Australian Government

Australian Skills Quality Authority

SELF-ASSURANCE CONSULTATION PAPER FEEDBACK

November 2020

WORKING TOGETHER
TOWARDS EFFECTIVE
SELF-ASSURANCE

ASQA released the [Working together towards effective self-assurance consultation paper](#) on 3 August 2020 in response to the recommendations made in the [Rapid Review of the Australian Skills Quality Authority Regulatory Practices and Processes](#) (Rapid Review). Public feedback on the consultation was open until 31 August 2020.

The information in this document outlines the feedback ASQA received through our initial consultation. This information will feed into our ongoing consultation work in this area. This information is also available to [view on the ASQA website](#).

Consultation paper approach

The consultation paper outlined a summary of phased work we are planning to shift sector practices, our expectations and our regulatory approach towards a greater focus on provider self-assurance.

Our initial focus has been on raising awareness, and building understanding and insights to help define self-assurance. Gathering and sharing examples of provider self-assurance and continuous improvement practice will further support a collective understanding.

Further steps towards effective self-assurance will include:

- Revising the Annual Declaration on Compliance to better promote and support provider self-assurance and continuous improvement culture and practices.

- Building trust, so that providers feel comfortable in sharing the ways in which they are seeking to understand their performance and the improvements they are making. Identifying and understanding common areas of improvement will be important for us in developing targeted advice and guidance to help providers build effective self-assurance culture, capability and practice.

- Sharing information about risks to enable providers to critically review their own practice in these areas and make any necessary improvements.
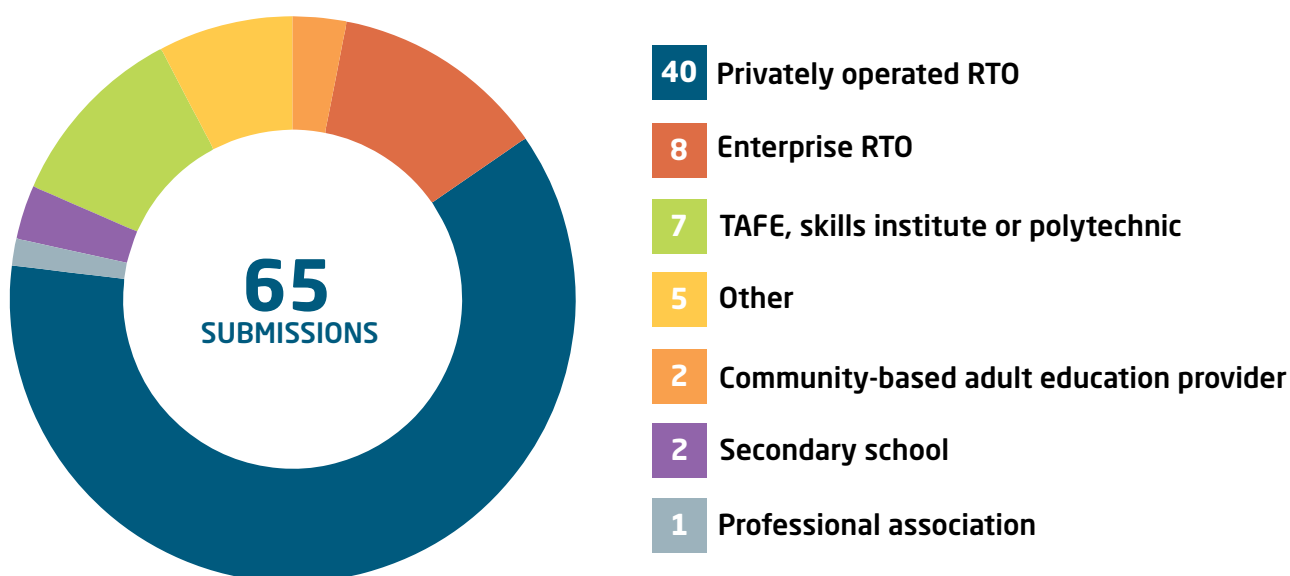
The anticipated outcome of these actions is that providers are put in a better position to develop effective self-assurance systems for identifying risks to quality outcomes and fixing problems as they arise. Stronger assurance and oversight of their own performance will enable providers to continuously improve vocational education and training practices and deliver quality outcomes for students and employers.

As a self-assurance mindset is embedded in a provider's culture and systems, ASQA can have greater confidence that the provider has demonstrated the capacity and motivation to manage risks and continuously improve. This will inform the nature and frequency of our compliance monitoring and support us to focus on areas and providers of greatest risk.

