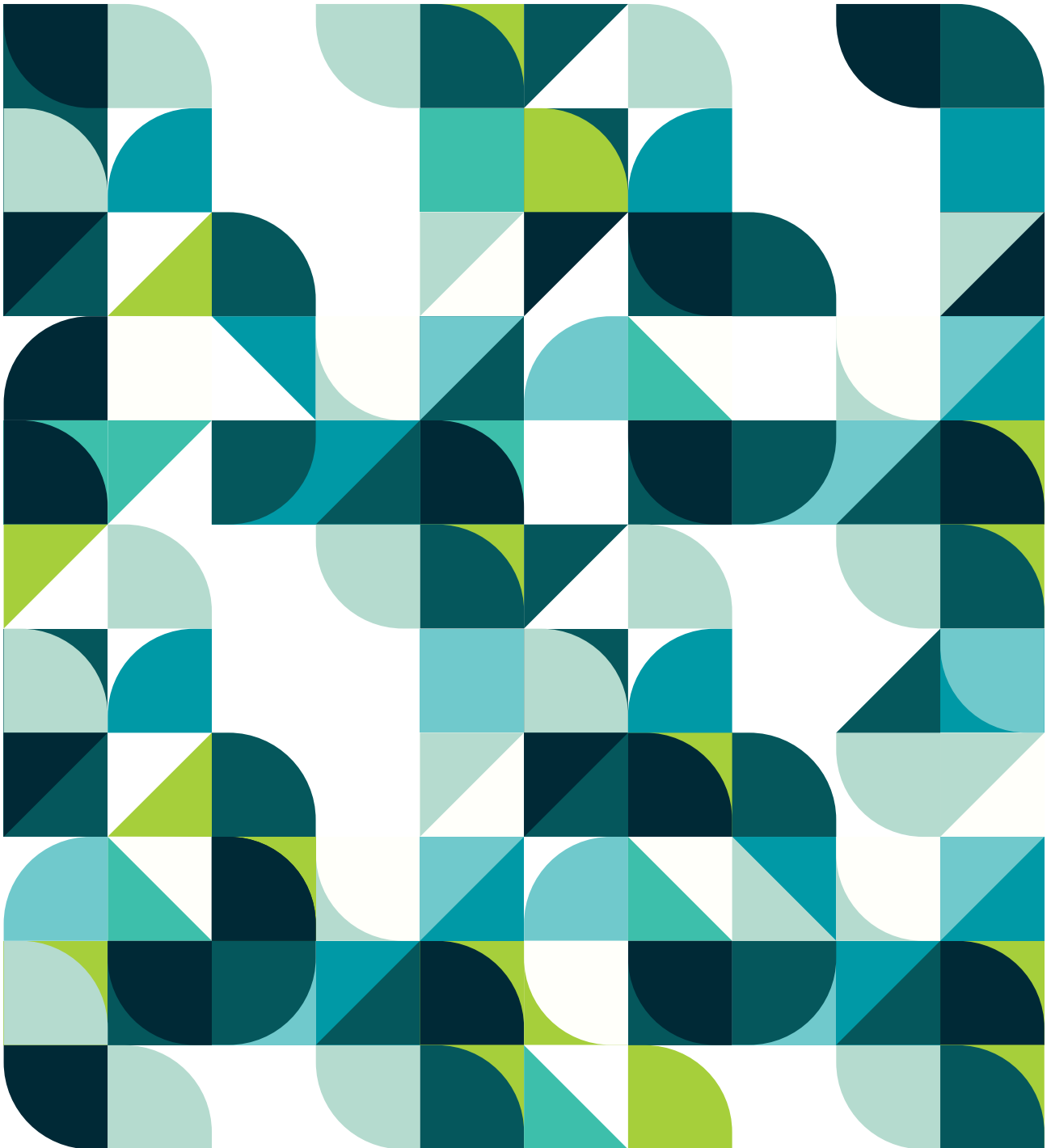


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Evidence Guide to support the
NATIONAL STANDARDS
for Group Training Organisations



1 Introduction

The apprenticeship or traineeship pathway

High-quality vocational education and training (VET) is vital to Australia's economic prosperity. It provides Australians with the skills and knowledge they need to make a productive contribution to the national workforce. Industry expectations of the skills and knowledge of VET graduates are expressed in training packages and VET accredited courses, with delivery being the responsibility of Registered Training Organisations (RTOs).

