



**NSW FOOD INDUSTRY TRAINING COUNCIL  
(NSWFITC)**  
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**Response to**

**SKILLS AUSTRALIA**

**Foundations for the Future**

**Draft Proposals for Future Governance, Architecture and  
Market Design for the National Training System**

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**About NSWFITC**

*The NSW Food Industry Training Council (NSWFITC) is the peak state industry training advisory body for the Food, Beverage and Wine Processing and Pharmaceutical Manufacturing industries.*

*In consultation with our 29 industry sectors, NSWFITC provides strategic advice to industry and government on the following key policy areas that impact the provision of vocational education and training:*

- *Apprenticeship and Traineeship arrangements*
- *Vocational Education and Training in Schools*
- *The development, review and implementation of relevant Training Packages*
- *Accreditation and registration processes in NSW for RTOs and courses*
- *Industry skill development research and initiatives*

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## 1.0 Response Overview

The NSW Food Industry Training Council (NSWFITC) thanks Skills Australia for the opportunity to respond to the position paper, *Foundations for the Future Draft Proposals for the Future Governance, Architecture and Market Design for the National Training System* (NTS). This initiative to introduce enhanced quality governance and clarification of roles and responsibilities provides the platform for necessary reform to ensure that Australia and our people can meet the work and learning challenges into the future.

In this paper, NSWFITC comments upon each Skills Australia recommendation in turn. Where a recommendation is not fully accepted, our position is outlined. A summary of responses is provided at section 3.0.

## 2.0 NSWFITC Proposed NTS Governance Framework

In response to the proposed *Proposed Governance Model for Australian Tertiary Education* presented at page 26 of the Skills Australia paper, NSWFITC suggests a Governance Framework for the National Training System at Attachment 1 (separate pdf attached with associated jargon buster at Annexure 1), that provides clear roles and responsibilities for the Vocational Education and Training (VET) stakeholders at national and state levels encompassing:

- **Decision-making** – COAG; Commonwealth Minister
- **Vision and policy** – MYCEETYA; DEEWR, State Ministers based on high-level strategic, evidence-based industry advice received from Skills Australia
- **Leadership** – Skills Australia seeks advice from the industry leaders Peak Industry Council or Group, comprised of representatives nominated for two year terms from each of the following organisations:
  - *Peak Industry Associations Committee* (Peak IAC to include the major national peak industry associations ACCI, AIG, ACTU, NFF, Australian Retailers Association, Australian Food & Grocery Council etc)
  - *Industry Skills Councils Chairs and Executives Committee* (ISC CEC: all Chairs and Executive Officers of the 11 Industry Skills Councils)
  - *ITAB Chairs Committee* (ITAB CC: the 22 Chairs voted from across all state Industry Training Advisory Bodies with rotating industry sectors and states)
  - *TVET* (nominated Board and staff members from across all service areas)
  - *RTO Peak Committee* (RTO PC: Australian TAFE Directors, ACPET and ACVIC)
  - *Other Government Agency Committee* (Australian Departments or Agencies that cover national licensing, regulation, security, industry codes etc, such as Food Standards Australia New Zealand (FSANZ))

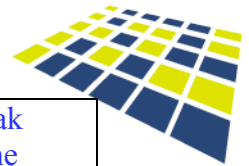


- **Quality** – National Training Information Service (NTIS), National Quality Council (NQC) and a new National Quality Appeals Panel (NQAP) being an independent body to hear complaints and appeals about Training Package and course development, RTO registrations, NTS learning products etc
- **Research** - NCVER
- **Regulation** – National Audit and Registration Authority (NARA), State Registering Bodies, Trade Recognition Australia, NOOSR
- **Implementation** – DEEWR and STA program management, RTO delivery supported by TVET product services (roll the Australian Flexible Learning Framework’s LORN repository into TVET services so all VET sector learning resources are registered and accessible from the TVET repository)
- **Industry advice** – the source of comprehensive, independent, bi-partite national and state industry intelligence, advice and evidence to inform research, the development of Training Products and implementation policies, programs, strategies and quality assurance, will be the collaborative National Industry Advisory Network, comprised of the:
  - *Industry Skills Councils (ISCs)*
  - *State Training Industry Advisory Bodies (ITABs)*
  - *National RTO Advisory Network (NRAN)* of individual public and private providers

