

13<sup>th</sup> April 2012

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**SUBMISSION TO THE SENATE COMMITTEE**

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**Re: NATIONAL VOCATIONAL EDUCATION & TRAINING  
REGULATOR (CHARGES) BILL 2012**

Northern Melbourne Institute of TAFE (NMIT) is an entity owned by the Victorian Government. NMIT has significant offshore delivery of vocational training courses, the majority of which are in China.

This letter is to outline the perspective of a TAFE with significant transnational operations, concerned about the potential cost impact of offshore ASQA audits, when it has already taken significant steps to demonstrate leadership in quality delivery and compliance, in its operations.

Our aim is not to exempt ourselves from a potential audit but to ensure that the system used to identify "risk" does not focus too heavily on "size", but commences with desk-top audit of the systems and investment made by individual providers to ensure quality delivery offshore, directly comparable to that provided in Australia.

NMIT invests heavily in its Quality Assurance systems and training for its transnational operations, which includes our own Transnational Operations Manual (to ensure compliance and continuous improvement), internal audits (of the Transnational Operations Manual), systematic offshore validation sessions, onshore and offshore QA training, professional development (eg Certificate IV in Training and Assessment training every six months in China/HK) and effective consultation with both Australian and local industry.

Our QA processes are centralised and transparent, and we already allocate significant funds for continuous improvement and internal audits to ensure we remain the industry leader, not just in terms of size, but quality as well.

We request that ASQA be required to base their decision to undertake (and the frequency of) audit offshore on what quality processes the RTO has demonstrated are in place for the transnational operations, rather than simply focusing on the largest providers. Over-auditing will potentially confer a significant cost burden on the provider who has already made significant quality assurance investments. We would propose that ASQA prioritises audit of those providers that cannot demonstrate adequate internal Quality Assurance investment in the first instance through desk-top audit.

Yours sincerely

**Dr. Andrew Giddy**

Chief Executive Officer

Northern Melbourne Institute of TAFE