

Department of Education and Training

STATEMENT OF EXPECTATIONS EVALUATION REPORT: Victorian Registration and Qualifications Authority 2018-2019

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1. ABOUT THIS EVALUATION

Evaluation is more than just measuring whether stated improvements and targets have been delivered. Evaluations will enhance the process for selecting improvements and targets, and improve our understanding of regulatory practices and how efficient and effective different approaches are in achieving defined outcomes.

Department of Treasury and Finance (2018), *Guidelines for Evaluation of Statements of Expectations for Regulators*

This report is an evaluation of the Victorian Registration and Qualifications Authority (VRQA) Statement of Expectations (SOE) issued by the Minister for Education and the Minister for Training and Skills (Ministers) on 9 January 2018. The new *Statement of Expectations Framework for Regulators* (SOE Framework) introduced in July 2017 requires departments to evaluate both the regulator outcomes from the SOE (the 'outcome evaluation') and the process to develop and refine the SOEs (the 'process evaluation').

In accordance with these guidelines, the focus of this report is limited to those regulatory activities specified in the VRQA SOE Letter and is not an evaluation of the full scope of the VRQA's regulatory functions. The regulatory areas that are the focus of this evaluation are: home schooling; child safe standards in schools; expulsions reform; and, apprenticeships and traineeships.

This is the first evaluation under the new SOE Framework and as such, the Department of Education and Training Victoria (DET) took a 'baseline' approach by reviewing publicly available performance data. Although it is too early to measure the impact of the SOE on VRQA performance, analysis of baseline findings suggests that the VRQA is generally performing well in these areas with respect to Ministerial expectations outlined in the SOE, particularly home schooling. The findings also identify opportunities for continued improvement, specifically with apprenticeships and traineeships, and child safe standards in schools which is also subject to an audit by the Victorian Auditor-General's Office (VAGO).

PURPOSE OF THE SOE EVALUATION (OUTCOME AND PROCESS)

The SOE Framework seeks to promote greater efficiency and effectiveness in the administration and enforcement of regulation in the context of facilitating increased business investment and economic activity in Victoria. It aims to improve regulator performance, is an important pillar of the Government's regulation reform program, and is an integral part of the cultural shift across Victorian regulators towards continuous improvement.

The SOE establishes expectations of regulator performance through a letter sent by the relevant Ministers to the regulator (the SOE letter) with the objective of improving regulator outcomes and reducing costs on regulated parties. Inefficient administration and enforcement of regulation can be as burdensome as poorly designed regulation and the performance expectations of SOEs keep regulatory improvement a top priority.

The purpose of the evaluation of regulator outcomes is to assist the regulator to identify opportunities and develop plans to:

- improve regulator performance
- improve regulator outcomes
- reduce costs on regulated parties.

SCOPE OF THE EVALUATION

This report evaluates whether the improvements and targets outlined in the Ministers' SOE letter to the VRQA have led to greater efficiency and effectiveness in the regulator's activities of administering and enforcing its regulations (the 'outcomes evaluation'), and whether there is scope for improvement in the processes used to develop and refine the SOE processes (the 'process evaluation').

This report is intended for the Minister for Education and the Minister for Training and Skills and Higher Education. Information included in this report will be of interest to the VRQA, its clients and stakeholders, and other interested members of the public.

As part of DTF's SOE Framework, the Commissioner for Better Regulation will review this evaluation report along with the SOE evaluations of other regulators from across the Victorian Government. The focus of this review will be on the rigour of analysis and presentation of the evaluation rather than the findings of the evaluation. The SOE Framework and evaluation reports will be discussed at the Commissioner's annual regulator performance improvement forum (DTF, 2018b).

The SOE evaluation represents a new and additional phase of the SOE process. The evaluation is intended to be conducted prior to the expiry of SOE (DTF, 2018b; p. 8) and as such covers only the first 12 months of the 18-month SOE cycle. This is the first evaluation under the new SOE Framework and, along with the timing issues, there are a number of limitations to this evaluation. Please refer to page 12 of this report for more information on these limitations.

THE VRQA SOE 2018-19

The SOE for 2018-19 for the VRQA was issued jointly on 9 January 2018 by the Hon James Merlino MP, Minister of Education, and the Hon Jenny Mikakos MP, Acting Minister for Training and Skills. The VRQA Board responded to the SOE and outlined how the VRQA intends to meet its expectations over the period with implementation to follow. The VRQA Board issued its response to the SOE letter in February and published it in March 2018. The current SOE letter expires on 30 June 2019, making it an 18-month cycle in line with the transitional arrangements under the new SOE Framework. Future SOE cycles will cover the full 2-year period in accordance with the requirements in the SOE Framework.

ABOUT THE VRQA

The VRQA is established under the *Education and Training Reform Act 2006* (the Act) and is responsible to the Minister for Education, the Minister for Training and Skills, and the Minister for Jobs, Innovation and Trade. The VRQA is governed by an independent board and applies the *Education and Training Reform Regulations 2017* (ETR Regulations 2017). Its purpose is to regulate for quality learning outcomes in safe and well-governed environments.

The VRQA registers:

- vocational education and training (VET) providers that deliver accredited training to domestic students in Victoria only, or in Victoria and Western Australia only

- school education providers, including approval on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) for courses delivered by schools
- senior secondary education providers (both school and non-school providers) including approval on CRICOS for school sector courses
- children for home schooling in Victoria.

The VRQA also:

- regulates apprenticeships and traineeships (A&T) in Victoria
- monitors group training organisations (GTOs) in Victoria
- approves school and non-school providers as overseas secondary student exchange organisations
- accredits courses and register qualifications for our registered providers and Victorian senior secondary courses and qualifications
- investigates complaints against registered providers and maintains a register of all education and registered training organisations along with the accredited courses they deliver.

The VRQA plays an important role in ensuring organisations and individuals who deliver education and training in Victoria generate positive experiences and equip participants with the skills they need to succeed in the economy and society. In 2017-18, the VRQA regulated 2,262 schools across all sectors that served 971,669 students; regulated 219 independent schools (10% of all schools); as at 30 June 2018 registered 5,333 home schooling students from 3,214 households; regulated 228 Registered Training Organisations (RTOs) that were not registered by the Australian Skills Quality Authority (ASQA); and monitored almost 38,000 training contracts (VRQA, 2018a; DET, 2018b). In 2017-18, the VRQA undertook its regulatory obligations with a budget of \$13 million and staff of 59.2 FTE.

RELEVANT CONTACTS

Table 1: Relevant contacts involved in the evaluation of the VRQA SOE.

Contact	Area of Involvement
Secondary Schooling, Pathways and Tertiary Education Reform Division, Policy, Strategy and Performance Group, DET	The team within the department responsible for conducting the evaluation.
Governance and Corporate Services Division, VRQA	The team(s) within the regulator responsible for collecting the data and information on each improvement/target to inform the evaluation.

2. KEY FINDINGS

OUTCOME EVALUATION

The outcome evaluation in this report is designed to establish baselines for assessing the VRQA's performance against its SOE—with the goal of achieving greater efficiency and effectiveness in the administration and enforcement of regulation and informing future SOEs. The key findings section is drafted to address the relevant elements in the Good Regulatory Practice Framework. This grouping provides greater oversight of VRQA's performance in relation to its regulatory activities and facilitates alignment of future SOEs with relevant aspects of good regulatory practice.

Compliance related assistance and advice

The VRQA undertook SOE related activities that sought to improve compliance related assistance and advice in the areas of home schooling regulation, child safe standards (CSS), and expulsions reform.

Home schooling

The VRQA invested significant resources in order to implement the home schooling regulatory changes in the ETR Regulations 2017. Baseline data suggests that the advice and assistance provided has been effective in ensuring a smooth transition to the new requirements in an environment of increasing interest in home schooling. Increasing parents' understanding of learning areas and learning plans could yield further improvements as 24% of applicants found that preparing a learning plan was difficult. Additionally, there may be opportunities to provide further advice and assistance to reduce parental anxiety during home schooling reviews.

Child safe standards

The VRQA has continued to provide general advice and assistance, including substantial online resources, to assist educational organisations to embed the CSS. For Victorian schools this is consistent with the requirements of Ministerial Order No. 870. The VRQA undertook substantial stakeholder engagement and consultation to develop and deliver this advice and assistance. More recent activity involving the monitoring and enforcing of the standards has identified incidences of non-compliance with the CSS in all sectors. While many schools recognise the need for more specific guidance from the regulator, more will also need to be done to ensure greater compliance with the standards. Consequently, the CSS should remain a focus of future SOEs.

Expulsions reform

The VRQA fulfilled the Ministers' expectations to align guidance on expulsion policies and procedures for government schools by updating the *Guidelines to the Minimum Standards and Requirements for School Registration*. The new guidelines commenced on 1 January 2019 and require government schools to demonstrate compliance with Ministerial Order No. 1125—Procedures for Suspension and Expulsion of Students in Government Schools. The VRQA engaged with DET throughout this process. Given the VRQA's limited ongoing role in this area, future SOEs could consider whether expulsions reform should remain a priority area for the SOE.

Timeliness

Home schooling

The VRQA implemented home schooling changes efficiently by establishing business systems, data collection and analysis processes, alongside modifying application and review systems and processes. The VRQA is meeting its regulatory obligation to notify home schooling applicants of its

decision to register a child for home schooling, currently averaging 6 days from receipt of a complete application, well within the 28 days required under the ETR Regulations.¹

Feedback contained in the 2018 VRQA Client and Stakeholder Research suggests that there may be room for improvement in the processes around home schooling reviews, namely response times and lodgement processes. Overall the research showed a high level of satisfaction amongst home schooling parents with respect to their interactions with the regulator.

Having developed baseline measures under this SOE, there is an opportunity for future SOEs to explore opportunities for the VRQA to build on the strong base on home schooling data to identify non-compliance risks. This would support the primary objective of regulating home schooling to ensure that all school-aged children in Victoria have access to quality education (DET, 2017; p. 27).

Risk-based strategy

Apprenticeship and Traineeship

The VRQA continues to develop risk-based capabilities and approaches with respect to regulating A&T in Victoria. A new contract for regulatory field services with a greater focus on early identification of non-compliance risk has been implemented, and the VRQA continues to work towards delivering a new A&T management system despite delays and changes resulting from Commonwealth decisions. The A&T sector is large and complex and there remains evidence of high contract attrition. There is a continuing need for parties to understand their training contract obligations. A&Ts should remain a focus of future SOEs.

Stakeholder consultation and engagement

Home schooling

The VRQA has continued to work closely with DET to implement the changes to home schooling regulation and has participated in the Victorian Home Education Advisory Committee (VHEAC) as expected under the SOE. The VRQA has worked closely with DET on home schooling and participates in monthly meetings. Home schooling is now included in the VRQA's annual Client and Stakeholder Research.

Apprenticeship and Traineeships

Analysis of the VRQA 2018 Client and Stakeholder Research suggests there are opportunities for the VRQA to raise stakeholder awareness and understanding of its role, and improve the accessibility of compliance related assistance and advice to the A&T sector. Future SOEs could focus on enhancing communication activities with respect to role clarity and compliance advice.

PROCESS EVALUATION

The process evaluation sought to answer questions from those recommended in the *Guidelines for preparing Ministerial Statements of Expectations under the SOE Framework May 2017* (DTF Guidelines) (DTF 2018, pp. 5 and 11). Specifically, whether the process used to develop the SOE letter and the SOE evaluation was appropriate, and whether the regulator delivered improvements and targets set out in the SOE letter and its response.

Overall, the process evaluation found that DET and VRQA had followed the processes outlined in the SOE Framework and; this was appropriately applied to the SOE letter and evaluation. However, difficulties were experienced in integrating the SOE Framework timeframes to the

¹ The wording of this metric was changed in February 2018 from "the number of days taken to assess each complete application" to "The number of days taken to notify parents that an application is complete".

governance timelines of DET and VRQA. These issues should improve with greater familiarity with SOE requirements and a regular 2-year cycle of SOEs.

The inclusion of general aspirations within the SOE letter created challenges in planning for the evaluation, including providing a line of sight between the Good Regulatory Practice Framework, Ministerial expectations, VRQA SOE Board response activities, outcomes and measures. In order to facilitate future SOE evaluations and ensure greater alignment to the SOE Framework, future expectations could be grouped according to the Good Regulatory Practice Framework and framed in terms of outcomes with measurable performance targets where appropriate. Further integration of the SOE process within VRQA strategic planning and risk management processes would help streamline the development of future SOEs.

THE REPORT STRUCTURE

The remainder of the report is structured in two parts; the outcome and process evaluations. The approach to the outcome evaluation is explained prior to the evaluation, and is broken down by area of regulatory responsibility and improvement activities within those areas as defined by the Good Regulatory Practice Framework. The process evaluation follows and is confined to a single chapter.

The report structure is as follows:

- Chapter 3 – Approach to the outcome evaluation
- Chapter 4 – Home schooling outcome evaluation
- Chapter 5 – Child Safe Standards in Schools outcome evaluation
- Chapter 6 – Expulsions reform outcome evaluation
- Chapter 7 – Apprenticeship and Traineeship outcome evaluation
- Chapter 8 – Process evaluation

3. APPROACH TO THE OUTCOME EVALUATION

As noted, the SOE Framework requires an outcome evaluation to assess whether the improvements and targets outlined in the Ministers' SOE letter have led to greater efficiency and effectiveness in the regulator's activities of administering and enforcing its regulations. At a minimum, the outcome evaluation should:

- assess how well the regulator performed against its intended outcomes
- identify any key risks or barriers experienced by the regulator impacting its performance
- outline the key lessons applicable for the future.