One pathway for achieving a VET qualification is through an apprenticeship or traineeship, involving a mix of structured on-the-job and off-the-job training. The theory and practice nature of this mode of training differs from the achievement of a qualification in a fully institutional setting.

The apprenticeship model combines a contract of employment and a contract of training. It involves two legislative/regulatory systems—the vocational education and training system and the industrial relations system.

The function of the legislative framework is to specify the circumstances in which an apprenticeship or traineeship can be created. This is provided for in State and Territory VET legislation. The creation of an apprenticeship or traineeship under this legislation means that the employer can access the award provisions pertaining to training wages, as provided for in the Australian Government's Fair Work legislation, and also access the various forms of support (often financial) provided by governments. The training arrangements are set out in an Apprenticeship/Traineeship Training Contract and signed by both the employer and the apprentice/trainee, as the employee. The two parties are also responsible for selecting the RTO responsible for the delivery of training.

The achievement of a qualification through this mode provides the public with an assurance that the person not only possesses a theoretical understanding but has also demonstrated competency on the job. In some instances, it also provides for those qualifying as a skilled tradesperson to become licensed to undertake specific tasks within an occupation.

Group Training Organisations

In Australia, the employment of apprentices/trainees is undertaken either directly by an employer or via group training arrangements. Group Training Organisations (GTOs) have as their core purpose to employ apprentices and trainees under a Training Contract and place them with host employers. They undertake the employer responsibilities for the quality and continuity of the apprentices' and trainees' employment and training. They also manage the additional care and support necessary to facilitate the successful completion of the Training Contract.

GTOs take a multitude of forms; they are diverse in size, structure, governance and the scope and volume of services provided. Most GTOs are not-for-profit organisations but some are for-profit. Some GTOs are stand-alone organisations whilst others are structured as one element within a larger organisation that offers a range of services, such as training. Some GTOs operate nationally across a number of states and territories whilst others operate within one state or territory or operate as a community-based provider. Some focus their activity across a wide range of industry areas whilst others have a single industry focus. Within these organisations responsibility for compliance will also vary, with staff in many small organisations often being responsible for a range of activities, including compliance, whilst larger national organisations often employ compliance focused teams with specific compliance expertise and training.

The purpose of the draft revised National Standards for GTOs

The purpose of the *National Standards for Group Training Organisations (2017)* (the Standards) is to ensure nationally consistent, high-quality services are provided by GTOs in carrying out their core role and in doing so, operate ethically, with due consideration of apprentice, trainee and host employer needs, and enhance the reputation of group training as a model of employment and training within the apprenticeship and traineeship system.

The Standards have been structured to reflect the key outcome for a GTO to develop an apprentice/trainee to become a skilled worker who has completed a recognised qualification. To achieve this quality outcome a GTO needs to focus on three key elements:

- recruitment, employment and induction;
- monitoring and supporting apprentices and trainees to completion;
- maintaining a sustainable business that is well governed and administered.

GTOs must comply with the Standards in order to be registered. State and territory training authorities are responsible for registering GTOs in their jurisdictions and monitoring their compliance with the Standards. Registered GTOs are published on the Group Training National Register website (www.australianapprenticeships.gov.au/group-training) and are entitled to use the Group Training logo. Once registered, GTOs are eligible to apply for funding available for GTOs from Australian Government or State or Territory Government programs.

The national quality framework for group training was established in 2003 with the implementation of the first National Standards for GTOs, approved by all State and Territory Governments and the Australian Government. The Standards were accompanied by a Resource Guide to support and assist GTOs and auditors in assessing their compliance with the Standards and for internal review activities. These Standards were slightly revised in 2006. The *National Standards for Group Training Organisations 2017* and this *Evidence Guide* are the next step in this evolutionary chain.