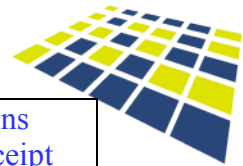
### 3.0 Summary Position on Recommendations

NSWFITC accepts the Recommendations as shown as agreed (in blue) at Section 4. Where there is not full concurrence with a particular recommendation, the following comments are offered for consideration:

Skills Australia Recommendation	Comment	NSWFITC Recommendation
i. the Council of Australian Governments establishes a realigned Ministerial Council for Tertiary Education for training, higher education and employment participation	Agreed in Principle	i. the realigned Ministerial Council for Tertiary Education is established as a sub-set of MYCEETYA.
ii. the Ministerial Council for Tertiary Education formalises new arrangements for industry advice as a central feature of the governance framework	Agreed in Principle	ii. the Ministerial Council for Tertiary Education formalises new arrangements for industry advice as a central feature of the governance framework including



<p>including:</p> <ul style="list-style-type: none"> <li>• establishment of a Peak Industry Advisory Group of employer and employee representatives to meet biannually with Ministerial Council to represent their views on ways to promote skill development and utilisation</li> <li>• independent evidence and advice on strategic policy, planning and investment decisions for the tertiary education sector drawn from a national network of industry advice and co-ordinated through Skills Australia</li> </ul>		<ul style="list-style-type: none"> <li>• establishment of a Peak Industry Council as the high-level, strategic industry leadership group with comprehensive, nominated representation sourced from across all industry and RTO stakeholders. The Peak Industry Council will be facilitated by Skills Australia and meet biannually with the Ministerial Council to progress the National Training System (NTS)</li> <li>• establishment of a formally structured National Industry Advisory Network to provide independent evidence and advice on strategic policy, planning and investment decisions for the tertiary education sector. This Network will initially be drawn from the Industry Skills Councils, State Industry Advisory Bodies and National RTO Advisory Network, and co-ordinated through Skills Australia.</li> </ul>
<p>v. Australian Governments develop an investment framework for the tertiary sector to optimise the effective use of public and private expenditure on skills, which plans for and ensures this investment meets national priorities. This framework should be based on more comprehensive and consistent data on the scale and nature of</p>	<p>Conditional Acceptance</p>	<p>v. Australian Governments develop an investment framework for the tertiary sector to optimise the effective use of public and private expenditure on skills, which plans for and ensures this investment meets national priorities. This framework should be based on comprehensive and consistent data on the scale and nature of employers' expenditure on training as derived from</p>



employers' expenditure on training		annual Tax submissions from employers in receipt of government funding within the given financial year. Where Tax documents have not been lodged for the designated year, those employers in receipt of government VET funding must provide a statutory declaration of their expenditure on training for the required period. Employers meeting a specified contribution will be eligible for a tax deduction.
vi. Australian Governments adopt a purchasing approach as the preferred model for market reforms in VET and future investment in skills	Rejected	vi. Australian governments adopt a nationally consistent model for funded skills programs that is not simply an RTO purchasing model, but a managed brokerage model incorporating STA-managed purchasing <i>by employers</i> referred through a funded industry brokerage service that matches priority businesses with approved RTOs.
All other recommendations	Agreed	Further comment provided under recommendation headings.



## 4.0 Skills Australia Recommendations i – xvi ::

### 4.1 Setting a unified national vision – Recommendations i - iii (Recommendations Section 3.4)

It is recommended that:

#### **AGREED IN PRINCIPLE**

- i the Council of Australian Governments establishes a realigned Ministerial Council for Tertiary Education for training, higher education and employment participation

#### **AGREED IN PRINCIPLE – see Attachment 1: NSWFITC Proposed Governance Framework**

- ii. the Ministerial Council for Tertiary Education formalises new arrangements for industry advice as a central feature of the governance framework including:
  - establishment of a Peak Industry Advisory Group of employer and employee representatives to meet biannually with Ministerial Council to represent their views on ways to promote skill development and utilisation
  - independent evidence and advice on strategic policy, planning and investment decisions for the tertiary education sector drawn from a national network of industry advice and co-ordinated through Skills Australia

#### **AGREED**

- iii. Australian Governments agree to establish national statutory arrangements for VET regulation and quality led by an independent board with the expectation that over time these regulatory arrangements align and eventually integrate with those for higher education.