The findings of this evaluation are expected to inform future SOEs. The next iteration of the VRQA SOE will be valid from 1 July 2019 to 30 June 2021.

METHOD

The outcome evaluation sought to answer the following question, adapted from the DTF Guidelines (DTF 2018, pp. 5 and 11):

1. *What difference did the SOE make towards achieving greater efficiency and effectiveness in the administration and enforcement of regulation?*

The SOE Framework has nine elements of good regulatory practice (shown in Figure 1) which aims to:

- improve regulator performance
- improve regulator outcomes
- reduce costs on regulated parties.

Over time it is proposed that a focus on these elements will, in turn, improve the efficiency and effectiveness of the regulator's administration and enforcement of regulation.

The first step in the outcome evaluation was for DET to map the improvements and targets stated in the VRQA SOE letter and the VRQA's corresponding response and activities to the nine elements of Good Regulatory Practice Framework. The four elements deemed relevant to the VRQA SOE 2018-2019 are summarised in Table 2 along with a description of the role they play in improving the efficiency and effectiveness or regulatory administration and enforcement under the SOE Framework (DTF, 2018a).

Figure 1: Good Regulatory Practice

GOOD REGULATORY PRACTICE FRAMEWORK

These nine elements are the lens through which a regulator assesses itself and the framework for developing continuous improvement activities and targets in the SOE.

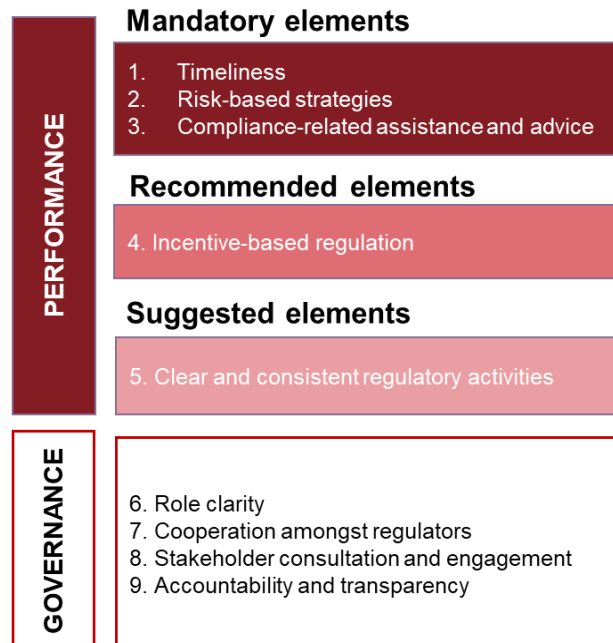


Table 2: Elements of Good Regulatory Practice

Elements of Good Regulatory Practice	Importance of the element for efficiency and effective administration and enforcement of regulation.
Compliance-related assistance and advice (Mandatory)	Effective assistance and advice reduces the risk of non-compliance. Poor and inaccessible advice may increase time spent by regulated parties to understand regulatory requirements.
Timeliness (Mandatory)	Regulatory costs can often arise from issues around the timeliness of approval processes, unanticipated delays and coordination problems in administrative decision, rather than regulatory design.
Risk-based strategy (Mandatory)	Failure to apply risk-based approaches may result in inappropriate priority setting and inefficient allocation of resources.
Stakeholder consultation and engagement	Effective communication and engagement with stakeholders can reduce regulatory burden, facilitate improved regulator performance, and leader to better regulatory outcomes through information sharing and improved responsiveness.

Source: adapted from the SOE Framework (DTF, 2018a; pp. 6-10).

This report is structured using this framework to provide a more useful program logic with a clear line-of-sight between the Good Regulatory Practice Framework, SOE, VRQA activities, logical outcomes (explicit and implicit in the SOE) and available measures.

As this is the first evaluation under the new framework, the objective is to establish baseline metrics rather than determine causality between the SOE, SOE activities, and outcomes. Consequently, this report has refrained from making significant recommendations. Future evaluations would aim to make recommendations based on a better understanding of the drivers of improvement and performance targets and pre-post comparisons.

Scope

The Ministers' expectations in the VRQA SOE 2018-19 had a focus on the following areas of regulatory activity:

- Home schooling
- Expulsions reform
- Child Safe Standards in Schools
- Apprenticeships and traineeships.

Other VRQA functions are out of scope for this evaluation cycle, including international students, student exchanges and VET course accreditation.

Opportunities to evaluate other regulatory areas will be considered during the VRQA's self-assessment, as part of the development of the VRQA SOE of 2019–2021, and through future SOE cycles.

Data collection

The evaluation was developed with the proportionality principle in mind, ensuring that it did not absorb a disproportionate amount of time and resourcing and could be undertaken with available

DET and VRQA resourcing (DTF 2018b, p. 7). Consistent with this approach, this evaluation report drew on the following sources (mainly publicly available or pre-existing):

- VRQA, Acquittal against the VRQA SOE 2018-19 (see **Attachment 1**)
- VRQA, Annual Report (2016/17)
- VRQA, Annual Report (2017/18)
- VRQA, Home Schooling Quarterly Reports
- VRQA, Client and Stakeholder Research 2017
- VRQA, Client and Stakeholder Research 2018 (excerpts)²
- Consultation with DET staff
- Consultation with VRQA officers, VRQA Board members, and the VRQA Audit and Risk Management Committee (ARMC)
- Other information provided by VRQA Board (e.g. non-published VRQA Board reports).

The measures identified in these reports and data sources were mapped back to the outcomes in the VRQA SOE letter (2018-19). DET consulted with the VRQA during this mapping exercise to ensure its findings were valid.

Limitations

There are a number of limitations when interpreting the findings from DET's evaluation of the VRQA's activities and outcomes against its SOE letter.

Timing – only 12 months of an 18 month cycle has been evaluated

This evaluation only covers 12 months (January to December 2018) of the 18-month SOE cycle (January 2018 to June 2019). This evaluation of the VRQA SOE 2018-19 was undertaken 6 months before its expiry (30 June 2019) in order to inform the next iteration of the SOE, as per the SOE Framework and DTF Guidelines. Note that the duration of future SOEs will be 2 years, now that the transitional arrangement for Tranche 1 regulators like the VRQA, has finished.

Availability of fit-for-purpose data is limited

This evaluation utilises quantitative data where appropriate and available. Consistent with DTF SOE Evaluation Guidelines, suitable proxy data is used where no specific measures are available.

One output of this report is to facilitate discussions regarding future metrics that are fit-for-purpose for the SOE process.

Expectations in the SOE letter are focused on process improvements

The VRQA SOE letter has a stronger focus on process improvements relative to performance related outcomes and targets. This letter sought to achieve outcomes such as a reduction in non-compliance, improved understanding of regulatory requirements, and improved application times. While explicit, these outputs were not framed as measurable outcomes or performance objectives. Consequently, it is difficult to make a definitive assessment of the VRQA's performance against some of these elements and caution should be used if drawing inferences on outcomes based on the data used in this report.

² Full report from the 2018 VRQA Client and Stakeholder Research was not available at the time of drafting this report.

Related initiatives

At the time of drafting this report, VAGO was undertaking an audit on *School Compliance with Victoria's Child Safe Standards*. The objective of this audit was to determine whether the systems and support that oversee Victoria's CSS assure school compliance.

This audit considered:

- the adequacy of VRQA's school registration framework to ensure school compliance with the CSS
- VRQA's monitoring, review and assurance activities of all schools, including the effectiveness of its arrangements with approved review bodies—including DET and the Catholic Education Commission of Victoria (CECV).
- how the VRQA engages with DET to keep the Ministers informed on school's compliance with the CSS.
- how DET evaluates the VRQA's performance against the CSS related measures in its SOE.

The audit scope has not included individual schools but as part of its audit plan, VAGO is intending to survey all school governing authorities to seek their views on their awareness of the CSS and their requirements for compliance and risks of non-compliance (VAGO, 2018).

The DTF Guideline to the SOE evaluation encourages departments to integrate the evaluation process into existing reporting cycles and processes such as the VAGO audit (DTF 2018b, p. 8). DET met with VAGO in late 2018 to discuss the plan for the VRQA SOE evaluation. Given the powers and scope of the VAGO audit, it is expected that the audit findings will be more comprehensive than this evaluation, and will be an input into future SOEs, including the next SOE letter to the VRQA for the 2019-2021 period. The findings from the VAGO audit will not be considered in this report due to the timing of VAGO's final report.

4. HOME SCHOOLING OUTCOME EVALUATION

As part of the ETR Regulations 2017, changes were made to the registration process of children for home schooling. The Minister's SOE letter for 2018-19 to the VRQA included a number of expectations regarding the implementation of these changes as outlined in the ETR Regulations 2017, including the development of a number of metrics. Further background information and the baseline data tables relating to home schooling can be found in **attachment 2**.

COMPLIANCE RELATED ASSISTANCE AND ADVICE

The VRQA Board has attested that the VRQA has acquitted all of the activities outlined in the VRQA Board Response relating to compliance related assistance and advice in the area of home schooling.

Table 3: Summary of expectations for Compliance related assistance and advice (home schooling)

Relevant expectations	SOE Response (actions)	Acquitted
Expand resources to support home schooling families understand and navigate the new regulatory arrangements to enhance compliance	• Develop and launch a new and dynamic website	✓
	• Publish a newsletter to education stakeholders and the home schooling community	✓
	• Collect and analyse data on home schooling customer enquiries: web analytics and phone and email enquiries.	✓
	• Establish the Home Schooling unit	✓
	• Establish Board subcommittee to oversee home schooling internal reviews	✓
	• Establish a pool to of expertise to assess applications	✓
Legend:	✓ - action has been completed	

Key outputs

Compliance related information and advice on the new regulatory requirements for home schooling in the first 12 months of the SOE provided by the VRQA included:

- establishing the Home Schooling Unit.
- establishing the VRQA Board Home Schooling Review subcommittee to consider reviews for rejected applications. To date there have been no reviews.
- expanding the home education web presence from a single page to 24 pages, including a dedicated home schooling page. By 30 June 2018, the VRQA had developed and published 20 resources (including videos) on home schooling and a library covering the 8 learning areas.
- publishing 4 editions of the *Education@Home* newsletter, the most recent edition was sent to 3,441 families on 4 December 2018.

- collecting and reviewing data on customer enquiries, noting that further work is required for phone and email enquiries.
- holding 3 information sessions during 2018 on the new review process and general registration, which attracted a total of approximately 80 attendees. Two of these sessions were live-streamed and subsequently posted to the VRQA website. These recordings of the new review process (uploaded 21 June 2018) and general registration (26 October 2018) had 530 and 425 viewers respectively as at December 2018.
- overseeing home schooling policy through the VRQA Board's Compliance and Quality subcommittee, which contributes to ongoing internal moderation ensuring consistency of home schooling assessment and refinement of assessment processes.
- hosting 13 roadshow sessions along with representatives from the Victorian Home Education Advisory Committee (VHEAC), to help families prepare for the new regulations. These sessions received more than 1,100 attendees with another 200 participating through webcast sessions.

Key findings from baseline data

An analysis of the baseline data revealed that:

- an increasing number of children were registered for home schooling in Victoria, up by 11% from 4,785 children registered in 2016-17 to 5,333 in 2017-18.
- the number of households participating in home schooling increased by 7% from 3,014 to 3,214 households over the same period. According to the VRQA, population growth and the new regulations were contributing factors.
- the VRQA approved around 94% of home schooling applications it received. Unsuccessful applications were generally those unable to demonstrate that the key learning areas outlined in the regulations were addressed in the learning plan or failed to include required information.
- the VRQA approved around 89% of applications that sought an exemption from one or more of the key learning areas. A number of applications were withdrawn because the application misunderstood requirements. Applications that sought an exemption mostly cited special learnings needs as the primary reason. Some exemptions were granted because the learning areas were unrelated to the child's future study or career goals (VRQA 2018a, p. 18).
- by the end of Q3 2018, there had been 157 home schooling reviews. The VRQA SOE letter sets a target of 10% of randomly selected home schooling families to be reviewed each year. By Q3 2018, the VRQA had reviewed approximately 5% of families. Most of the reviews were scheduled in October (Quarter 4) and the VRQA expects to meet the target by the end of January 2019.³
- the VRQA has advised that most (53%) home schooling reviews were undertaken by desktop submission, followed by telephone (27%), and location visit (20%).⁴ There were no cancellations of home schooling registration resulting from these reviews, demonstrating compliance to the requirements of registration.

³ The VRQA has advised that by October 2018, this figure had grown to 242 reviews, 104 undertaken by desktop review.

⁴ Parents select the review method that best suits their circumstances explaining the fluctuations in number of reviews throughout the first 3 quarters. Most choice later in 2018 (particularly October).

- since being notified of selection for review, 54 parents have contacted the VRQA to cancel their child's registration because the child is now enrolled in mainstream schooling or currently resides outside of Victoria.

Although it is too early to determine the full impact of these initiatives, these metrics suggest that the VRQA has provided effective compliance related assistance and advice to help home schooling families understand and navigate the new regulatory environment. Early data indicates a high level of compliance.

Approximately 9 in 10 home schooling applications were successfully registered, but only 4 in 5 applications complied with the requirements to provide learning plans upon initial application. This suggests that future actions could aim to improve the knowledge of home schooling applicants of their requirements, particularly with respect to learning plans, in order to reduce the number incomplete applications that require follow up.

Qualitative data from the VRQA 2018 Client and Stakeholder Research provided in January 2019 suggest that:

- parents desire greater access to more detailed information that would enable them to deliver a quality education to their children, and might be willing to provide more information to ensure teaching capability.
- parents desire faster response to their review, including information about milestones in the notification process post-review and the electronic lodgement of information.
- parents desire a greater understanding of what is involved in a review.

