

Our Ref: 104416

28 February 2011

Committee Secretary  
Senate Education, Employment and Workplace Relations Committee  
PO Box 6100  
Parliament House  
CANBERRA ACT 2600

**National Vocational Education and Training Regulator Bill 2010 (2011),  
National Vocational Education and Training Regulator (Transitional Provisions)  
Bill 2010 (2011) and National Vocational Education and Training Regulator  
(Consequential Amendments) Bill 2011**

I am writing in response to the Senate Inquiry into the above proposed bills on the establishment of the National VET Regulator.

As the National Centre for Vocational Education Research (NCVER) is the responsible agency for the national vocational education and training (VET) data collections we have kept our comments specifically to data collection and data requirement provisions.

NCVER has been arguing for a number of years that a major deficiency in the national collections needs to be addressed. Currently we have data on training activity and completions for publicly funded provision, but not the fee paying students of private providers. The argument for a national collection covering all activity of some 5,000 registered training organisations (RTOs) is twofold. First, governments need to understand the entirety of provision in order to make informed resource decisions and develop policy. The second argument is that accurate, consistent and comprehensive data on provision and outcomes of VET should be a key part of any national quality assurance arrangements. A comprehensive data collection would also ensure that the important contribution of private providers is properly recognised.

Current arrangements regarding data provision are rather confused. The recently revised standard for registration developed by the National Quality Council (AQTF 2010) partly lays the groundwork for a comprehensive data collection. Condition 6 states "*The RTO must have a student record management system in place that has the capacity to provide the registering body with Australian Vocational Education and Training Management Information System Standard (AVETMISS) compliant data*". This falls somewhat short of ensuring this information is submitted to the national VET data collection and has confused RTOs and Registering Bodies in relation to what information must be supplied and how.

The National VET Regulator Bill provides the mechanism to effect a comprehensive data collection, noting that it is contingent on Ministers agreeing to the data provision requirements. As such, NCVER would see the *data provision requirements* as a mechanism for mandating certain aspects of the existing national data standard for training activity as a condition of registration for Registered Training Organisations.

We note under *Functions of the National VET Regulator* one of the roles of the national VET regulator is "to collect, analyse, interpret and disseminate information about vocational education and training". We anticipate that this is to only collect additional information not available from the national data collections. It is clearly preferable to collect data once, even though it may be used for various purposes. This would not rule out the National VET Regulator collecting some data that might not find its way into a national collection - data on financial viability may well be of interest to the regulator but would very unlikely to be part of a national data collection.

However, our presumption is that the national VET regulator would work with NCVER in terms of collecting data that are properly part of the national data collection, and we trust the clauses on *Disclosure of Information by the National VET Regulator* provide a simple framework for this to occur. In this regard the national VET data protocols, determined by Ministers, already allow NCVER to pass provider level data to the national VET regulator.

NCVER would be pleased to work with the National VET Regulator, the National Standards Council and other key stakeholders in providing advice to Ministers on what constitutes *appropriate data provision*.

Yours sincerely

Tom Karmel  
Managing Director