National support for the Standards

The revised Standards and newly developed Evidence Guide were developed in consultation with states and territories and endorsed by the Council of Australian Governments' (COAG) Industry and Skills Council (CISC). This COAG Council consists of the Australian, State and Territory ministers with responsibility for skills within their jurisdiction.

Whilst the apprenticeship and traineeship system in Australia is subject to Commonwealth, State and Territory legislation and regulation the Standards reflect a national policy agreement. They provide a contemporary approach to assuring quality in managing the delivery of apprenticeships and traineeships by group training organisations.

The revised Standards were adopted by all jurisdictions from 1 January 2017. State Training Authorities (STAs) will determine the transition arrangements in their jurisdictions, including finalising any audits under the previous Standards, the process to move existing GTOs to the revised Standards, the requirements for organisations seeking GTO registration for the first time and any future auditing arrangements under the revised Standards.

2 About this Evidence Guide

The development process

This Evidence Guide has been developed to strengthen the information and guidance provided to GTOs to help them comply with the *National Standards for Group Training Organisations (2017)*. The Guide provides practical examples of evidence which GTOs might use to show compliance with the new Standards. Many examples have been drawn from the support documents underpinning existing related quality and audit frameworks—including the *Resource Handbook* which accompanies the existing National Standards for GTOs and the *Users' Guide* associated with the Standards for RTOs (2015).

Advice on examples has also been provided through consultations with STAs, National Apprentice Employment Network (NAEN), state/territory Group Training Associations and their members, as well as from non-GTA members and other relevant stakeholders.

The aim of this exercise has been to ensure consistency/complementarity, where appropriate, with other quality and audit frameworks in the VET sector, while minimising the regulatory burden and maximising transparency for employers and potential apprentices/trainees.

Providing evidence of compliance with the Standards

Essentially, the Standards describe the outcomes GTOs must achieve to become registered and to maintain their registration status, but do not prescribe the methods to achieve these outcomes. The new approach to demonstrating compliance against outcomes rather than outputs recognises the diversity of the sector, that each GTO is different and that GTOs are best placed to decide the most appropriate way to structure and manage their organisations to suit their operations, those of their host employers and of their apprentices/trainees.

This allows GTOs to be flexible and innovative in managing the delivery of the apprenticeship/traineeship and assuring the quality and continuity of employment and training for the apprentice or trainee. As long as a GTO can present evidence to demonstrate compliance with the Standards there is no 'one right way'. Accordingly, the Evidence Guide does not prescribe how evidence must be retained to demonstrate compliance.

In assisting GTOs to understand how they might provide evidence of compliance with these Standards, the examples in this *Evidence Guide (the Guide)* are focused on GTO practice and behaviour, with an emphasis on GTOs being able to demonstrate increased use of feedback and review and the action they have taken to accommodate the advice provided by clients, where appropriate. This presumes the GTO has developed policies and procedures related to each of the Standards as essential to guiding their operations. This differs from the arrangements in place for the previous *National Standards for GTOs (2003)* where auditing processes against the Standards focused on satisfying evidentiary requirements through a set of policies and procedures associated with each Standard.

GTOs adopting this new approach are more likely to have the necessary policies and processes in place which enable them to operate effectively and efficiently, and less likely to operate as a higher risk organisation. Notwithstanding this, it is recognised that a new GTO seeking initial registration would be expected to provide evidence that it has the necessary policies and practices in place to begin operating as a quality organisation.

The examples in the Guide are designed to demonstrate how GTOs could show evidence to comply with the new Standards, and in particular, how the GTO focuses on the quality of its service and the outcomes it achieves. The examples suggest ways in which GTOs might provide evidence of their continuous improvement processes, including how they seek feedback from stakeholders and clients and action taken as a result of their analysis of this input. The examples are not intended as prescriptive criteria for compliance or a checklist, and do not reflect all the ways that GTOs can demonstrate compliance against a Standard. There is no ideal number of examples of evidence which GTOs should provide. GTOs can use one, some or all of the examples provided or develop examples of their own—as long as they can demonstrate compliance with the Standard.

