

File: CEN_15085/1

13 April 2012

Senate Economics Legislation Committee
SG.64
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Sir/Madam

National Vocational Education and Training Regulator (Charges) Bill 2012

Thank you for the opportunity to make a submission to the Senate Economics Legislation Committee on the Inquiry into the *National Vocational Education and Training Regulator (Charges) Bill 2012*.

Tasmania currently has 99 registered training organisations of which approximately 90% are classified as micro-sized business. Under the previous system, the Tasmanian Government significantly subsidised regulation costs through the Tasmanian Qualifications Authority.

Skills Tasmania has a strong focus on building and supporting the VET workforce to ensure we have a viable training industry. However, while it is anticipated that there will not be large numbers of registered training organisations (RTOs) exiting the system, intelligence gathered from the field suggest some RTOs are considering their future. Over the past three months approximately 10 RTOs registered in Tasmania have cancelled their registration. It is not known whether or not this is related to the move to Australian Skills Quality Authority (ASQA) and the increase in registration fees.

Skills Tasmania would like to make the following observations on the proposed Bill:

Part 2 – Charge for compliance audit

According to ASQA's website, the assessment process for both initial and renewal registrations includes a desk and site audit. The costs associated with the assessment starts at \$3300.

It is unclear in the Bill if the proposed charges will be additional to the assessment process or incorporated into the current fees.

There is an ambiguity regarding the wording of Section 7(a) “the costs and expenses incurred by the Regulator in conducting the audit.” Clarification is sought as to whether this includes costs associated with pre-planning work such as desktop audits or travel and accommodation.

Part 3 – Charge for the investigation of a complaint about an NVR registered training organisation

The determination of when a complaint is considered substantial should be:

- without prejudice,
- fair and valid,
- transparent.

It may be unreasonable for an RTO to pay costs associated with such an investigation within a defined period of time after the initial or renewal registration process. Such costs should be borne by ASQA as non-compliance matters should have been resolved through the registration process.

Skills Tasmania would welcome the opportunity to be consulted on the development of the charges, to ensure our providers, particularly those in regional and remote areas of Tasmania, are not disadvantaged.

Yours sincerely

Dr C A Berryman
GENERAL MANAGER (SKILLS TASMANIA)