

To whom it may concern

**Could you please advise if or when the committee sent out a notice to the RTO national population with regard to an invitation to participate with feedback with regard to the Senate Inquiry into Industry Skills Councils?**

I found this following advice from a manager of a national compliance regulator who also found the inquiry accidentally, while looking for something else on the web.

***It leaves me to wonder how genuine a response the senate committee actually wants from ALL stakeholders or whether this inquiry is being conducted as a similar exercise to that undertaken by ISC's, where the training package outcome is what the ISC actually wants....then the NOC "rubber stamps" the recommended new training package.***

The consequential impact flows on from there with private and enterprise providers of the training usually being severely financially impacted with the resultant outcome.

I am one of many training providers who wonder if the constant and dramatic changes that occurs every couple of years are basically self-serving exercises that keeps money from the public purse flowing into the pockets of ISC's.

The Financial Services training package manager IBSA, progressed full steam ahead and took little if any advice from the submissions sent by the private RTO sector.

In many cases the RTO's, us included, were providing evidence supported fact to IBSA of where the wholesale proposed changes had the potential to water down the industry specific content and where it was severely diluting the essential regulatory requirement that is critical for this industry.

**The ISC for the Financial Services Training Package in NSW** was recently "rolled into another tender period" and if there was a call for competitive tendering for that role, it must have been done very quietly and I can think of a number of regulatory aligned agencies that would have been an excellent choice as the NSW ISC representative. A strong outcome would have been a situation where the ISC management was shared between two of the bigger industry sectors the Financial Services advice related regulator (this covers, banks and mutuals, financial advisors, insurance etc) and perhaps accounting (again a very large sector of the industry) could have shared the role as board members or in a shared CEO role.

The last knowledgeable and supportive NSW ISC for financial services was FSEAA. It was to FSEAA that many RTO's sought specialist training package advice. FSEAA personnel had the knowledge depth and capability, to expertly, address the performance standards required of an ISC and were frequently sought for advice by VETAB. I believe they eventually closed the business through lack of funding but I am not sure of the actual circumstances. I suspect that the training package would have been in expert hands if the contract had gone to FSEAA rather than IBSA.

IBSA have many training packages to manage and presumably managed well, but the financial services training package and industry, in retrospect, may have been better served if managed elsewhere.

Specialist knowledge is essential when given the responsibility of managing a training package for a nation and this should be considered at the time of appointment. ASIC are the financial service regulators but the ASIC training Register is managed under contract by LASA, who have a far better understanding of the necessary alignment between regulatory related training and the education requirements needed to make

that happen to a particular standard. Asic outsourced this important function and rely on specialist expertise to ensure a fair and equitable management process is in place.

FSEAA managed the register originally and the responsibility went back to ASIC for a time before it was tendered out again once the expertise requirement was identified ASIC.

*I manage a private Registered Training Organisation and have recently had both of the Training Packages that are the "life blood" of the business, go through a review with an outcome of significant change.*

The latest was the FNS10 Financial Services Training Package that was dramatically changed from the previous FSN04 package with serious financial impact on us as a business concern.

We will cope with the change and take yet another financial "hit" but when that expense is far greater than was actually necessary through excessive change, it creates pressure on the providers of critical education that is needed to continue to advance Australia through this millennium and grow our profile and recognition as a well regulated and educated nation.

We, like many other private RTO's, voiced our concerns at IBSA run forums and submitted our concerns in writing, yet we were largely ignored by IBSA as we weren't "industry", yet it is to us, as the RTO's providing the training, that industry turn to when they require their training and development solutions. We are in a well-informed position to be able to translate industry needs and contribute positively.

So many of the Expert Working Group (EWG) committee members selected by IBSA were not equipped through essential knowledge nor did some genuinely hold a mandate to speak on behalf of the industry they supposedly represented.

EWG members should be well versed with regard to broad and specific industry needs that have been researched from data gathered directly from industry and then be knowledgeable enough to know how and if that need can be adequately translated into a set of education standards that are then put into a training package designed to address those needs.

Contextualisation of learning material by us as an RTO's is frequently developed well beyond the limits of the training package in order to satisfy the genuine knowledge and skills requirements of our industry clients/students.

***I write this to you, outside of the closing date of the inquiry and wonder how many other private RTO's, with genuine concerns about how ISC's could be assisted to better serve ALL stakeholders, would have loved the opportunity to lodge their concerns.***

**OR**

***If they would have stayed silent as there is a great deal of disillusionment within the private RTO sector that has been voiced many times (at industry meetings) with regard to spending time and effort offering comment to have it bureaucratically ignored....thus apathy sets in and that is a cancerous, destructive virus that has no place in the fine education structure we have within Australia.***

If you have evidence of the private RTO population and FutureStaff is among the recipients, having been sent an advice of the Senate Enquiry and an invitation to

comment then I tender my apology for having missed a notice that was of vital importance but I look forward to your response to my email regardless.

Thank you for taking the time to read through my very real concerns regarding the ISC that I deal with, IBSA in relation to the review process for FNS10.

I take this opportunity to clarify that this is not intended as overall criticism of IBSA and it's operations as I have had very positive dealings with IBSA personnel for the majority of contacts since it's inception. The management of the last review of the FNS package however is the major concern.

*Kind regards*

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