Contributor overview

We received a total of 65 submissions. The pie chart below shows how many submissions we received in each stakeholder category.

Self-assurance consultation paper contributors by stakeholder type

65 SUBMISSIONS

40	**Privately operated RTO**
8	**Enterprise RTO**
7	**TAFE, skills institute or polytechnic**
5	**Other**
2	**Community-based adult education provider**
2	**Secondary school**
1	**Professional association**

What we heard

The consultation paper posed three questions to gather feedback on our move towards an increased focus on provider self-assurance in the coming years. Summaries of the feedback provided for each question are provided below.

Question 1: In order to increase the focus on effective self-assurance, what actions or outcomes do you think should be included in the short, medium and long-term?

Responses to this question reinforced the need for ASQA to provide more information on the concept of self-assurance. There was also a clear call for examples, guidance and tools to support providers in developing their understanding and capability in this area.

Longer-term, submissions indicated a desire for ASQA to recognise good practice and differentiate our regulatory treatment for providers effectively self-assuring, and for ASQA to consider how compliance with other regulatory regimes could be used to support monitoring providers' performance. There was also some suggestion that there should be stronger governance and accountability requirements for positions of influence within providers.

Question 2: Can you provide examples of how providers already employ effective self-assurance mechanisms, to help build the capability of the sector?

Overwhelmingly, respondents reported a program of internal audits and/or self-assessments, and continuous improvement registers or plans as self-assurance mechanisms. The exception to this was that smaller-sized organisations (less than 100 students) reported being more likely to employ outside support (e.g. external auditing organisations) to conduct internal audits or self-assessments.

Other more frequently used mechanisms included:

1. governance boards or education committees to oversee multiple regulatory requirements (e.g. standards and industry, government or financial requirements) and dedicated compliance staff or working groups to monitor performance and compliance with regulatory requirements

2. ensuring learner and industry needs are met through:

   - feedback from students, staff and industry (including quality indicator surveys)

   - involving industry in the design, implementation and review of programs

   - regular analysis of data (progress, completion, complaints)

   - focusing on the needs of industry and beyond compliance with standards

   - providing specialist support for diverse student needs.

3. pre- and post-course validation and moderation activities, involving a range of internal and external stakeholders and, at times, across sites

4. networks to share information and resources, to ensure staff develop capability and understand compliance requirements, and to maintain staff currency

5. internal and ongoing professional development to develop capability and maintain currency.

Analysis of responses suggests that while providers use a myriad of mechanisms to self-assure, there was limited distinction between the types of mechanisms used by providers based on size.

Question 3: How could the annual RTO declaration be improved to build provider self-assurance capability? Suggestions may include ways to critically reflect on practice or identifying other ways to improve.

There were two distinct approaches suggested for improvements to the Annual Declaration on Compliance:

1. To require providers to account for how they are self-assuring and actions taken to respond to deficiencies identified.
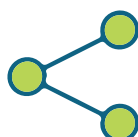
2. To collect and share examples of good practice in self-assurance and continuous improvement, particularly beyond the requirement of the standards.

There were also suggestions to refine the number of questions asked with a focus on specific parts of the student journey, broader risks or indicators of self-assurance.

There were mixed views about the frequency of completion—some wanted more often, while others sought it to be undertaken less often. Additionally, changes were suggested to functionality of the online annual declaration form to enable it to be completed over time and by more than one person. Guidance to support completion of the declaration was also suggested, as was the idea of independent external sign-off.

Next steps in working together towards effective self-assurance

The information we have gathered through the self-assurance consultation paper process will be used to drive further discussion and consultation with stakeholders towards creating a shared understanding of requirements.

In response to the call for more information on self-assurance, ASQA will work with a subgroup of the Stakeholder Liaison Group (SLG) and peak provider representative bodies to understand how to build better understanding and capability in this area. ASQA will also work with providers to develop self-assurance examples and case studies for sharing.

If you would like to contribute an example or case study for sharing, you can submit via the form on ASQA's Consultation on self-assurance webpage.

In revising the Annual Declaration on Compliance for 2021, ASQA will consider the consultation feedback, findings and recommendations of the Rapid Review and the practice of other regulatory agencies. ASQA will also work with the SLG and peak provider representative bodies to test thinking and the implementation of revisions.

Contact us

If you have a question or comment on this initial self-assurance consultation feedback, please contact our Info Line by email at enquiries@asqa.gov.au or phone 1300 701 801 (dial +61 3 8613 3910 from outside Australia). The Info Line is open 9am to 7pm (AEDT) Monday to Friday.