#### **Comments on Recommendations i - iii:**

- i. NSWFITC proposes that MYCEETYA is the relevant Ministerial Council in the new NTS Governance Framework as the interfaces between the school, Vocational Education and Training (VET) and Higher Education (HE) has become increasingly blurred with VET delivery occurring across all three sectors. Refer to the NSWFITC proposed NTS Governance Framework at Attachment 1. It is recommended that the proposed Ministerial Council for Tertiary Education is formed as a sub-set of MYCEETYA.
- ii. For the NTS to transform into a mature, operationally sound system delivering quality skills development relevant to industry needs to grow Australia's economy, it is necessary for all the roles and responsibilities to be clearly defined, structured and funded at every management level. The NSWFITC Framework proposes increased formal opportunities for industry leadership and consultation beyond the Industry Skills Council model, to allow greater coherence and transparency of stakeholder advice prior to government decision-making.





The NSWFITC Framework proposes four levels of industry engagement to ensure that industry intelligence and advice underpinning the NTS is comprehensive, current, evidence-based, validated and future-focussed:

- **ITABs** – state advice (*evidence-based, local metropolitan, regional and rural, collected bi-annually according to common, defined measurement indicators and reporting requirements to STAs*)
- **Industry Skills Councils** – national advice (*scenario-based, big-picture advice, captured bi-annually from national enterprises, statistics and research, according to common, defined measurement indicators and reporting requirements to DEEWR*)
- **National Industry Advisory Network** – comprehensive, integrated industry and sector-specific advice reported annually to Skills Australia (*this stakeholders' collaborative forum will co-ordinate and test the advice received from ITABs and ISCs, by sourcing wider industry input, evidence and validation from relevant parties, including identified National Industry Associations and the National RTO Advisory Network*)
- **Peak Industry Council** - high-level, strategic industry intelligence and advice reported bi-annually to the Ministerial Council (*the representative peak industry advisory group facilitated by Skills Australia*)

iii. NSWFITC supports the formation of independent, national statutory arrangements for VET regulation and quality to ensure:

- nationally consistent RTO registration, monitoring and audit services
- Training Package development and continuous improvement is facilitated by ISCs according to a national code with a well-defined methodology such as:
  - ♣ industry sector functional skills progression analysis by nominated industry professionals (nomination process specified)
  - ♣ vocational jobs analysis by nominated industry professionals
  - ♣ competency standards content mapping by second group of nominated industry professionals
  - ♣ qualifications content mapping by ISCs
  - ♣ Training Package re-development by ISCs
  - ♣ industry review through independent, state and national enterprise consultation
  - ♣ Training Package final edit
  - ♣ Industry validation by authorised, representative panel

*(Note: It is anticipated that the NQC inquiry into 21<sup>st</sup> Century Training Products will address the issue of future Training Package development as the current system is imploding. NSWFITC suggests that Training Packages be renamed **Industry Qualification Standards**, eg **NTIS No. Australian Meat Industry Qualification Standard***





## 4.2 Providing the evidence base for policy and reform – Recommendation iv (Recommendation Section 4.3)

It is recommended that:

### AGREED

- iv. a nation-wide network of skills planning and industry advisory arrangements be formalised in the new governance framework. This network will reflect the relationship between Industry Skills Councils, their state counterparts, and state training authorities. The network will provide the evidence and advisory base through Skills Australia to Ministerial Council for skills planning and investment decisions

### Comments on Recommendations iv:

Please refer to NSWFITC suggested Governance Framework at Attachment 1 and earlier comments on Recommendations i - iii.