TIMELINESS

The VRQA Board attested that the VRQA is on track with the relevant expectations related to the improvements of timeliness in the administration and enforcement of home schooling regulation. The one incomplete expectation relates to the ongoing implementation of a new computer records system (see discussion below).

Table 4: Summary of expectations for Timeliness (home schooling)

Expectations	SOE Response (actions)	Acquitted
<p>Implement the home schooling changes as efficiently as possible, and move relevant business systems and processes online as soon as practicable</p> <p>Design processes so that applications are assess as efficiently as possible; collect data on the time it takes to assess applications and provide this data to DET quarterly</p> <p>As assessment becomes well established in the VRQA, increase the number of applications that take less than 28 days</p> <p>Develop targets for application assessment times and performance metrics to measure improvements in application assessment times and sector compliance, collect data on those metrics, and provide to DET quarterly.</p>	<ul style="list-style-type: none"> Engage with specialists supports and advisory bodies and modify systems and processes as appropriate 	✓
	<ul style="list-style-type: none"> Seek feedback from home schooling parents on the review process 	✓
	<ul style="list-style-type: none"> Implement a new computer records management system 	On track
	<ul style="list-style-type: none"> Finalise business requirements for expanded online business systems 	✓
	<ul style="list-style-type: none"> Develop targets, collect data, and provide quarterly reports⁵ Monitor and review application assessment timelines 	✓
	<ul style="list-style-type: none"> Establish a pool of expertise to assess applications 	✓
	<ul style="list-style-type: none"> Report on assessment timelines 	✓
<p>Legend:</p>	<p>✓ - action has been completed</p> <p>× - action is incomplete (overdue or not yet started)</p>	

Source: Attachment 1

Key Outputs

The VRQA established new systems and processes to administer the new home schooling regulations. This included upgrading the home schooling customer relationship management (CRM) to accommodate the more detailed regulatory regime that included learning plans, exemptions and annual reviews. The VRQA published 3 quarterly home schooling reports, including assessment timelines, in the period of evaluation.⁶

Key findings from baseline data

The analysis of baseline home schooling data revealed that:

- Approximately 28% of applications on average (slightly more than 1 in 5) do not comply with the application requirements in the ETR Regulations 2017 and are deemed incomplete upon initial assessments. This means the VRQA must seek further information from the applicant, delaying the application process accordingly.

⁵ In February 2018, the wording of the metric "the number of days taken to assess each complete applications" was changed to "the number of days taken to notify parents that an application is complete" for consistency.

⁶ The VRQA assessment process for home schooling is determined by the ETR Regulations. Notice of decisions regarding registration for home schooling must 'be given within 28 days after the Authority receives an application in accordance with Regulation 72' [74(2)(c)]. The VRQA must undertake an assessment of the application to determine whether it complies with section 72 (specifically 72(5)). If it does not, then the VRQA notifies the applicant who is given 2 weeks to provide further information, after which the application is assessed a second time. If the application does comply with section 72 the child is eligible to be registered for home schooling and the applicant is notified accordingly.

- The average number of days taken to notify a parent that their home schooling application is incomplete is 6 days, although these results vary from quarter to quarter (for example, in Quarter 2 the VRQA reported that 45% were notified in 7 days or less, by Quarter 3 this was 97%).
- It takes on average 6 days for the VRQA to notify parents that an application is complete. A complete application is an application that is assessed as meeting all requirements outlined in Regulation 72(5).⁷ This can range from under a day to 17 days, with significant variation between quarters (in Quarter 2, 62% notified in less than 7 days; in Quarter 3 it was 98%). This metric replaces the metric for “the number of days taken to assess each complete application” and includes both the time taken to assess a home schooling application and to notify the parent of the outcome their application.

Part 6, Division 1, Section 72 (5) of the ETR Regulations 2017 states that an application to register a student for home schooling must –

- (a) Be in the form approved by the Authority; and
- (b) Be signed by the parent who will be responsible for the home schooling of the student; and
- (c) Include or be accompanied by-
 - (i) Evidence of the student’s full name and date of birth; and
 - (ii) A proposed education program comprising a learning plan that specifies when and where instruction will take place, and the subject matter that will be covered by the instruction during the first year of registration; and
 - (iii) Details of the education materials and resources to be used in the instruction, including how the student’s learning outcomes will be recorded.

Source: Education and Training Reform Regulations 2017

The VRQA is comfortably meeting the requirement of Regulation 74 to notify a home schooling applicant of the outcome of their application within 28 days of receipt of a complete application.

⁷ The VRQA uses the term ‘complete’ in regards to an application that meets requirements and is therefore eligible for registration. The notification of the complete status occurs when registration is issued; however, the term complete is not a “finalisation” of VRQA processes.

STAKEHOLDER CONSULTATION AND ENGAGEMENT

The VRQA Board attested that the VRQA met all stakeholder consultation and engagement expectations.

Table 5: Summary of expectations for stakeholder consultation and engagement (home schooling)

Expectations	SOE Response (actions)	Acquitted
Continue to work closely with DET in implementation, participate on the VHEAC and actively consider feedback provided by the home schooling members of the VHEAC. Generally, continue to engage with stakeholders to inform improvements of regulatory activity	<ul style="list-style-type: none"> Include Home schooling in the annual VRQA stakeholder and client research 	✓
	<ul style="list-style-type: none"> Collect feedback from home schooling parents through targeted activities, such as following roadshows, newsletter requests, etc. 	✓
	<ul style="list-style-type: none"> Participate in VHEAC 	✓
	<ul style="list-style-type: none"> Actively consider VHEAC feedback 	✓
	<ul style="list-style-type: none"> Provide advice to DET on Guide to Home Education in Victoria 	✓
Legend: ✓ - action has been completed		

Source: Attachment 1

Key Outputs

The VRQA:

- included the home schooling sector in its annual Client and Stakeholder Research in 2018,
- is a member of the VHEAC and participated in all 4 meetings held in 2018,
- has had regular engagement and shared information through monthly meetings with relevant DET areas.

The VRQA advised that it also:

- met with the Distance Education Centre Victoria,
- developed an effective relationship with the Home Educators' Network.

The home schooling sector attended the Annual Stakeholder Breakfast on the 4 May 2018 for the first time.

The Ministers' SOE letter and the VRQA Board proposed actions do not specify or measure the impact or outcomes from the VRQA's stakeholder consultation or engagement but these activities could be expected to improve stakeholder satisfaction with educational resources, materials and communication channels provided by the VRQA.

Key findings from baseline data

The VRQA 2018 Client and Stakeholder Research revealed:

- the VRQA provided high quality customer service to the home schooling with a net

satisfaction score of 76% across four criteria.⁸ Satisfaction was higher amongst parents who registered their children in 2018 (84%), than those registered prior to 2018.⁹

- home schooling parents were most satisfied with courteous and helpful staff, and least satisfied with guidance and support materials, particularly with respect to the information required to provide at review.

⁸ Criteria includes: Staff who are courteous and helpful; sufficient contact information; timely information about changes to home schooling regulation; and guidance and support material.

⁹ Parents whose children were already registered for home education do not need to create a learning plan. A learning plan template is available to support those parents seeking guidance, but its use is optional.

5. CHILD SAFE STANDARDS IN SCHOOLS OUTCOME EVALUATION

Victorian schools have a duty of care to provide a safe learning environment to their students and to embed the compulsory minimum CSS under the *Child Wellbeing and Safety Amendment (Child Safe Standards) Act 2015* (Vic). This legislation is administered by the Department of Health and Human Services through the Commissioner for Children and Young People (CCYP). Ministerial Order No. 870 applies the CSS in Victorian schools as a requirement for school registration. The Minister for Education also confirmed the VRQA would play a key role in monitoring and enforcing schools' compliance with the new standard, and that the VRQA would play an important leadership role in informing and educating school system owners and school leaders to understand and fulfil their responsibilities. The VRQA SOE continued this expectation that the VRQA would provide compliance related assistance and advice to educational organisations, specifically Victorian schools. Baseline data tables can be found at **attachment 3**.

COMPLIANCE RELATED ASSISTANCE AND ADVICE

The VRQA Board attested that the VRQA completed all relevant activities relating to implementing the CSS in Schools.

Table 6: Summary of expectations for compliance related assistance and advice (CSS)

Expectations	SOE Response (actions)	Acquitted
Continue to provide clear guidance and support for educational organisations to successfully implement the CSS, and meet the required standards for registration, and working in partnership with all sectors to embed the minimum standards as a core part of school improvements and effective governance.	<ul style="list-style-type: none"> Provide clear guidance and support to educational organisations to successfully implement the CSS 	✓
	<ul style="list-style-type: none"> Publish refreshed evidence guides for the <i>Guidelines to the Minimums Standards and Other Requirements of Schools Including those Offering Senior Secondary Courses</i> (the VRQA Minimum Standard Guidelines) 	✓
	<ul style="list-style-type: none"> Work with school review bodies to build consistent approaches across sectors, and support training of their review panels to identify compliance with the CSS 	✓
	<ul style="list-style-type: none"> Incorporate CSS in the risk framework for schools reviewers 	✓
Legend: ✓ - action has been completed		

Source: Attachment 1

Key Outputs

The VRQA has developed information and resources to embed the CSS in schools including a dedicated section on its website, video resources, fact sheets and tips, and links to other external resources. This included the publication of a fact sheet on *Changes to the Guidelines to the Minimum Standards* (updated and published in April 2018).

The VRQA has been working with school review bodies to develop its approaches to undertaking reviews across sectors, and support training of its review panels to identify compliance with the CSS. This has taken the form of regular senior level meetings between the VRQA CEO and the Deputy Secretary of the Regional Services Group (DET) and with the CECV CEO. There have also been meetings at officer level as well as a cross-sectoral workshop convened by the VRQA on CSS implementation, which was held on 3 December 2018. The VRQA has also attended meetings with DET and CECV on assessing compliance with the CSS and participated in reviewer training sessions.

An assessment of the CSS was incorporated in the VRQA risk framework for all cyclical school reviews commencing in 2017.

In addition to the activities in the VRQA Board SOE response, VRQA also:

- attended regular meetings with Independent Schools Victoria (ISV) and independent school stakeholders to discuss the implementation of Ministerial Order No. 870 and identify any emerging issues.
- hosted information sessions for organisations seeking school registration and schools scheduled for cyclical review incorporating guidance and advice on Ministerial Order No. 870 and dedicated guidance material on VRQA website.
- met regularly with the CCYP to exchange information regarding compliance with CSS to develop consistent understanding of what is expected of the VRQA.
- completed consultation to review the VRQA *Guidelines to the Minimum Standards Guidelines and Other Requirements of the Registration of Schools Including Those Offering Senior Secondary Courses*. These refreshed Guidelines have been published on the VRQA website.
- completed the Child Safe Standards Implementation Feedback Project which saw over 200 principals provide insight about the implementation of the Standards.
- completed the consultation and reporting phase of the Child Safe Standards Specialist Schools Project to examine the current status of implementation of the CSS in specialist schools. Consultation commenced in April 2018, with the project due for completion in 2019. A further meeting with key stakeholders is scheduled for early Term 1, 2019 to identify priority tasks and allocate roles and responsibilities to undertake those tasks.
- commenced and completed in June 2018 a boarding facilities scoping project which aimed to better understand the work of schools in managing the risk of child abuse within boarding facilities. This should enable VRQA to provide advice, guidance and customised support to help schools with boarding facilities meet the Standards. Further meetings of the Boarding Facilities Working Group are scheduled for 2019.
- identified some areas of concern for student welfare and implementation of the CSS in English Language Intensive Courses for Overseas Students.
- published refreshed VRQA *Guidelines for Enrolment of Overseas Students aged under 18 years* which includes sections relating to the CSS.

These activities and projects contribute to building consistent approaches across sectors and ensuring different sectors are appropriately targeted. The VRQA continues to work with the CCYP on CSS compliance. To build on this work, VRQA should consider putting in place measures to assess the effectiveness of its approaches, especially with regard to consistency of reviews across sectors.

The VRQA has advised that it undertook 43 school reviews in 2017-18, including 38 independent school cyclical reviews; 2 government school priority reviews, and; 3 independent school priority reviews.

In 2017-18, there were 634 General Reviews undertaken across all sectors, 50 specific reviews, and 4 non-review investigations (see **Glossary** and **attachment 2** for more information about these compliance monitoring activities).

The Hot Review Program is a quality assurance activity that the VRQA undertakes annually with DET and the CECV to assess the effectiveness of programs for reviewing school compliance with the minimum standards.

The VRQA undertook 18 hot reviews of Catholic and government school reviewers in 2017-18 to assess the quality of the programs used for reviewing school compliance with the minimum standards (VRQA, 2018a: pg. 8). In 2016-17, the number of hot reviews conducted was 22 (VRQA, 2017a: pg. 8).

Key findings from baseline data

Analysis of baseline data revealed that:

- 34% of schools reviewed against the minimum standards in 2017-18 through the General review process were found to be initially non-compliant with at least one of the CSS. Another 28% of schools were found to be initially non-compliant with at least one of the CSS during a Specific Review that same year.
- all identified incidences of non-compliance were corrected as part of the review process. Non-compliance was found across the 7 standards and the Principle of Inclusion
- there have been no sanctions or enforceable undertakings issued by the VRQA with respect to the CSS.
- 9 out of 10 schools agree that CSS compliance related assistance and advice provided by the VRQA has been helpful, noting that these figures largely represent the views of the independent school sector as measured by the VRQA 2018 Client and Stakeholder Research. This has not changed since the previous year.
- 4 out of 10 schools report needing further support from the VRQA to implement the CSS (largely independent schools as per the VRQA 2018 Client and Stakeholder Research). This has not changed since the previous year.