GTO management and staff should use the Guide to obtain a clearer understanding of the Standards and the obligations of a GTO and use that knowledge to structure the way they gather and retain evidence of compliance. In providing evidence of compliance against the Standards GTOs should consider whether:

- the evidence is sufficient to show regular or consistent compliance as distinct from evidence of inconsistent implementation;
- the evidence is authentic;
- the evidence clearly shows compliance with a particular Standard rather than inferred or general evidence.

The structure of the Guide

The Guide has been structured to focus on the three key elements identified in the Standards as critical to achieving the key outcome for a GTO to develop an apprentice/trainee to become a skilled worker who has completed a recognised qualification:

- the recruitment, employment and induction stage;
- monitoring and supporting apprentices and trainees to completion;
- a sustainable GTO which is well governed and administered.

Each element contains:

- **The context**—an overview reflecting the specific element of GTO business which covers the intent of a group of Standards; and
- **A guide to compliance**—examples of the evidence which GTOs could use to demonstrate compliance with each of the Standards.

Equipped with this information, each GTO can apply the Standards in the context of their own operational model.

Key users of the Guide

Key users of the Guide include:

- **Organisations applying to become GTOs**—to understand the obligations of a GTO, and develop systems and processes in preparation for submitting an application for initial registration;
- **Current GTOs**—to understand their regulatory obligations, and to establish and maintain practices that comply with the Standards and suit the GTO, its host employers and apprentices/trainees. In particular, the Guide is likely to be used by:
 - GTO staff creating and recording evidence of their compliance with the Standards as part of their day-to-day work;
 - GTO staff assessing evidence of compliance with the Standards as part of their internal review processes and to guide continuous improvement initiatives; and
- **People outside the GTO**—including auditors and STA officers, to help them make consistent judgements about the intent of the Standards and how GTOs can implement the Standards in ways that suit them and their apprentices/trainees and to help them evaluate the evidence for external review of a GTO's compliance with the Standards.

To meet the needs of these users the Guide has been designed to:

- be practical, relevant and easy for users to understand and apply;
- help GTOs identify evidence to demonstrate compliance with each Standard, including identifying areas for improvement; and
- enable a template for internal review and self-assessment to be developed, noting that self-assessment mechanisms prove useful in the audit process.



Related issues

Legislation

GTOs, as employers of apprentices and trainees, are subject to specific apprenticeship/traineeship legislation and regulations in each State and Territory. In addition, the RTOs they select to undertake the training element of an apprenticeship/traineeship are subject to the VET Quality Framework, a system which ensures the integrity of nationally recognised training in Australia.

Complaints about GTOs

Stakeholder complaints about GTOs are an important source of intelligence about the operation of the group training sector of the apprenticeship/traineeship market. These are sometimes relayed to STAs or the Australian Government by apprentices or trainees, host employers, RTOs and other members of the community. In some instances, these will relate to the employment conditions associated with the apprenticeship/traineeship system and be subject to State/Territory legislation or regulations. In other instances, they may relate to the operation of a GTO and the National Standards.

GTOs need to have in place policies and procedures for dealing with the potential for a range of complaints to arise. These will often be resolved using the internal mechanisms in place; in some instances though, independent mediation may be required.

STAs will also have in place processes and procedures for dealing with complaints and may use the information gathered through complaints as part of its strategy for monitoring the compliance of GTOs and for gathering data on emerging risks.

Updated advice

The Guide may be updated from time to time through a national agreement involving STAs and the Australian Government. Updated versions will be published on the Australian Apprenticeships website at www.australianapprenticeships.gov.au and on STA websites. Any printed copies should be checked for currency against the most recent digital copy.

This is Version 1.1 of the Guide.