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## 4.3 Investing wisely and effectively in skills and workforce development – Recommendations v - (Recommendation Sections 5.2, 5.3)

It is recommended that:

### CONDITIONAL ACCEPTANCE

- v. Australian Governments develop an investment framework for the tertiary sector to optimise the effective use of public and private expenditure on skills, which plans for and ensures this investment meets national priorities. This framework should be based on more comprehensive and consistent data on the scale and nature of employers' expenditure on training

### REJECTED

- vi. Australian Governments adopt a purchasing approach as the preferred model for market reforms in VET and future investment in skills

### AGREED

- vii. Australian Governments agree to the proposed managed market reform approach to achieve greater choice and contestability as the basis for intergovernmental agreement together with:
  - ♣ implementation of a new national regulatory framework through an independent statutory body
  - ♣ continuing to ensure the ongoing role of public providers and their agency in regional economic development, particularly in thin markets
  - ♣ greater industry engagement in States' skills investment decisions with governance arrangements to reflect this and
  - ♣ improved consumer information to assist choice



### **Comments on Recommendations v - vii:**

v. It is noted that only employers in receipt of government training incentives above a designated amount should be required to submit accurate data within the given financial period, on their total training expenditure, including both in-house and government funded workforce development. This condition aims to reduce the compliance burden on SMEs.

To ensure procedural fairness, employers' in-kind contributions to training must be recognised in this formulation, for instance, costs associated with employee time spent in face-to-face training requiring shift replacement, training co-ordination, off-site meetings etc.

The data should be supplied to the Australian Tax Office as part of annual tax assessments, with employers who meet certain conditions being eligible for a tax break, for instance, where training expenditure exceeds a nominated net value.

vi. NSWFITC strongly rejects the adoption of an RTO purchasing model as it allows RTOs to drive the skills market and unless there are very tight quality assurance mechanisms in place apart from AQTF audit compliance measures, it becomes impossible to ensure that:

- the right businesses receive the right skills at the right location as RTOs control the delivery market;
- workforce development delivers quantifiable benefits to each business, as often VET clients do not know what to expect, or do not wish to comment on the poor quality of an RTO's implementation strategies, due to their lack of knowledge or experience of the NTS so they simply opt out of accredited training;
- RTOs are addressing skills development with appropriate content and strategies as at present there are no mandatory requirements on trainers/assessors to maintain industry currency by undertaking ongoing work experience, Professional Development, membership of industry associations, interaction with ISCs/ITABs etc.

NSWFITC suggests a different model for funded programs should be introduced where employers are referred through an industry brokerage service to the government-managed market for training places. The service matches businesses with approved RTOs that meet certain performance criteria such as industry-specific professional development and independent client monitoring.

*Note:* To increase quality outcomes for existing worker skills development, in terms of agreed business targets (increased productivity, competitive advantage etc), NSWFITC has developed a Business Improvement Skilling (BIS) Model for RTOs. It is interesting that employers have enthusiastically embraced the model as they see direct, quantifiable outcomes, but RTOs have been reluctant because of perceived extra work, until they actually experience the results where employees meet workplace performance targets and all-round satisfaction is witnessed from the employer, employee and assessor. Refer to Attachment 2 (separate attachment).



vii. With respect to the recommendation for “*greater industry engagement in States’ skill investment decisions with governance arrangements to reflect this and improved consumer information to assist choice*”, it is noted that our proposed Industry Brokerage Model presented at Recommendation vi for the preferred model for market reforms in VET aims to address this matter.

However, there needs to be nationally cohesive and funded arrangements for state industry advisory body arrangements to support the proposed Brokerage model. Since the Commonwealth funding element for state based industry advisory arrangements ceased in the 2002 budget, the NSW ITABs have existed on only \$50 000 per annum, without increase over the period nor any significant complementary funding from the state government. Therefore during these past seven years, ten of the original twenty NSW-based ITABs have folded due to financial difficulty. Now it is feared that internal and external pressures will result in very limited independent, state-based industry advisory services being available in NSW into the future. In such scenarios, industry leadership of the NTS remains simply rhetoric plus the need for such bodies to earn substantial additional income for survival, may lead to vested interests coming into play.

#### 4.4 Regulating and ensuring quality services and products – Recommendations viii - xiv (Recommendations Section 6.1, 6.2.2, 6.2.5)

It is recommended that:

##### AGREED

viii. Australian Governments undertake legislative reform to establish an independent national regulatory body, absorbing the functions of State and Territory regulatory authorities and reporting to Ministerial Council

##### AGREED

ix. Australian Governments agree the national VET regulatory body be responsible for the registration and audit of VET providers, final endorsement of training products and dissemination of provider performance information on service quality and outcomes to assist users

##### AGREED

x. Australian Governments agree in principle that the national VET and higher education regulatory bodies and the Australian Qualifications Framework Council would merge as the alignment of the new regulatory arrangements mature and become more stable.