Ministerial Order No. 870 came into effect on 1 August 2016. Baseline data obtained in the VRQA stakeholder survey and annual report suggests that the review process identified non-compliance against the standards in Victorian schools and highlights that more work needs to be done to embed the regulation. DET considers the CSS should continue to be an area of focus for the VRQA and for future SOEs subject to the discretion of the Ministers.

The qualitative results of the VRQA 2018 Client and Stakeholder Research suggests the following opportunities:

- while the information VRQA has provided on the CSS was rated by respondents (primarily independent schools) as 'excellent', the VRQA could help schools manage priorities through some form of on-going interaction to keep CSS a priority.
- some advice and assistance may need to be targeted to different cohorts in schools (for example, volunteers or the broader school community) who may have different levels of understanding and involvement.

6. EXPULSIONS REFORM OUTCOME EVALUATION

In response to the Victorian Ombudsman report published in August 2017 on its *Investigation into Victorian government school expulsions*, the Minister for Education issued Ministerial Order No.1125 (Procedures for Suspension and Expulsion of Students in Government Schools). This Order stipulates expulsions reform only in government schools with implementation being the responsibility of DET. This Order took effect on 16 July 2018. The SOE required the VRQA to align relevant guidance on expulsions policies and procedures with the order. More information can be found at **attachment 4**.

COMPLIANCE RELATED ASSISTANCE AND ADVICE

The VRQA Board attested that the VRQA has completed all VRQA Board response activities relating to expulsions reform.

Table 7: Summary of expectations for compliance related assistance and advice (Expulsions reform)

Expectations	SOE Response (actions)	Acquitted
Align guidance on expulsions policies and procedures in relation to government schools with the Ministerial Order 1125 to govern expulsions in Victorian government schools, in response to the Victorian Ombudsman's investigation into expulsions in Victorian government schools.	<ul style="list-style-type: none"> Consider implications of expulsions Ministerial Order for the VRQA's approach to assessment of schools' compliance with the Minimum Standards 	✓
	<ul style="list-style-type: none"> As necessary, update guidelines, supports and guidance on expulsions policies and procedures 	✓
	<ul style="list-style-type: none"> Awaiting detailed advice from DET on expectations¹⁰ 	✓
	<ul style="list-style-type: none"> DET briefing to be provided to the VRQA Board at the planning day 	✓
Legend:	✓ - action has been completed	

Source: Attachment 1

Key outputs

The VRQA has updated its Guidelines to the Minimum Standards to reflect the new requirements for government schools under Ministerial Order 1125 in the section 'Student behaviour management (discipline)' (pg. 23).

The VRQA Board was briefed by senior DET officers on expulsions reform at the June 2018 meeting. Ongoing liaison occurs with DET and other stakeholders in relation to expulsion policy and procedures.

¹⁰ The Order had not been finalised at the time the VRQA drafted its VRQA SOE Board response.

Key findings from baseline data

There is currently no available baseline data to assess the SOE with respect to expulsions reform. Given the timing of the Ministerial Order on expulsions for government schools and the limited role that the VRQA plays in regulating this requirement, it is not possible to comment directly on the impact of Expulsions reform activities. Since the VRQA plays a limited role in this area, future SOEs could consider whether expulsions reform should remain an area of focus.

7. APPRENTICESHIP AND TRAINEESHIP OUTCOME EVALUATION

The VRQA regulates A&Ts in Victoria by recognising GTOs, determining qualifications, approving employers, and regulating training contracts between employers and A&Ts. In late 2017, the *Apprenticeship and Traineeship Taskforce Report* was published by the Victorian Skills Commission and raised concerns about quality of delivery and assessment for A&Ts and the decreasing rate of completions. The VRQA SOE letter broadly expects the VRQA to ensure quality arrangements for A&Ts, including monitoring of GTOs, make the service model easier to negotiate, and deliver the A&T reform agenda. Although not a regulatory outcome, the SOE also expected the VRQA to work with DET to improve completion rates. Many of the actions outlined in the VRQA Board SOE response were to enable the VRQA to better identify and manage the risks associated with regulating A&Ts. Baseline data can be found at **attachment 5**.

RISK-BASED STRATEGIES

The VRQA Board attested that the VRQA met two of the four risk-based strategy expectations for A&Ts with another two ongoing. The action to interface a VRQA A&T contract database (Epsilon) with the Commonwealth database was interrupted due to changes by the Commonwealth. This is explained in greater detail below.

Table 8: Summary of expectations for Risk-based strategies (A&Ts)

SOE	SOE Response	Acquitted
<p>Exercise employer approval powers and enforce employer, apprentice and trainee obligations.</p> <p>Recognise and monitor GTOs against National Standards</p> <p>Improve the secure registration of A&T to enable better monitoring and analysis of trends.</p>	<ul style="list-style-type: none"> Appoint regulatory field services contractor to confirm A&T employers', apprentices and trainees' compliance with contractual obligations to confirm apprentice and trainee employers, and apprentices and trainees comply with contractual obligations, based on state-wide emerging risk areas Take proportionate regulatory actions as required 	✓
	<ul style="list-style-type: none"> Implement the interface between Epsilon and Commonwealth A&T contract apprenticeship database Communicate and engage Epsilon users Implement Epsilon by December 2018 	Ongoing
	<ul style="list-style-type: none"> Undertake required site audits of selected GTOs and financial health assessments of new GTOs 	✓
	<ul style="list-style-type: none"> Continue regulatory activity to ensure compliance with regulatory obligations and ensure quality of A&Ts. 	Ongoing
Legend:	✓ - action has been completed.	

Source: Attachment 1

Key outputs

Delayed delivery of the Commonwealth's A&T contract database system hindered Epsilon's delivery and then in May 2018, the Commonwealth announced the discontinuation of the

Australian Apprenticeship Management System (AAMS) project altogether.¹¹ Connecting Epsilon to the Commonwealth's Training and Youth Internet Management System (TYIMS), rather than the proposed AAMS, has meant that the VRQA/DET will not realise all of the benefits originally envisaged in the Epsilon business case, but there will be some increased efficiencies and the system will be more secure.

The VRQA also commenced the State Register Client Relationship Management software enhancements project, which involved an upgrade to a more current version. The project ensures that VRQA systems continue to be supportable by Microsoft and to enable minor changes and enhancements without the need to engage external vendors. The newer version has an improved user interface and integrates with other Microsoft products enabling a more seamless business process.

The VRQA appointed The BUSY Group Ltd, now trading as Victorian Apprenticeship Field Services (VAFS), to undertake regulatory field services. This contract commenced in September 2018 with a new delivery model with risk ranked according to complexity. This new model is designed to identify risk through contact with apprentices/trainees before being escalated to a site visit to increase the chance of detection of non-compliance and reduce regulatory burden on compliant employers.

The VRQA recognised 24 existing GTOs for a 5-year period in 2018. An annual review of 5 GTOs was also conducted, with GTO site audits conducted in October and November. The VRQA advised that no financial health assessments were completed in 2018 as these had been previously undertaken for existing GTOs in 2017 as part of the 5-year registration cycle.

Key findings from baseline data

The analysis of baseline data revealed:

- There were 76,879 active A&Ts in 2017-18 and 24,645 active employers. Approximately 48% of active A&Ts were new commencements, which includes A&Ts that have switched employers.
- There were 19,533 contract cancellations in 2017-18 which includes apprentices/trainees that have cancelled and left the market, and those that recommenced with a new employer and a new contract.
- The number of employer approvals has dropped by 16% between 2016-17 and 2017-18.
- The number of registered training contracts declined over the same period by 8%. The VRQA notes that the decline is generally consistent with national trends and most of the variation is within traineeships (VRQA 2018a, p. 17).
- While the number of traineeship cancellations has improved in 2017-18 (a reduction in cancellations of 18% since 2016-17), the number of apprenticeship cancellations has increased by 11% since 2016-17.
- Formal disagreements (disputes) between an A&T and an employer about training contracts increased from 12 to 20 between 2016-17 and 2017-18). These are disputes that are not able to be resolved at the time of a visit or soon after by a VRQA Authorised Officer

¹¹ In 2014, DET and the VRQA agreed to a VAGO recommendation to replace the Direct Entry Level Training Administration (DELTA) database. The VAGO audit, which was to assess whether the activities of the department and the VRQA maximised A&T completions, noted that issues around the accuracy, security, timeliness and scope of the DELTA database affected the regulator's ability to effectively regulate and manage contractual risks (VAGO, 2014; pp 34-35). At roughly the same time, the Commonwealth agreed to replace its Training and Youth Internet Management System (TYIMS) with a new Australian Apprenticeship Management System (AAMS) project. As the Commonwealth is the source of the data for the training contracts, the VRQA/DET Epsilon project board decided to build Epsilon to interface with AAMS.

that has powers under the ETR Act. Formal disputes are then referred to the VRQA for a decision.

- The number of planned visits decreased slightly from 3,615 in 2016-17 to 3,596 in 2017-18.¹² These planned visits were conducted under a previous contract and the VRQA has established an agreement with a new provider, as mentioned above.
- The number of disputes and term adjustments¹³ have remained unchanged over the period (61 disputes and 127 term adjustments).
- Where regulatory issues were found to exist, they tended to include:
 - inappropriate scope of work/equipment or facilities to support the qualification in which the apprentice/trainee was enrolled
 - employers not being able to demonstrate they were monitoring training progress and keeping up-to-date records
 - employers failing to release apprentice/trainees to attend structured training for sufficient time
 - a lack of appropriately qualified/experienced supervisors.
- The number of campaign investigations undertaken by the VRQA decreased between 2016-17 and 2017-18 from 473 to 444.¹⁴ Campaign work included a major investigation into the Automotive Electrical sector.
- The number of delegate-ordered cancellations (where a dispute has not been resolved by other means) has dropped significantly from 163 to 19 (88% decrease) over the same period.

The A&T sector is large and complex and there is a high degree of contract attrition. There are many reasons for this, including economic, workplace (management styles, wages, A&T fit with work) and individual factors (personal circumstances such as re-evaluating career options, relocation, and illness). How best to monitor and analyse trends to help parties better understand their respective obligations will be an ongoing challenge. As such, A&Ts will need to remain a focus of future SOEs.

STAKEHOLDER CONSULTATION AND ENGAGEMENT

The VRQA Board attested that the authority has met or is meeting all of the activities relating to stakeholder consultation and engagement with respect to A&Ts.

¹² Under a planned visit, an employer is randomly selected and notified that a regulatory field officer will attend the workplace to monitor compliance to an A&T contract. The planned visits noted here relate to those conducted under the former services contract. The service's reach under the initial contract focussed on a predetermined number of visits which was reviewed in 2017-18 to better identify non compliance which requires additional effort to resolve. The VRQA and the Busy Group agree on a quarterly work plan that takes into consideration the type of work required and other influencing factors such as complexity, region, qualification or time of year. The new contract has been designed to achieve reach and to better identify non-compliance.

¹³ Most disputes relate to a disagreement between an employer and an apprentice who seeks to break the training contract perhaps to seek employ. These prompt a planned visit. Term adjustments can be extensions, credits or reductions, these can occur when parties request extra credit for time served, an early completion, have had a suspension on a contract or a change in scheme type on an apprenticeship contract (from part-time to full-time or full-time to part-time).

¹⁴ A campaign investigation are where the VRQA identifies a trend and target a certain cohort of employers on a spot check basis. Campaigns might follow on from a risk assessment, or it could be in response to intelligence the VRQA received from a particular industry. A campaign investigation is designed to identify and address non-compliance. Past campaigns have involved hospitality apprentices, trainees providing in-home care, and automotive electrical apprentices (see break out box for an example).

Table 9: Summary of expectations for stakeholder consultation and engagement (A&Ts)

Expectations	SOE Response (actions)	Acquitted
Determine approved training schemes with advice through the VSC as appropriate VRQA was also required to partner with DET to improve completion rates; make the service model easier to negotiate, and deliver the Government's A&T reform agenda.	<ul style="list-style-type: none"> Determine approved training schemes as required 	Ongoing
	<ul style="list-style-type: none"> Engage with VSC 	✓
	<ul style="list-style-type: none"> Continue regulatory activity to ensure compliance with regulatory obligations, to ensure quality of A&T 	Ongoing
Legend:	✓ - action has been completed	

Source: Attachment 1

Key outputs

In 2018, the VRQA:

- approved 13 training schemes.
- participated in the VSC Industry Advisory Group meetings and met regularly with the VSC, with quarterly meetings between the VSC and VRQA CEO/Executive Manager.

The VRQA also undertook the following additional activities with respect to stakeholder consultation and engagement:

- collaborated with DET on apprenticeship reform and State budget outcomes as a part of the VET reform agenda, including the re-introduction of Trade Papers.
- in February 2018, a Memorandum of Understanding was signed with the Apprenticeship Employment Network (AEN) to co-regulate member GTOs in conducting annual self-assessments.

The VRQA also undertook the following additional activities to improve communication with and the experience of stakeholders:

- developed GTO Policy and Procedures to outline responsibilities under the ETR Act, and the National Standards for Group Training Organisations improving compliance related assistance and advice.
- revised the Apprenticeship Dispute Resolution Policy to enable disputes to be resolved in a timely manner.
- restructured to align the vocational education and training function with the A&T function under one Division.

