked to submit any relevant evidence which is now mapped against the requirements enabling a quick reference as to which auditors are eligible to act as lead auditors and those that can only be team auditors. Records of audit activity conducted to date confirm lead auditors/audit teams comply with the competency requirements as indicated in the AQTF Audit Handbook. (NARA has adopted a policy that all lead auditors hold the TAA qualification in addition to the formal auditing qualification in order to satisfy the audit team requirements relating to TAA and VET knowledge, and the lead auditor requirements to hold recent educational work experience). Technical advisor competencies have not been specifically addressed, as NARA has not yet required the services of technical advisors at audit, however NARA claims it has agreements in place with 10 out of 11 ISC CEOs for them to help NARA identify suitably qualified technical advisors.</p> | | | | |

| | | | | |
|--|---|--|--------------------------------------|---|
| 2.5: The decision on whether or not to : | | | | |
| <ul style="list-style-type: none"> • Register a training organisation (including decisions for applications from RTOs to amend their scope of registration or renew registration), or • Impose sanctions on an RTO, or • Cancel or suspend an RTO's registration, <p>Is made by a person or people who have not participated in the audit of that training organisation or RTO.</p> | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>Records relating to the first audit undertaken by NARA, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 002a & 002b • QMS Procedure 003e | | | | |
| Findings | | | | |

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AUDIT REPORT

Staff interviews, QMS policies and procedures all indicate NARA compliance with this operating protocol. Records of the initial audit undertaken by NARA appear to support the implementation of the QMS procedures appropriately and in accordance with this operating protocol.

2.6: Registration or extension to scope of registration is not granted until the training organisation or RTO has addressed to the satisfaction of the registering body any significant non-compliance with the AQTF *Essential Standards for Registration*.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

Records relating to the first audit undertaken by NARA, NRATC meeting agenda item (August 08), NARA's 2008 self-assessment:

- QMS Procedure 003e

Findings

The QMS procedure for managing non-compliance specifies the requirement for the RTO to address any non-compliance prior to approval. Records of the first audit undertaken by NARA indicate the RTO was found to be significantly non-compliant with the AQTF standards and that the QMS procedure was applied appropriately. The understanding and application of this operating protocol was moderated at the August NRATC meeting. All R/CABs (including NARA) have agreed that an approval will not be granted for an application in the event an RTO has an outstanding significant non-compliance, even if the non-compliance is related to a prior application.

2.7: The registering body enters all registration decisions and changes to RTO details on the NTIS in accordance with nationally agreed standards.

Audit conclusion Compliant Non-compliant Not audited Not Applicable

Evidence reviewed against the Essential Element:

NTIS records for NARA registered RTOs, NARA's 2008 self-assessment:

- QMS Procedure 002a & 002b
- QMS Procedure 002d

Findings

Staff interviews, QMS policies and procedures all indicate NARA compliance with this operating protocol. While there have been technical difficulties with RTO transfers via NTIS, NARA has worked with DEEWR to ensure all RTO information and registration decisions are recorded correctly on NTIS.

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| 2.8: Where registration is granted, the registering body provides the RTO with a registration document such as a letter or a certificate that includes: | | | | |
| <ul style="list-style-type: none"> • The full name of the legal entity that is the RTO, the registered business name(s) under which it trades, its head office address and national provider number • The scope of registration granted • The effective date of registration and the term for which registration is valid • The nationally recognised training (NRT) logo | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| RTO TRIM files, NARA's 2008 self-assessment: | | | | |
| <ul style="list-style-type: none"> • QMS Procedure 002a & 002b • QMS Procedure 002d | | | | |
| Findings | | | | |
| Staff interviews, QMS policies and procedures all indicate NARA compliance with this operating protocol. TRIM files contain copies of this information as provided to RTOs registered with NARA. | | | | |

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|---|---|--|--------------------------------------|---|
| 2.9: Where an extension to scope of registration is granted, the registering body issues the RTO with an extract of their revised registration details as entered on the NTIS. Any extension granted to an RTO's scope of registration does not extend the term of its registration. | | | | |
| <ul style="list-style-type: none"> • QMS Procedure 002a & 002b | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| RTO TRIM files, NARA's 2008 self-assessment: | | | | |
| <ul style="list-style-type: none"> • QMS Procedure 002a & 002b | | | | |
| Findings | | | | |
| Staff interviews, QMS policies and procedures all indicate NARA compliance with this operating protocol. TRIM files contain copies of this information as provided to RTOs registered with NARA. | | | | |

AQTF 2007 STANDARDS FOR STATE AND TERRITORY REGISTERING BODIES AUDIT REPORT

3: Reporting

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|---|---|--|--------------------------------------|---|
| 3.1: The performance of registration functions, including those conducted under delegation is reported in accordance with nationally agreed performance outcomes and reporting protocols. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 001c • QMS Procedure 003e | | | | |
| Findings | | | | |
| <p>NARA has not yet been in a position to report on performance of registration functions in the same manner as other registering bodies; however NARA is required to report to the NQC and States/Territories as required in the TVET Charter and State/Territory delegations. Staff interviews, QMS policies and procedures all indicate NARA's procedures for reporting comply with this operating protocol. Through the self assessment staff interviews also identified an opportunity to review and improvement the QMS procedures relating to reporting.</p> | | | | |

| | | | | |
|---|---|--|--------------------------------------|---|
| 3.2: Information on the performance of regulatory functions in accordance with the AQTF 2007 Standards for State and Territory Registering Bodies is published at least annually. | | | | |
| Audit conclusion | Compliant <input checked="" type="checkbox"/> | Non-compliant <input type="checkbox"/> | Not audited <input type="checkbox"/> | Not Applicable <input type="checkbox"/> |
| Evidence reviewed against the Essential Element: | | | | |
| <p>NARA website, NARA's 2008 self-assessment:</p> <ul style="list-style-type: none"> • QMS Procedure 001c • QMS Procedure 003a • QMS Procedure 003e | | | | |
| Findings | | | | |
| <p>Staff interviews, QMS policies and procedures all indicate NARA's procedures for reporting comply with this operating protocol. NARA has published via the website the 2007 NCVER audit report and the actions taken in response to the identified areas for improvement. (See operating protocol 3.1 for additional information relating to reporting).</p> | | | | |