##### AGREED

xi. the proposed national VET regulator, as a priority, strengthens AQTF risk management protocols, scope for interventions and treatment of sanctions to enable rapid national response to poor RTO performance

##### AGREED

xii. Australian governments introduce a more consistent national framework for purchasing contracts with agreed core standards– focusing on RTO



performance requirements and evidence samples, while recognising States/Territories' need for unique contractual specifications

#### **AGREED**

- xiii. Australian Governments introduce a consistent national approach to checking the financial viability and track record of RTOs as quality providers, as a standard requirement for their eligibility for public funding

#### **AGREED**

- xiv. the proposed national VET regulator work with States and Territories:
- to develop a national framework and agreed core standards for purchasing contracts
  - to advise on consistency of purchasing and performance standards and mechanisms for integrated AQTF compliance and purchasing auditing approaches to be implemented by States.

#### **Comments on Recommendations viii - xiv:**

NSWFITC accepts Recommendations viii – xiv, with strong endorsement for the proposals to strengthen timely responses to poor RTO performance. Tighter new contractual requirements for RTOs in receipt of government funding are very welcome.

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#### **4.5 Using information for system performance and client choice – Recommendation xv (Recommendation Section 7.5)**

It is recommended that:

#### **AGREED**

- xv. The proposed national VET regulator, working closely with the National Centre for Vocational Education Research, undertakes the role of system performance evaluator and makes provider performance and outcomes information publicly available to assist users and inform quality reforms

**No further comment on Recommendation xv.**

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#### **4.6 Providing training services that meet needs – Recommendation xvi (Recommendation Section 8.5.1)**

It is recommended that:

#### **AGREED**

- xvi. State Governments undertake appropriate governance reforms to increase the operational flexibility and business autonomy of public providers to stimulate greater diversity in service provision, and to ensure they are strongly positioned in an increasingly competitive market to contribute to COAG and Bradley targets.



**No further comment on Recommendation xvi.**

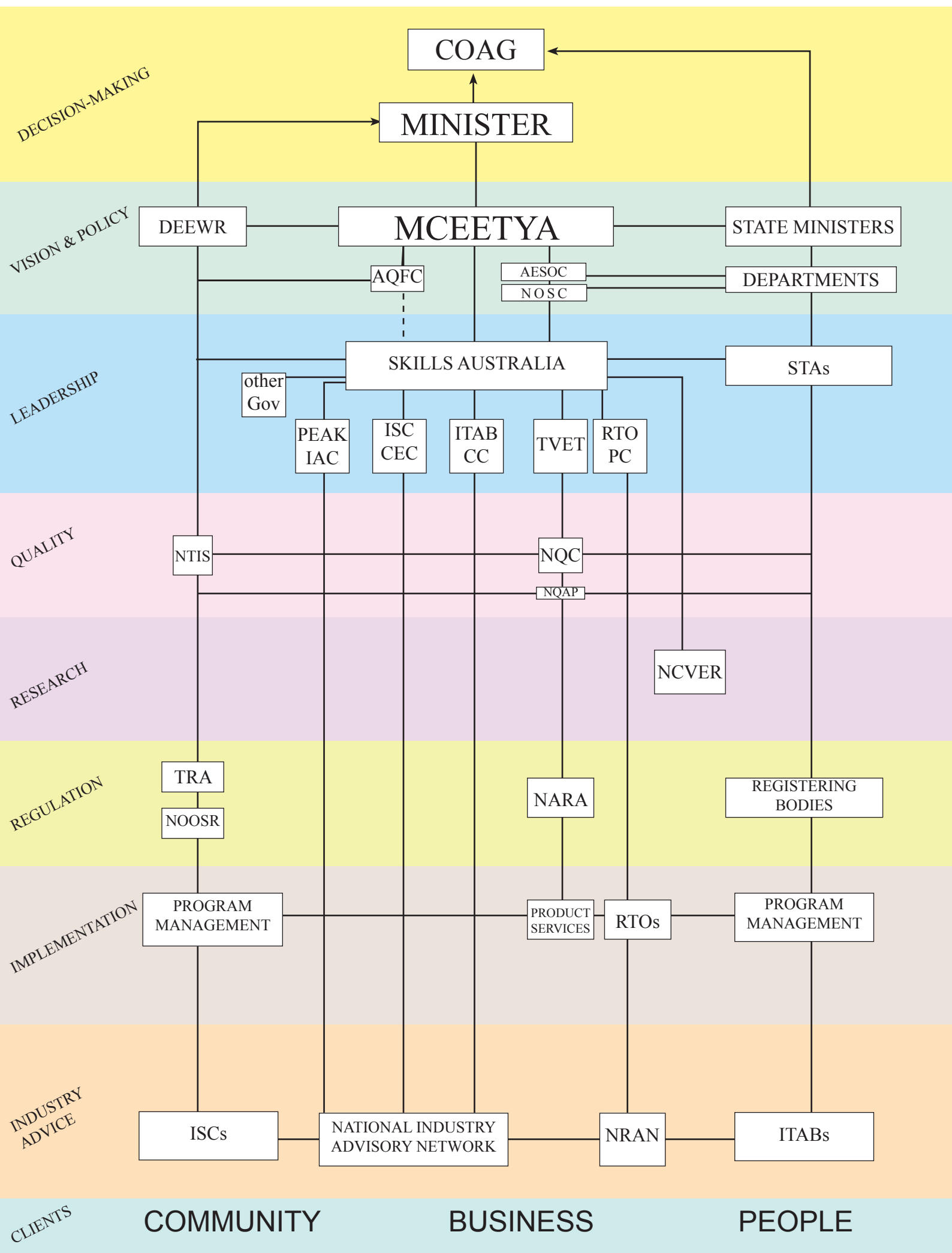
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## **5.0 Conclusion**