Key findings from baseline data

Analysis of baseline data revealed the following:

- awareness of the VRQA and its role and function is relatively low amongst both A&T and employer cohorts. This improved in 2018.
- An increasing number of employers and A&Ts need support to understand and meet their training contract obligations such that the:
 - percentage of employers that need support to understand and meet their training contract obligations increased from 2% to 16%
 - percentage of apprentices and trainees that need support to understand and meet their training contract obligations increased from 6% to 22% (see Table 14 at **Attachment 5**).

Qualitative results from the VRQA 2017 Client and Stakeholder Research indicate the following:

- RTOs and the Apprentice Network Providers (ANP) are an important channel for compliance related assistance and advice in the A&T sector. One apprentice said “VRQA should [connect with apprentices and trainees] through the RTO” (VRQA, 2018c: pg. 27).
- the VRQA could improve the quality of its communication by avoiding acronyms, reviewing the structure and accessibility of information on the website, or undertaking deeper engagement to segment cohorts (community RTOs vs private RTOs, large employers vs small employers) to target communication and advice more appropriately (VRQA 2018b, pg. 13).
- there may be duplication of compliance requirements by the VSC and the VRQA and between DET and the VRQA that could ease the regulatory burden of A&T clients (VRQA 2017c: pg. 13 & 23).
- the degree of compliance required for Community RTOs has caused some to leave the sector (VRQA, 2017b: pg. 39).
- stakeholder feedback suggest that there is an opportunity to improve the degree of understanding of the role of the VRQA in the sector more broadly. One A&T Stakeholder commented in 2017, “... if more people were aware of their obligations up front, they might have less of that issue down the track” (VRQA, 2018c: pg. 19). The same stakeholder also commented that VRQA communication and activity in the A&T space had been good, but that they would like to see more of it.
- most employers and apprentices/trainees indicated that they would go to a RTO/TAFE or an ANP to clarify any A&T related matter, rather than the VRQA. This could be because there is a perception that the VRQA will only get involved if there is a serious issue.

Providing regulatory support to employers and A&Ts in a large and complex system remains a key challenge for the VRQA. The results of the VRQA 2018 Client and Stakeholder Research suggest increasing demand from both employers and apprentices/trainees for support in meeting their training obligations. There may be opportunities for the VRQA to reduce the burden on A&T related stakeholders by improving the accessibility of information on its website and using RTOs as a key communication channel for information about the role and function of the VRQA in the A&T sector.

8. PROCESS EVALUATION

As noted, DET is required to conduct both a process evaluation and an outcome evaluation of the VRQA SOE.

The intent of the process evaluation is to drive continuous improvement in the SOE process (including future refinements of the SOE Framework and DET's application of it), to develop better SOEs over time, to document processes, and to share best practice across government.

METHOD

The process evaluation seeks to answer three broad questions:

1. How appropriate was the process for developing the SOE letter?
2. Did the regulator deliver the improvements and targets established in the SOE letter?
3. Was the regulator's response delivered on time?

Based on the DTF guidelines (DTF, 2018b: p. 5), the second and third questions provide some insight into the suitability of expectations and the SOE response activities, and the balance between aspiration and achievability. They also acts as a contextual input into the outcome evaluation.

Scope

The process evaluation considers both the process used to develop the SOE under the new SOE Framework and the SOE evaluation. It considers the role played by DET, the VRQA, and DTF although it focusses largely on the experience of DET and VRQA with respect to implementing the process of the new SOE Framework.

Data collection

Data to inform the process evaluation were drawn from two sources:

- Qualitative feedback from DET and VRQA staff involved in the development of the VRQA SOE. This feedback was collected via meetings with relevant staff in DET and the VRQA involved in the development of the SOE and an open-ended questionnaire.
- Approved acquittal of VRQA Board SOE response (found at **attachment 1**).

Limitations

The staggered advice from DTF regarding the requirements of the SOE Framework and the evaluation guidelines meant that the evaluation plan was developed after the SOE letter was developed. As a consequence, processes were not documented with an evaluation in mind. The findings are therefore based on qualitative feedback collected in a semi-structured way, with feedback sought from DET staff and VRQA officers.

SUMMARY OF FINDINGS

How appropriate was the process for developing the SOE letter?

The process outlined in the new SOE Framework and the SOE evaluation guidelines was appropriate and in the broad sense, adopted. The DTF elements of good regulatory practice, VRQA Board self-assessment and Good Regulatory Practice Plan (GRPP) were used as inputs, however there is greater scope for these exercises to play a more substantial role in the

development of the SOE. For example, the usefulness of the self-assessment would be enhanced if it identified areas of potential weakness (risk) as well as strengths, and if the GRPP highlighted priority areas and initiatives. This would better inform the development and structure of future SOE letters and facilitate shared priorities between DET and the VRQA.

The VRQA integrated the SOE into its strategic plan in 2018. In the future, the VRQA could integrate its self-assessment and the development of the GRPP with its strategic planning and organisational risk assessment processes.

DTF progressively distributed guidance material to implement the new SOE but more time was needed to understand and implement the new requirements. The VRQA SOE benefited from previous work undertaken by DET and the VRQA, namely, the reforms to the ETR Regulations. This provided a solid evidence base from which to develop informed improvements and targets for some part of the VRQA SOE in the absence of a prior evaluation. Greater clarity of the role and responsibilities of DET and the VRQA by DTF would have been beneficial. For example, it was initially unclear whether the VRQA was required to approve the evaluation plan, or who the primary audience of the evaluation report was (the Ministers, department, public or the regulator). DTF could establish a community of practice for the SOE to facilitate communication and encourage shared learning.

Some difficulties were encountered integrating regulator and departmental approval timeframes with the SOE timelines, although this is largely due to the adjustment to the new process and does not reflect an issue with the general timelines outlined in the SOE Framework. Naturally, this first cycle under the new SOE Framework has been a shared learning process and improvements can be expected in subsequent cycles. The new SOE framework required greater engagement and commitment of resources from all stakeholders (VRQA, DET, and DTF) than previous SOE processes.

Did the regulator deliver the improvements and targets established in the SOE letter and regulator response on time?

The SOE letter contained both broad aspirations and specific improvements and targets, including some expectations for business-as-usual activities that did not require specific additional action or continual improvement. An example was that the VRQA was expected to “undertake core responsibilities and full range of functions and powers provided in the Act”. These general aspirations were not measured in this evaluation. The focus of the outcome evaluation has been to establish a foundation of specific measures so that future improvements and targets have appropriate quantitative measures linked to them to facilitate future evaluations.

The process of undertaking this evaluation has therefore provided an opportunity for future SOEs to adopt measureable performance targets so that the SOE can meet the overarching goal of promoting continual improvement. Future SOEs would also benefit from clearer line of sight between the Good Regulatory Practice Framework, expectations, VRQA Board response activities, and these performance targets.

The VRQA Board’s acquittal of the VRQA’s activities (**attachment 1**) indicated that the VRQA commenced all of its activities to which it had committed. The majority of these were completed within the first 12 months (January to December) of the 18-month SOE period, while others are ongoing. The next iteration of the VRQA SOE could consider if more stretch targets might be appropriate, and how the SOE might help facilitate and document organisational learning.

ABBREVIATIONS & GLOSSARY

KEY ABBREVIATIONS

A&T – Apprenticeships and Traineeships

ANP – Apprenticeship Network Provider

CCYP – Commissioner for Children and Young People

CECV – Catholic Education Commission Victoria

CRICOS – Commonwealth Register of Institutions and Courses for Overseas Students

CSS - Child Safe Standards

DET – Department of Education and Training

DTF – Department of Treasury and Finance

ETR Act – Education and Training Reform Act 2006

ETR Regulations – Education and Training Reform Regulations 2017

GRRP – 678/*

GTO – Group Training Organisation

ISV – Independent Schools Victoria

Ministers - Minister for Education and the Minister for Training and Skills

RTO – Registered Training Organisation

SOE - Statement of Expectations

SOE Framework - Statement of Expectations Framework for Regulators

VAGO – Victorian Agent-General's Office

VET – Vocational Education and Training

VHEAC – Victorian Home Education Advisory Committee

VRQA - Victorian Registrations and Qualifications Authority

VSC – Victorian Skills Commission

GLOSSARY

School review – General. Where a review is undertaken to determine whether the school has attained and continues to attain the prescribed minimum standards for registration. The review is part of a review program.

School review – Specific. Where a review is undertaken to determine whether the school has attained and continues to attain the prescribed minimum standards if the VRQA believes, on reasonable grounds, that (a) there are matters concerning the safety of students at the school which require urgent action to be taken or (b) exceptional circumstances.

School Review – Priority. An out-of-cycle review that may or may not be a specific review.

Hot Review Program. – A quality assurance activity that the VRQA undertakes annually with DET and the CECV to assess the quality of programs for reviewing school compliance with the minimum standards.

Enforceable undertaking. A written agreement between the VRQA and a registered school that is the subject of a review or the VRQA and a Registered Training Organisation (RTO), regulated by the Education and Training Reform Act 2006 (the Act). The VRQA considers using an enforceable undertaking in circumstances where the instances of non-compliance are not so significant to warrant actions of more severity; or where there is significant non-compliance with a standard but where the school or RTO is genuinely prepared to admit and rectify the non-compliance; where the VRQA seeks outcomes that may not be available through other means.

Non-review investigations (complaint investigations). The VRQA is required to investigate a complaint alleging a breach of obligations by a school. Some complaints may result in a general or specific review being undertaken by the VRQA of the school's compliance with the minimum standards.

Expulsion is the process of permanently excluding the student from the school in which he or she is currently enrolled.

Suspension is a disciplinary measure that involves temporary removal of a student from classes or school approved activities for a specified period of time. The child will be allowed to return to class or the school approved activity after the set period of suspension.

A&T Risk Assessment Services jobs are contacts made via the phone with apprentices, trainees and employers across Victoria to determine compliance with training contracts and to identify those cases that require more detailed investigation.

A&T Medium Complexity Investigations jobs result from RAS escalations or as part of a campaign.

A&T High Complexity Investigations jobs resulting from a dispute between parties to a training contract or a complaint made to the VRQA.

Group Training Organisation (GTO). GTOs select and recruit, pay wages and other labour costs, manage the quality of training, and provide additional care and ongoing support needed to complete the training contract. The VRQA registers GTOs as employers, ensuring they have the facilities, knowledge and skills to employ and train and apprentice/trainees as per ETRA. VRQA also regulates GTOs against additional responsibilities under the Commonwealth's National Standards. The standards include induction and hosting arrangements that are inherent to the GTO model.

Contract attrition rates refers to the proportion of apprentices and trainees who commenced a contract in a given period and who have since cancelled or withdrawn from that contract.

Parent - a 'parent' in relation to a child, includes a guardian and every person who has parental responsibility for the child including parental responsibility under the *Family Law Act 1975* (Cth).

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A.1 VRQA SOE ACQUITTAL REPORT

VRQA Ministerial Statement of Expectations – 2018 Acquittal

SOE Activity	VRQA Activity	Expected Milestones	Progress / Commentary	Status
1. General				
<ul style="list-style-type: none"> Undertake core responsibilities, and full range of functions and powers provided in the Act Continue to improve the efficiency and effectiveness of regulatory activities with ongoing improvements to regulatory practice Reduce regulatory burden on regulated entities, in particular multi-sector providers, by streamlining regulatory processes Continue engaging with stakeholders to inform improvements on regulatory activities Continue to provide clear guidance and support for educational organisations to successfully implement the Child Safe Standards, and meet the required standards for registration Work in partnership with all sectors to embed minimum standards as a core part of school improvement and effective governance Continue to strengthen evidence based approach to regulation Collect relevant data to inform a risk-based approach for resource allocation and activity focus, and evaluate process outcomes Continue to provide information to regulated entities to improve transparency of regulatory assessment processes and methodology, to reduce non-compliance Provide timely updates to information to reflect regulatory changes and stakeholder feedback Incorporate these expectations in the VRQA Strategic Plan for 2018-20 and publish this SOE, with VRQA response, on the VRQA website 	Strategic and operational planning, and reporting cycle	<ul style="list-style-type: none"> Annual Board Planning Day Strategic and operational plans with regular progress reports Annual Board self-evaluation 	<ul style="list-style-type: none"> Annual Board Planning Day held 7 June 2018-2020 Strategic Plan developed and published on VRQA website – Progress report at Item 14 of this agenda 2018-2019 Operational Plan submitted to October VRQA Board meeting Annual Board self-evaluation process completed (June 2018) – Actions include future-proofing strategies, succession planning, Board composition and knowledge management processes 	Green
	Regular meetings of the Board Chair with Ministers and Department of Education and Training Secretary	Meetings held	<ul style="list-style-type: none"> Regular meetings held between Board Chair, CEO and Minister for Education; Board Chair, CEO and Secretary, DET; and CFO, Audit and Risk Management Committee Chair and Deputy Secretary, Finance DET on as-required basis 	Yellow
	Stakeholder engagement strategy	<ul style="list-style-type: none"> Undertake and publish annual client and stakeholder research findings and regular stakeholder events - act on feedback to improve regulatory services Ensure that key stakeholders have opportunity to engage with VRQA Board members and senior staff to raise regulatory issues Redevelop and launch the VRQA website Provide clear guidance and support to educational organisations to successfully implement the Child Safe Standards 	<ul style="list-style-type: none"> 6th Annual Stakeholder Breakfast held 4 May – first year for attendees from home schooling sector 2017 Client and Stakeholder Research published (February 2018) Biannual complaints report provided to Board and Audit and Risk Management Committee (ARMC) – See Att 2 of this Item 2018 Client and Stakeholder Research currently underway – Draft report to February 2019 Board meeting Operational risks reported to Compliance and Quality (C&Q) and Vocational Education and Training (VET) subcommittees 	Green
	Subcommittees that focus on key Board priority areas	<ul style="list-style-type: none"> Provision of regular reports to the Board Review charters and KPIs annually 	<ul style="list-style-type: none"> All subcommittees report to first subsequent Board meetings The Board developed the Home Schooling Review Subcommittee Charter in February 2018 Board Terms of Reference and all Board subcommittee charters reviewed in 2018 Information Technology and Knowledge Management (ITKM) subcommittee planning session held (September 2018) – Conceptual framework developed in response to data and knowledge management priorities outlined in 2018-20 Strategic Plan Board KPIs reviewed (April 2018) 	Green
	Formal MoUs with a range of bodies, including co-regulators and school review bodies	Receive annual reports from school review bodies	<ul style="list-style-type: none"> Annual reports submitted (October 2018) 	Green
	Integrity framework and compliance management system	Review the integrity framework every 2 years and compliance management system annually	<ul style="list-style-type: none"> Board integrity framework review completed (April 2017) – Next scheduled April 2019 Financial management compliance report (Financial year ending 30 June 2018) submitted to ARMC (August 2018) Review of Complaints Policy and Procedures in progress Compliance management system review currently underway 	Green
	Finance and risk framework	<ul style="list-style-type: none"> Undertake regular reviews of the Risk Management Framework and Risk register Annual budget, with quarterly reports and half-year budget update Table annual financial report and report of operations in Parliament Develop an annual internal and external audit program and act on opportunities for improvement to operations 	<ul style="list-style-type: none"> VRQA Risk Register submitted to every ARMC and Board meeting for approval 2018-2019 VRQA Annual Budget approved at August Board meeting Annual financial report and report of operations for 2017-2018 tabled in Parliament 20 September Annual risk workshop held (November 2018) 	Yellow
	Strengthening evidence and risk-based approaches to regulation	<ul style="list-style-type: none"> Publish refreshed evidence guides for the 'Guidelines to the Minimum Standards and Other Requirements for Registration of Schools Including Those Offering Senior Secondary Courses' (the Minimum Standards) Work with school review bodies to build consistent approaches across sectors, and support training of their review panels to identify compliance with child safe standards Publish refreshed VRQA Guidelines and Standards for registration of Awarding Bodies and the Accreditation of Senior Secondary Qualifications Publish refreshed VRQA Guidelines for Enrolment of Overseas Students aged under 18 years 	<ul style="list-style-type: none"> Completion of a cross sectoral review of progress on implementing CSS involving Catholic Education Commission of Victoria (CECV) and DET Factsheet on Changes to the Guidelines to the Minimum Standards updated and published (April 2018) New specific requirements on Bushfire preparedness, Anaphylaxis management, Financial management and Child safe standards released via VRQA website (April 2018) Completion of the VRQA survey and review of a sample of school boarding facilities for compliance with CSS Schools ongoing work with CCYP on CSS compliance – Completion of CSS Implementation Feedback Project and ongoing work with CCYP for CSS Specialist Schools project VRQA Guidelines for Enrolment of Overseas Students aged under 18 years, with supporting fact sheet, published (April 2018) 	Green

Status Codes:

Grey = Not yet started

Yellow = Commenced and on track / ongoing

Green = Completed

Red = Overdue

SOE Activity	VRQA Activity	Expected Milestones	Progress / Commentary	Status
			<ul style="list-style-type: none"> Regular progress reports on CSS Specialist Schools Project (C&Q subcommittee) Allocation of additional resources to priority areas identified by specialist schools VAGO audit on CSS compliance – Audit terms confirmed (November 2018), scoping currently underway VRQA Guidelines and Standards for registration of Awarding Bodies and the Accreditation of Senior Secondary Qualifications submitted to December VRQA Board meeting for approval – Commencement scheduled for January 2019 Regular meetings between VRQA CEO and senior DET and CECV officers 	Yellow
2. Home Schooling				
<ul style="list-style-type: none"> Implement regulatory changes to home schooling outlined in the Education and Training Reform Regulations 2017 Provide high quality customer service to the home schooling community, being responsive and engaging, and sharing information Implement regulatory changes as efficiently as possible, move relevant business systems and processes online as soon as practicable Design processes so applications are assessed efficiently: collect data on applications assessment processing times and provide quarterly data to DET As assessment becomes well established, increase the number of applications that take less than 28 days Advise home schooling families of the estimated timeline for decision outcomes, and meet this timeline Develop targets for application assessment times and performance metrics to measure both improvements and sector compliance, collect data and submit quarterly reports to DET Expand resources to support home schooling families to understand and navigate new regulatory arrangements Continue working closely with DET in implementation, participate on VHEAC, and actively consider feedback provided by home schooling VHEAC members 	Continue communication and stakeholder engagement activities initiated in 2017 and share information on VRQA policies and procedures	<ul style="list-style-type: none"> Develop and launch a new and mobile responsive website Publish a newsletter to education stakeholders and the home schooling community Collect and analyse data on home schooling customer enquiries: web analytics and phone and email enquiries Include home schooling sector in the annual VRQA stakeholder and client research Collect feedback from home schooling parents through targeted activities, such as roadshows, newsletter requests, etc. 	<ul style="list-style-type: none"> Expanded the home education web presence from a single page to 24 pages, including a dedicated home schooling homepage Published an online home schooling resource library, providing home schooling families with resources from each learning area, helping them build their education programs Series of webinars on home schooling developed to support accessibility In collaboration with VHEAC, co-designed and published seven review and nine learning plan resources Home Schooling Reports for Quarter 1 (May 2018) and Quarter 2 (September 2018) submitted to the Minister for Education Launch of <i>Education @ Home</i> e-newsletter, circulated by VRQA to every home schooling family who has provided an email address Regulatory processes communicated to stakeholders through four editions of <i>Education @ Home</i> e-newsletter – Most recent edition emailed 2 October 2018 	Green
	Expand resources to support home schooling families	<ul style="list-style-type: none"> Establish VRQA Home Schooling Unit Establish Board subcommittee to oversee home schooling internal reviews 	<ul style="list-style-type: none"> VRQA Home Schooling Unit established (December 2017) Home Schooling subcommittee established (February 2018) 	Green
	Modify systems and processes	<ul style="list-style-type: none"> Engage with specialist supports and advisory bodies and modify systems and processes as appropriate Seek feedback from home schooling parents on the review process 	<ul style="list-style-type: none"> VRQA representation on VHEAC Application and review processes co-designed with home schooling stakeholders on VHEAC 	Green
	Implement CRM upgrade to improve efficiency, response times, data analytics and performance monitoring	<ul style="list-style-type: none"> Implement CRM upgrade Review effectiveness of upgraded Home Schooling CRM system (implemented December 2017), then work with DET Information Technology Department (ITD) to move to a fully online system 	<ul style="list-style-type: none"> CRM updated to improve metric data capture, and templates developed for metric reports Business processes established to ensure accuracy of CRM data CRM updated to enable automatic re-registration for home schooling families Home schooling CRM enhancement (Phase 2) – Alignment with business processes 	Yellow
	Develop targets for, and collect data on, application assessment times and performance metrics	<ul style="list-style-type: none"> Targets developed Data collected Data provided to the Department and VHEAC 	<ul style="list-style-type: none"> Introduced business processes to ensure accuracy of CRM data Ongoing collaboration between Home Schooling and Information Services on capturing and reporting relevant home schooling data Regular engagement and information sharing with DET via monthly DET / VRQA meetings and joint VHEAC participation 	Green
	Monitor and review application assessment timelines to: <ul style="list-style-type: none"> reduce time to process, from receipt of complete application advise home schooling families of likely decision timeframes meet the timeframes determine the number of days taken to assess each complete application 	<ul style="list-style-type: none"> Establish pool of expertise to assess applications Establish data collection and analysis processes Monitor and review application assessment timelines Report on assessment timelines 	<ul style="list-style-type: none"> Review process for rejected applications developed – Home Schooling Review subcommittee functioning as appeals panel Home Schooling CRM system developed for data capture (Introduced May 2018) Ongoing CRM updates to capture data necessary for new regulatory regime Ongoing internal moderation to ensure consistency of assessment and refine assessment processes Quarterly Home Schooling metrics published, including assessment timelines 	Green
	Work with the Department to implement home schooling regulations	<ul style="list-style-type: none"> Participate on the Victorian Home Education Advisory Committee (VHEAC) Actively consider VHEAC feedback Provide data and advice to DET on Guide to Home Education in Victoria 	<ul style="list-style-type: none"> Ongoing review of current registration and review processes for home schooling, including through consultation with the Victorian Home Education Advisory Committee (VHEAC) Regular engagement and information sharing with Department occurs through monthly DET/VRQA meetings and joint participation in VHEAC and quarterly home schooling reports 	Green

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Green = Completed

Red = Overdue

SOE Activity	VRQA Activity	Expected Milestones	Progress / Commentary	Status
3. Apprenticeships and Traineeships				
<ul style="list-style-type: none"> Exercise employer approval powers and enforce employer, apprentice and trainee obligations Recognise and monitor Group Training Organisations against National Standards Determine approved training schemes, with advice through VSC as appropriate Improve the secure register of apprentices and trainees, enabling better monitoring and analysis of trends Partner with DET to: improve completion rates; make service model easier to negotiate; and deliver the apprenticeship and traineeship reform agenda 	Enforce employer, apprentice and trainee obligations to ensure quality arrangements, via risk-based authorised officer visits to workplaces	<ul style="list-style-type: none"> Appoint regulatory field services contractor to confirm apprentice and trainee employers, and apprentices and trainees comply with contractual obligations, based on state-wide emerging risk areas Take proportionate regulatory actions as required 	<ul style="list-style-type: none"> New Regulatory Field Services (RFS) contract with The Busy Group Pty Ltd commenced (September 2018) The new RFS contract includes a risk based escalation model and improved performance metrics Enhancements to case management system (Job Ready) to support risk management process under development as at November 2018, to be fully implemented by 31 December 2018 Operational risks reported to VET subcommittee 	Green
	Implement a new secure register of employers, apprentices and trainees	<ul style="list-style-type: none"> Implement interface between Epsilon and Commonwealth apprenticeship database Communicate with and engage Epsilon users Implement Epsilon by December 2018 	<ul style="list-style-type: none"> Capital / operational funding for the Epsilon connection to the Commonwealth TYIMS system has been provided (August 2018) Epsilon Project Health Assessment to review project governance and test planned response to AAMS System project cancellation completed (October 2018) Testing feedback provided to Epsilon Project Team and developers in early 2018 Communications Unit to support relevant units with stakeholder and client engagement, and roll out of Epsilon project 	Green
	Recognise and monitor Group Training Organisations against the National Standards	<ul style="list-style-type: none"> Undertake required on site audits of selected GTOs and financial health assessments of new GTOs 	<ul style="list-style-type: none"> Existing GTOs received recognition for five year period (31 December 2022) Processes for recognition of new GTOs implemented in August 2018, including publishing of application forms GTO on site audit processes finalised in August 2018 Annual review of five GTOs conducted in 2018, with GTO on site audits conducted in October and November 2018 	Yellow
	Continue to determine approved training schemes, with advice through the Victorian Skills Commission (VSC) as per MoU	<ul style="list-style-type: none"> Determine approved training schemes as required Engage with Victorian Skills Commission (VSC) 	<ul style="list-style-type: none"> Participated in Victorian Skills Commission (VSC) Industry Advisory Group meetings in March and April 2018 Quarterly meetings between VSC and CEO / Executive Manager 13 Approved Training Schemes determined 	Green
	Support the Department to deliver the Government's apprenticeship and traineeship reform agenda, including improving completion rates and simplifying the service model	<ul style="list-style-type: none"> Continue regulatory activity to ensure compliance with regulatory obligations, to ensure quality of apprenticeships and traineeships 	<ul style="list-style-type: none"> Management of apprenticeship and traineeship state register including approving and revoking employers to employ apprentices and trainees and registering new training contracts New risk based regulatory field services contract commenced on 2 September 2018 Apprenticeship and traineeship campaign work included major investigation in the Automotive Electrical sector Re-introduction of trade papers commencing January 2019 – Trade titles confirmed and process developed for implementation in accordance with the Ministerial Direction 	Green
4. Expulsions Reform				
Align guidance on expulsions policies and procedures in relation to government schools with the new Ministerial Order to govern expulsions in Victorian government schools	In light of the Ministerial Order and Department policy reforms, review relevant regulatory instruments and other supports and guidance on expulsions policies and procedures	<ul style="list-style-type: none"> Consider implications of expulsions Ministerial Order for the VRQA's approach to assessment of schools' compliance with the Minimum Standards As necessary, update guidelines, supports and guidance on expulsions policies and procedures. 	<ul style="list-style-type: none"> Ongoing liaison with DET and relevant stakeholders in relation to expulsions policy and procedures In consultation with broader education community, review of the Guidelines to the Minimum Standards to ensure alignment with Ministerial Order 1125 VRQA Board briefed by senior DET officers at June meeting 	Yellow

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A.2 HOMESCHOOLING BACKGROUND

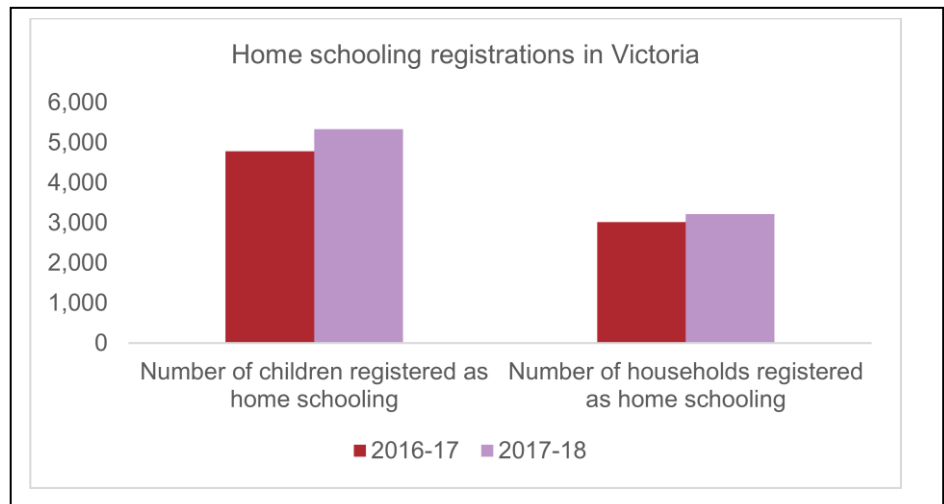
Policy Context

Under the ETR Act, all children should have access to high-quality education. It is the legal duty of the parent to ensure their child of compulsory school age (6-17 years) is either enrolled in a registered school or registered for home schooling.