NSWFITC believes that today, the Australian Government holds a unique opportunity to reform the National Training System into the world's leading vocational and education system.

We welcome immediate change to the NTS Governance Framework as discussed. The reshaped NTS will provide true, representative industry leadership and stakeholder partnership, with clearly defined roles and responsibilities at each management level, encouraging visionary implementation to achieve high quality outcomes for businesses and individuals to drive Australia's future.

# National Vocational Education and Training System Proposed Governance Framework





## ANNEXURE 1

### NSWFITC Proposed NTS Governance Framework

#### Jargon Buster

(in model order)

**COAG:** Coalition of Australian Governments, [www.coag.gov.au](http://www.coag.gov.au)

**MYCEETYA:** Ministerial Council on Education, Employment Training and Youth Affairs with responsibility for pre-primary education, primary and secondary education, vocational education and training, higher education, employment and linkages between employment/labour market programs and education and training, adult and community education, youth policy programs and cross-sectoral matters.

**DEEWR:** Australian Government Department of Education, Employment and Workplace Relations, [www.deewr.gov.au](http://www.deewr.gov.au)

**AQFC:** Australian Qualifications Framework Council, established in May 2008 to provide advice to MCEETYA on the Australian Qualifications Framework (AQF) to ensure it is nationally and internationally robust and supports flexible cross-sectoral linkages and pathways.

**AESOC:** MCEETYA is supported by a group of senior officials who meet regularly as the Australian Education Systems Officials Committee (AESOC); chairing of meetings rotates across jurisdictions and follows the Ministerial Council's chairing cycle.

**NOSC:** membership consists of the CEOs of the Australian and state government departments responsible for training; chaired by the Secretary of DEEWR.

**Skills Australia:** is an independent statutory body which provides recommendations and advice to the Australian Government Minister on the investment of public funds in training, current and future demand for skills, workforce development and training system reform.

**State Departments:** are the state jurisdictional authorities for VET as follows:

- ACT: Department of Education and Training
- NSW: Department of Education and Training
- NT: Department of Employment, Education and Training
- Queensland: Department of Education, Training and the Arts
- SA: Department of Further Education, Employment, Science and Technology
- Tasmania: Skills Tasmania
- Victoria: Skills Victoria
- WA: Department of Education and Training

**STAs:** State Training Authorities are the statutory representative industry authority as below:

- ACT: Nil – delegate is the Chief Executive of ACT Department of Education and Training
- NSW: NSW Board of Vocational Education and Training (BVET)





- NT: Nil – delegate is Minister’s Round Table on Employment and Training
- Queensland: Training and Employment Recognition Council
- SA: Training and Skills Commission
- Tasmania: Skills Tasmania
- Victoria: The Victorian Skills Commission
- WA: The State Training Board

**PEAK IAC:** Peak Industry Associations Committee – ACCI, ACTU, AIG, Australian Business Council, Australian Retailers Association (ARA), National Farmers Federation (NFF) with Chair and Minutes Secretary rotating annually.