In 2017, DET made changes to the regulation of home schooling as part of the new ETR Regulations and included the requirement to submit a proposed learning plan and review of a proportion of registered households. DET also established the VHEAC in August 2017 to provide feedback to the VRQA and the DET of the operation of the

regulations about home schooling issues. The number of children in home schooling has increased since the introduction of the new regulations.

Figure 2: Home schooling registrations in Victoria



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Home schooling baseline data

Table 10: Home schooling baseline data

EXPECTED OUTCOMES AND MEASURES (medium to long term)					
Measure	Qtr 1 2018 1 Jan – 31 Mar	Qtr2 2018 1 Apr – 30 Jun	Qtr3 2018 1 Jul – 30 Sep	Qtr4 2018 1 Oct – 31 Dec	Source
<i>Improved understanding of home schooling requirements by parents</i>					
The number of home schooling applications received	237	301	381	n.a	VRQA Home Schooling Quarterly report
The number of home schooling registrations	204	274	384	n.a	VRQA Home Schooling Quarterly report
The number of incomplete home schooling applications received	92	60	101	n.a	VRQA Home Schooling Quarterly report
The number of applications that seek an exemption from one or more of the key learning areas	32	36	60	n.a	VRQA Home Schooling Quarterly report
The number of exemptions granted	29	31	54	n.a	VRQA Home Schooling Quarterly report
The number of applications refused (and any reasons for refusal)	2	9	2	n.a	VRQA Home Schooling Quarterly report
The number of registered children reviewed against the benchmark of reviewing 10 per cent of all registered children each year	0	34	123	n.a	VRQA Home Schooling Quarterly report
The number of registrations cancelled (and the reasons for cancellation) ¹⁵	0	0	0	n.a	VRQA Home Schooling Quarterly report
The number of VRQA decisions on registration that result in a request for internal review	0	0	0	n.a	VRQA Home Schooling Quarterly report
The number of VRQA decisions on registration that result in the applicant seeking review in the Victorian Civil and Administrative Review Tribunal	0	0	0	n.a	VRQA Home Schooling Quarterly report

¹⁵ This metric relates to cancellations that stem from annual reviews and is not indicative of all cancellations.

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EXPECTED OUTCOMES AND MEASURES (medium to long term)					
Measure	Qtr 1 2018 1 Jan – 31 Mar	Qtr2 2018 1 Apr – 30 Jun	Qtr3 2018 1 Jul – 30 Sep	Qtr4 2018 1 Oct – 31 Dec	Source
<i>Improved application processing times</i>					
The number of home schooling applications received	237	301	381	n.a.	VRQA Home Schooling Quarterly report
The number of days taken to notify parents that an application is incomplete (average)	5	9	5	n.a.	VRQA Home Schooling Quarterly report
The number of days taken to notify parents that an application is complete (average)	5	7	5	n.a.	VRQA Home Schooling Quarterly report

In addition, the VRQA provided the following data on web customer enquiries (5 February 2018 – 31 December 2018):

- 51,232 users visited at least one home schooling page on the website
- Individual home schooling pages on the VRQA website were visited a total of 91,210 times
- The three most visited home schooling pages were:
 - Preparing a learning plan (6425 unique visitors)
 - Templates and samples (6363 unique visitors)
 - About registration (5910 unique visitors)
- The three most downloaded home schooling documents were:
 - Registration for Home Education – Application form (3441 unique downloaders)
 - Integrated Learning Plan – Template (2414 unique downloaders)
 - Integrated Learning Plan – Sample for a seven year old (1552 unique downloaders)
- Home schooling pages were most visited during October (11,618 page views).

A.3 CHILD SAFE STANDARDS IN SCHOOLS BACKGROUND

Policy Context

Victorian schools have a duty of care to provide a safe learning environment to their students. Victoria has 1,534 government schools and 713 non-government schools, all of which have a legislative responsibility to protect their students from child abuse. Ministerial Order 870 was issued by the Minister of Education to the VRQA and came into effect on 1 August 2016 and aims to ensure that Victorian schools implement and satisfy the CSS in the *Child Wellbeing and Safety Act 2005*. Meeting the requirements of this Ministerial Order is the responsibility of the school governing body and the school principal.

In a letter to the VRQA dated 18 December 2015, the Minister for Education confirmed the VRQA has a key role in monitoring and enforcing schools' compliance with the new standard and that the VRQA would play an important leadership role in informing and educating school system owners and school leaders to understand and fulfil their responsibilities.

Monitoring and enforcing the CSS in schools is undertaken through school registration and school reviews. The VRQA can conduct its own reviews, rely on a report by a school's representative, or appoint a reviewer to monitor compliance. DET is currently an appointed review body for government schools and the Catholic Education Commission of Victoria Limited (CECV) for Catholic schools in Victoria. These review bodies are required to submit annual reports on compliance of the schools they review, with the CSS. VRQA reviews compliance of all other independent schools. Since the CSS were introduced, schools have been required to develop new internal documents, processes and strategies and to demonstrate that their organisations are embedding child safe cultures. In 2017-18, the VRQA registered 17 new schools, re-registered 48 schools due to additions and/or amalgamations, and there were 9 schools that closed.

Figure 3: National and Victorian Child Safe Standards

Victorian Child Safe Standards as outlined in Ministerial Order 870	<ol style="list-style-type: none"> 1. Strategies to embed an organisational culture of child safety 2. A child safety policy or statement of commitment to child safety 3. A child safety code of conduct 4. School staff selection, supervision and management practices for a child-safe environment 5. Procedures for responding to and reporting allegations of suspected child abuse 6. Strategies to identify and reduce or remove risks of child abuse 7. Strategies to promote child empowerment and participation
Child Safe Standards developed by Royal Commission	<p>Standard 1: Child safety is embedded in institutional leadership, governance and culture</p> <p>Standard 2: Children participate in decisions affecting them and are taken seriously</p> <p>Standard 3: Families and communities are informed and involved</p> <p>Standard 4: Equity is upheld and diverse needs are taken into account</p> <p>Standard 5: People working with children are suitable and supported</p> <p>Standard 6: Processes to respond to complaints of child sexual abuse are child focused</p> <p>Standard 7: Staff are equipped with the knowledge, skills and awareness to keep children safe through continual education and training</p> <p>Standard 8: Physical and online environments minimise the opportunity for abuse to occur</p> <p>Standard 9: Implementation of the Child Safe Standards is continuously reviewed and improved</p> <p>Standard 10: Policies and procedures document how the institution is child safe</p>

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The Victorian Government has accepted in principle the ten CSS recommended by the *McClellan Royal Commission into Institutional Child Sexual Abuse* (chaired by Hon. Justice Peter McClellan) and DET has agreed to work with the Australian Government to implement these standards consistently in Victorian schools (see Table 11).

This will have implications for the VRQA. Apart from the recommendations relating to the Royal Commission's Child Safe Standards, other recommendations that are relevant to the VRQA include recommendations 6.22 (online safety framework and resources), 8.5 (records management), 13.3 (boarding schools), 13.4 (funding for Aboriginal and Torres Strait Islander boarding students), 13.6 (managing complaints about children with harmful behaviours) and 13.7 (guidance on preventing and responding to child abuse).

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Child safe standards baseline data

Table 11: Child safe standards baseline data (Annual Report)

EXPECTED OUTCOMES AND MEASURES (medium to long term)			
Measure	2016-17 *1 Jan to 30 Jun 2017 ¹⁶	2017-18	Source
Improved Compliance with Child Safe Standards (CSS) in Schools			
Compliance with CSS based on school reviews – General review (%initially not compliant; number)	35% (126)	34% (634)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Compliance with CSS based on school reviews – Specific (% of reviews initially not compliant; number of reviews)	17% (30)	28% (50)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Non review investigations ¹⁷ – Investigations against the CSS (% of reviews initially not compliant; number of reviews)	0% (5)	25% (4)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
NSSSP ¹⁸ Reviews – General reviews against the CSS ¹⁹ (% of reviews initially not compliant; number of reviews)	0% (0)	0% (0)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
OSSEO ²⁰ reviews – General reviews against the CSS (% of reviews initially not compliant; number of reviews)	0% (0)	0% (3)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Registration activity including assessment of compliance against the CSS ²¹ – Schools (% of assessments initially not compliant; number of assessments)	0% (20)	0% (32)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Registration activity including assessment of compliance against the CSS – NSSSP (% of assessments initially not compliant; number of assessments)	0% (1)	0% (6)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Complaint investigations relating to CSS (% of investigations initially not compliant; number of investigations)	10% (10)	31% (13)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19

¹⁶ The VRQA has advised that there were two phases to date for embedding the CSS in schools. Phase 1 involved education and set up and Phase 2, monitoring and enforcement. The VRQA Annual Report 2016-17 only reports the last six months, while the 2017-18 Annual Report records finalised cases for the full financial year.

¹⁷ A non-review investigation is an own-motion investigation that has not been directly referred to the VRQA as a complaint. They cross all sectors. The 4 non-review investigations in 2017-18 were from media reports and a letter to the Office of the Minister for Education.

¹⁸ Non-School Senior Secondary Education Providers (NSSSP). There were 43 registered NSSSPs in 2018 delivering VCE and/or VCAL. NSSSP applying to register are required to provide evidence of policies and procedures with respect to Child Safe Standards and requirements of the Child Wellbeing and Safety Act 2005. NSSSP are also required to provide evidence to ensure staff understand mandatory reporting, the failure to disclose offence, and the failure to protect offence.

¹⁹ NSSSPs are not normally reviewed. They have a 5-year registration period and have to go through a re-registration process in the last year of registration. Compliance with CSS is assessed during the re-registration process. The VRQA has advised that in 2018 all but one NSSSPs seeking re-registration were assessed against the CSS at site visit. The one exception was not assessed in 2018 as they had been assessed by site visit in 2017.

²⁰ Overseas Secondary Student Exchange Organisations (OSSEOs). Reviews are dependent on registration renewal cycles.

²¹ Registration can apply to new schools, new campuses, or new year levels. The 32 registrations in 2017-18 includes some amendments (new campuses) to registration and schools assessed and not registered.

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EXPECTED OUTCOMES AND MEASURES (medium to long term)			
Measure	2016-17 *1 Jan to 30 Jun 2017 ¹⁶	2017-18	Source
Number of CSS complaints referred from the CCYP (% of reviews initially not compliant; number of complaints) ²²	0% (2)	29% (7)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Sanctions imposed relating to the CSS	0% (0)	0% (0)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19
Enforceable undertakings related to the CSS	0% (0)	0% (0)	Annual Report 2016-17; Table 18 Annual Report 2017-18; Table 19

²² The VRQA Annual Report records activity that was finalised in the reporting period. Some of the referrals received from the CCYP were also referred to other agencies. The general nature of the complaints was about school management of incidents of alleged child abuse.

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Table 12: Child safe standards baseline data (VRQA Client and Stakeholder Research)

EXPECTED OUTCOMES AND MEASURES (medium to long term)				
Measure	2017	2018	Direction	Source
<i>Improved understanding of Child Safe Standards requirements by schools²³</i>				
VRQA materials and support from the VRQA have been helpful for our school in adopting the Child Safe Standards	90%	90%	No change	Client and Stakeholder Research 2017; Q12 Client and Stakeholder Research 2018; Schools, Q12
The Child Safe Standards have helped highlight the need for a culture of child safety at our school	90%	90%	No change	Client and Stakeholder Research 2017; Schools, Q12 Client and Stakeholder Research 2018; Schools, Q12
Our school's governing body is actively engaged with the Child Safe Standards	90%	90%	No change	Client and Stakeholder Research 2017; Q12 Client and Stakeholder Research 2018; Schools, Q12
Our school community is actively engaged in the Child Safe Standards	90%	90%	No change	Client and Stakeholder Research 2017; Q12 Client and Stakeholder Research 2018; Schools, Q12
Our school requires further help or support from the VRQA in implementing the Child Safe Standards	40%	40%	No change	Client and Stakeholder Research 2017; Q12 Client and Stakeholder Research 2018; Schools, Q13

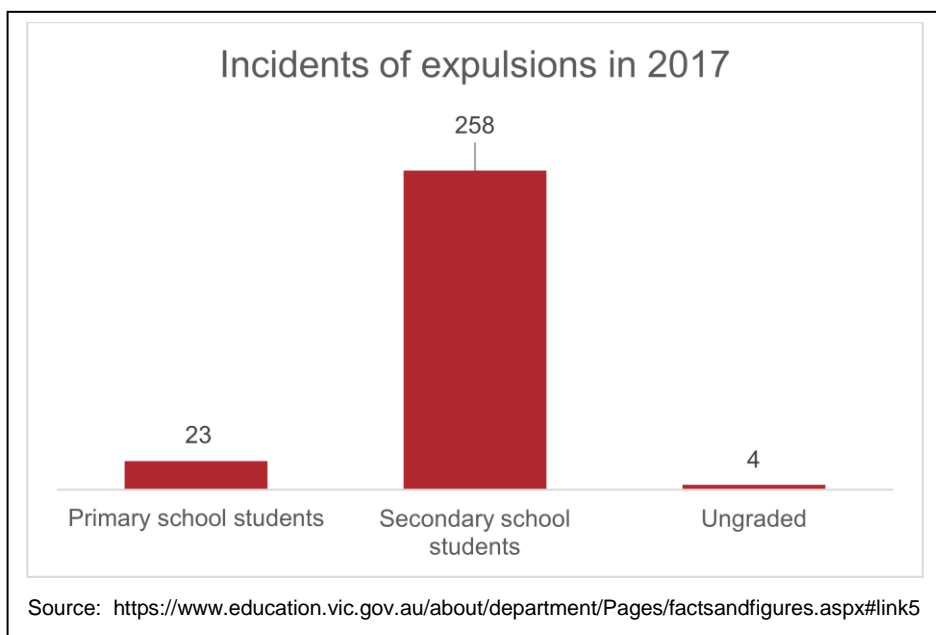
²³ The Client and Stakeholder Research is sent to every independent school. Any Catholic or Government school with an RTO or CRICOS registration is also included in the survey population. These figures should therefore be used with caution if making generalisations beyond the independent sector. The response rate for schools in 2018 was 51% (158 schools). Questions regarding the VRQA and the CSS were measured on a 4-point Likert scale (1 – fully agree, 2 – Mostly agree, 3 – Partially agree, 4 – Do not agree at all) but were reported as aggregated level of agreement.

A.4 EXPULSIONS REFORM BACKGROUND

Policy Context

On 14 August 2017, the Victorian Ombudsman tabled a report in Parliament on its *Investigation into Victorian government school expulsions*. The findings of this report detailed that, while there are relatively few formal expulsions within the system (285 in 2017 out of almost 1 million primary and secondary students), the impact for those students subject to an expulsion is profound. Expulsions tend to disproportionately affect students within vulnerable groups.

Figure 4: Incidents of expulsions in government schools



As part of the response to the Ombudsman, *Ministerial Order 1125 (Procedures for Suspension and Expulsion of Students in Government Schools)* was created and took effect on 16 July 2018. This Ministerial Order defines the grounds and process for suspensions, expulsions and appeals relating to expulsions of students in government schools.

While Ministerial Order 1125 only applies to the government sector, it presents a set of principles that reflect the recommendations of the Victorian Ombudsman's report on expulsions and contemporary good practice. Broadly, these principles include:

- Ensuring all children and young people are supported to remain engaged in education
- Procedural fairness – a fair and supportive expulsion processes with appropriate checks and balances at each stage
- Comprehensive support for all students, to address the underlying drivers of behaviour of concern in students
- Focus on supporting vulnerable cohorts of students who are a greater risk of poor education outcomes
- Importance of supported transition, in the instance an expulsion does occur, to ensure ongoing engagement in education.

School expulsions baseline data

There are currently no available quantitative measures.

A.5 APPRENTICESHIPS & TRAINEESHIPS BACKGROUND

Policy context

The VRQA regulates apprenticeships and traineeships (A&Ts) in Victoria in the following ways:

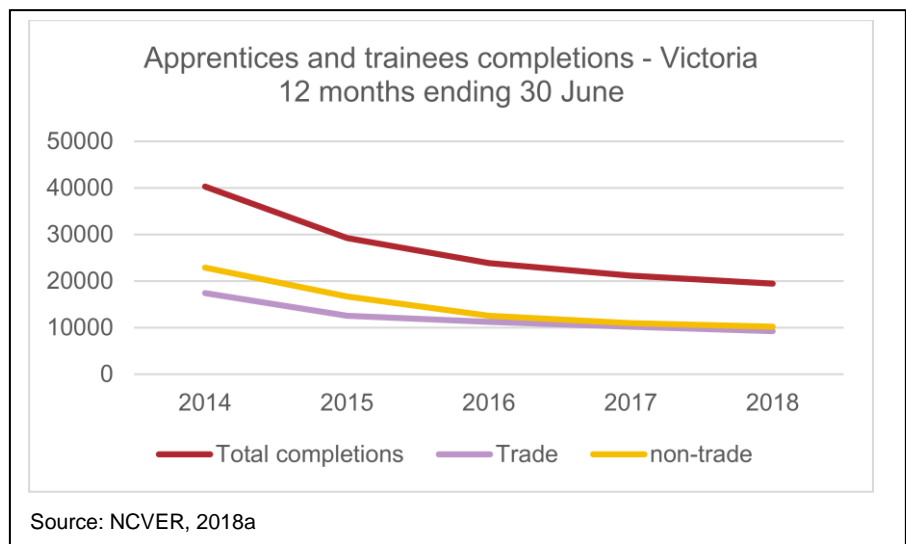
- approves and monitors employers of apprentices and trainees
- recognises and regulates Group Training Organisations (GTOs) in Victoria, including reviews and renewals under the National Standards
- determines what qualification are available as A&Ts in Victoria, including duration and probationary periods.
- approves, monitors and enforces training contracts between employers and A&Ts and authorises changes to those contracts, including through site visits by authorised officers employed by the VRQA and Victorian Apprenticeship Field Services (VAFS).

Under the ETR Act employers have obligations to provide A&Ts with a safe working environment, to ensure they receive adequate on-the-job training, and are given adequate time to attend off-the-job training. Equally, A&Ts have obligations as set out in the training contract (see ETR Act, S5.5.8 and S5.5.9). The VRQA regulates employers and apprentices and trainees in relation to training contract obligations (including employer obligations to provide skilled supervision and appropriate facilities). This includes GTOs.

GTOs are employers of apprentices and therefore must comply with employer obligations, including those set out in the ETR Act. Under section 5.5.6 of the ETR Act, an employer must obtain the VRQA's approval to enter into a training contract with an apprentice or trainee. The VRQA also regulates GTOs against additional responsibilities under the Commonwealth's National Standards for GTOs. The standards include induction and hosting arrangements that are inherent to the GTO

model. To oversee this regulatory responsibility, the VRQA works in a co-regulatory arrangement with the Australian Employment Network (AEN).²⁴

Figure 5: Apprentice and trainee completions



²⁴ AEN manage and host a self-assessment site for GTOs seeking recognition by the VRQA. This forms the first step in the registration process run by VRQA. VRQA have overall responsibility and conduct audits of GTOs. The auditing is contracted out by the VRQA.

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In late 2017, the Minister for Training and Skills, The Hon Gayle Tierney MP, launched the *Apprenticeship and Traineeship Taskforce Report*. The Taskforce was chaired by the VSC and comprised government, union, industry and business representatives. The report raised concerns about quality of delivery²⁵ and assessment for A&Ts, and the decreasing rate of completions.²⁶ Non-completions, considered a wasted investment, were linked to a mismatching of employer and apprentice/trainee expectations of the work and training arrangements.

The Taskforce recommended that the VRQA strengthen monitoring of traineeship pathways and re-introduce trade papers (abolished in 2013) to enable appropriate trade recognition for apprentices. In the May 2018 Budget, the Minister for Training and Skills announced that the Government would re-introduce trade papers in 2019 to ensure greater recognition of trade qualifications and give confidence to employers.

²⁵ The VRQA has advised that the quality of training delivered by RTOs were the main reasons for A&T related complaints received by the regulator in 2017-18, but the number of complaints are low and 3 out of 11 complaints related to 1 RTO. Other A&T related complaints are issues between employer and apprentices which are referred on as a formal dispute.

²⁶ For those that commenced an A&T trade occupation (mostly apprenticeships) in Victoria in 2013, only 40.1% completed compared to 47.1% Australia-wide (NCVER 2018b). Non-trade occupations (mostly traineeships) tend to have better completion rates (54.6% in Victoria for the 2013 cohort).

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A&T Baseline data

Table 13: A&T Baseline data (VRQA Annual Report)

EXPECTED OUTCOMES AND MEASURES (medium to long term)				
Measure	2016-17	2017-18	Direction	Source
<i>Improved understanding of training obligations of employers, apprentices, and others in the sector</i>				
Employer approvals	5,655	4,771	Decrease	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Campaign visits ²⁷	473	444	Decrease	Annual Report 2016-17: pg. 14 Annual Report 2017-18; pg. 18
Employer approvals revoked ²⁸	55	19	Decrease	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Number of A&T related complaints ²⁹	9	8	Decrease	Annual Report 2016-17: Table 17 Annual Report 2017-18; Table 18
Number of training contracts registered ³⁰	39,841	36,637	Decrease	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Apprentice cancellations	9,677	10,756	Increase	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Trainee cancellations	10,455	8,597	Decrease	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Formal A&T disputes listed	12	20	Increase	Annual Report 2016-17: Table 15 Annual Report 2017-18; Table 16
Delegate ordered cancellations or withdrawals ³¹	163	19	Decrease	Annual Report 2016-17: Table 15 Annual Report 2017-18: Table 16
A&T Field services activity – Planned visits ^{32,33}	3,615	3,596	Decrease	Annual Report 2016-17: Table 16 Annual Report 2017-18: Table 17
A&T Field services activity – Disputes ³⁴	61	61	No change	Annual Report 2016-17: Table 16 Annual Report 2017-18: Table 17
A&T Field services activity – Term adjustments ^{35,36}	127	127	No change	Annual Report 2016-17: Table 16 Annual Report 2017-18: Table 17

²⁷ A campaign visit is a work place visit that is conducted as part of a larger number of similar visits based on industry intelligence.

²⁸ Approvals to employ apprentices and trainees are revoked for reasons including not having staff with appropriate skills/knowledge to supervise apprentices or trainees, inappropriate worksite or facilities, or not providing apprentices or trainees with relevant work/training. Fluctuation is normal.

²⁹ The most prominent complaints were about the quality of training delivered by an RTO followed by issues between the employer and apprentice (these are then referred to as a dispute to AFS). One RTO contributed three of the eleven complaints.

³⁰ There were 76,879 active A&Ts as at 30 June 2018 and so approximately 48% of A&Ts were new commencements.

³¹ Delegate ordered cancellations occur as a result of an investigation campaign that can stretch over a year. While the investigative work is done in one year, the delegate decision can be occur in another year which helps to explain the difference between the 2016-17 and 2017-18 figures.

³² Planned visits are based on predetermined metrics that highlight increased risk of non-compliance.

³³ The number of planned visits are pre-determined. The VRQA and the Busy Group agree on a quarterly work plan that considers type of work and other factors such as complexity, region, qualification or time of year. The new contract signed September 2018 was designed to achieve reach and identify non-compliance.

³⁴ Most disputes relate to disagreements between the employer and the apprentice/trainee who seek to break the training contract and perhaps seek employment elsewhere. ETR Act 2006 requires that both parties agree or a decision is made by a VRQA Board delegate.

³⁶ Term adjustments can be extensions, credits (for time served) or reductions in contract duration (early completion part-time to full-time).

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Table 14: A&T Baseline data (VRQA Client and Stakeholder Research)

EXPECTED OUTCOMES AND MEASURES (medium to long term)				
Measure	2017	2018	Direction	Source
<i>Improved perceptions of interactions with the VRQA^{37 38}</i>				
Percentage of employers that are aware of the VRQA and what it does	26%	38%	Increase	Client and Stakeholder Research: A&T, Q1
Percentage of apprentices and trainees that are aware of the VRQA and what it does	20%	30%	Increase	Client and Stakeholder Research: A&T, Q1
Percentage of employers that would go to VRQA for clarification of an A&T matter	21%	21%	No change	Client and Stakeholder Research; A&T, Q2
Percentage of apprentices and trainees that would go to VRQA for clarification of an A&T matter	32%	20%	Decrease	Client and Stakeholder Research; A&T, Q2
Percentage of employers that would go to VRQA for a serious problem or dispute	23%	29%	Increase	Client and Stakeholder Research: A&T, Q3
Percentage of apprentices and trainees that would go to VRQA for a serious problem or dispute	41%	32%	Decrease	Client and Stakeholder Research: A&T, Q3
Percentage of employers that reported having their A&T contract obligations explained to them	93%	94%	Increase	Client and Stakeholder Research: A&T, Q4
Percentage of apprentices and trainees that reported having their contract obligations explained to them	92%	84%	Decrease	Client and Stakeholder Research: A&T, Q4
Percentage of employers that need support to understand and meet their training contract obligations	2%	16%	Increase	Client and Stakeholder Research: A&T, Q6
Percentage of apprentices and trainees that need support to understand and meet their training contract obligations	6%	22%	Increase	Client and Stakeholder Research: A&T, Q6

³⁷ The response rate in 2017 for A&Ts was 24% and employers 5%, with a strong response bias towards apprentices over trainees and employers of apprentices. In 2018, the response rate was 7% for A&Ts (a significant drop) and 7% for employers. Interpretation of these statistics should consider these limitations.

³⁸ 2017 Client and Stakeholder research employers (n=120), apprentices and trainees (n=100); 2018 Client and Stakeholder research employers (n=170), apprentices and trainees (n=172).