**ISC CEC:** Industry Skills Councils’ Chairs & Executive Officers Committee comprised of 22 members (that is, all Chairs and EOs) with Chair and Minutes Secretary rotating annually.

**ITAB CC:** State Industry Training Advisory Bodies Chairs Committee – 22 members, representative of states and industries, to be elected annually with Chair and Minutes Secretary rotating annually.

**TVET:** Technical and Vocational Education and Training Australia Limited is a ministerial company owned by the Commonwealth, State and Territory Ministers responsible for training. It was established to provide responsive and high quality services to support the national training system.

**RTO PC:** Training Providers Peak Committee with representatives from ACPET, ACVIC, ERTOA, TAFE Directors Australia, SME RTOs, Australian Institute of Training and Development (AITD) with Chair and Minutes Secretary rotating annually.

**NTIS:** National Training Information Service ([www.ntis.gov.au](http://www.ntis.gov.au))

**NQC:** National Quality Council oversees quality assurance and ensures national consistency in the application of Australian Quality Training Framework (AQTF) standards for the registration and audit of training providers. It also oversees the endorsement of training packages.

**NQAP:** National Quality Appeals Panel - a new formal appeals avenue for unresolved matters regarding registering and audit bodies (state registering bodies, NARA, Trade Recognition Australia, NOOSR) as well as Training Package development, continuous improvement or endorsement processes.

**NCVER:** National Centre for Vocational Education Research. A proposed new role is to maintain a register of all VET research or related projects undertaken across Australia with government monies, regardless of the program area.

**TRA:** Trade Recognition Australia is a nominated assessment authority for a number of occupations in the Skilled Migration Program under the [Migration Regulations 1994](#). TRA issues Australian Recognised Trade Certificates (ARTCs) to eligible Australian residents under the [Tradesmen’s Rights Regulation Act 1946 \(the TRR Act\)](#)

**NOOSR:** National Office of Overseas Skills Recognition, a division of Australian Education International (AEI) within the Australian Department of Education, Employment and Workplace Relations (DEEWR). NOOSR provides official information and advice on the comparability of overseas qualifications with Australian qualifications. NOOSR aims to help overseas-qualified people to work and study in Australia.



**NARA:** National Audit and Registration Agency provides audit and registration services for registered training organisations (RTOs) that operate in more than one Australian state or territory.

**Registering Bodies:** State and territory registering and accrediting bodies as below:

- ACT: Accreditation and Registration Council
- NSW: Vocational Education Training Accreditation Board (VETAB)
- NT: Department of Employment, Education and Training
- Queensland: Training and Employment Recognition Council
- SA: Department of Further Education, Employment, Science and Technology
- Tasmania: Tasmanian Qualifications Authority
- Victoria: Victorian Registration and Qualifications Authority
- WA: Training Accreditation Council

**Product Services:** TVET division including Australian Training Products and AShareNet Licencing System. Refer to [www.productservices.tvetaustralia.com.au](http://www.productservices.tvetaustralia.com.au).

**ISCs:** Industry Skills Councils, 11 national privately registered companies funded and declared by the Australian government to provide advice to Skills Australia, government, enterprises and the vocational education and training sector on skills and workforce development needs. They collaborate through the ISCs Forum on issues with wider implications for Australian industry generally.

**National Industry Advisory Network:** The network encompassing all the ISCs, national Peak Industry Associations and state ITABs and including industry specific sub-groups aligned with ISC coverage to facilitate a national professional conversation on VET issues.

**NRAN:** National RTO Advisory Network – will offer a forum for RTO interaction and dialogue on key VET matters.

**ITABs:** Industry Training Advisory Bodies are generally independent, bipartite, privately registered companies, funded by state governments for the provision of state-specific, high-level strategic industry advice to inform VET policy, research, program development and implementation. Currently, such arrangements vary from state to state with limited alignment and/or formal interaction with ISCs.

# Workforce Development Business Improvement Skilling (BIS) Model