3 Providing evidence of compliance with the *National Standards for Group Training Organisations (2017)*

1. Recruitment, Employment and Induction

The Context

As the employer of prospective and current apprentices and trainees, a Group Training Organisation needs to ensure that an initial set of steps are in place for achieving the quality outcome desired i.e. where the employment and training arrangements provide high quality on- and off-the-job training for an apprentice/trainee which results in their gradual development as a skilled worker and their completion of a recognised qualification.

In the first instance, achieving a successful outcome requires GTOs to have in place:

- a recruitment process which results in the 'right' person being recruited for a job as an apprentice or trainee. The process should ensure a match between the interests, aspirations and skills of a prospective apprentice/trainee and the expectations of the GTO as the employer;
- strong processes for recruiting and assessing host employers who have the capacity to provide the facilities, range of work and supervision in relation to the Training Plan required for the apprenticeship/traineeship i.e. hosts with the skills to reinforce the off-the-job training provided by RTOs with on-the-job experience in their workplace and a willingness to develop their skills in the management of apprentices/trainees and in mentoring etc.;
- the capacity to provide support to hosts to assist them in their role with an apprentice or trainee;
- transparent information relating to the employment and training arrangements, so that prospective and current apprentices/trainees know and understand the nature of the industry area and the apprenticeship/traineeship they are entering or have 'signed up' to;
- an induction program which ensures the apprentice/trainee knows and understands their obligations, those of the GTO as their employer, as well as those of the host employer and the RTO selected. The induction program should also cover the nature and operation of the workplace, the importance of workplace health and safety and the legal/regulatory issues which need to be adhered to.

Standard 1.1

Before apprentices/trainees enter into an Employment Contract and a Training Contract, the GTO informs them about their employment conditions, the host employer arrangement, the training, the support services to be provided and the rights and obligations of the parties.

A guide to compliance

The GTO could demonstrate that in the recruitment phase it provides transparent, accurate and accessible information about its services and performance as an organisation to prospective and current apprentices/trainees and has in place mechanisms which aim to ensure the 'right' person is recruited for a job as an apprentice/trainee by:

- demonstrating how recruitment practices include mechanisms for determining the suitability of an individual for a specific apprenticeship or traineeship, including:
 - matching the interests, aspirations and skills of a prospective apprentice/trainee and the expectations of the GTO as the employer;
 - how assessments are made of language, literacy and numeracy levels;
 - how the identification of special needs is initially assessed;

- demonstrating that comprehensive information is provided to apprentices/trainees in a range of formats e.g. paper-based, online and verbally, and that opportunities are provided to clarify information;
- demonstrating efforts which have been made to inform parents/guardians of apprentices/trainees who are under 18 years of age e.g. GTOs could ask apprentices/trainees and their parents/guardians to sign an acknowledgement that they received information and maintain a register of those acknowledgements;
- retaining copies of the actual information and any advertising and marketing material used in the recruitment and induction process. Retaining a copy and register of all approved material, while not mandatory, will make it easier for the GTO to monitor its information services and marketing and allows this information to be presented as part of an audit or in the investigation of a complaint;
- providing evidence of a system being in place (e.g. internal review, client feedback, complaints process), to monitor and review recruitment processes and practices and the information, advertising and marketing material provided to ensure effective 'matching' has taken place and information is accurate and not misleading.

Standard 1.2

The GTO inducts apprentices and trainees to the apprenticeship/traineeship system, including explaining:

- the apprentice/trainee's responsibilities under the Training Contract, to the host employer, the GTO, the Registered Training Organisation (RTO) and the school (if under School-based arrangements); as well as
- the processes involved in accessing support and dealing with employment or training issues that may arise.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing evidence of the conduct of an induction program for each apprentice/trainee, including:
 - the content of the program, how it builds on the information provided in the recruitment stage and how it focuses on the apprentice/trainee's responsibilities under the Training Contract, to the host employer, the GTO, the Registered Training Organisation (RTO) and the school (if under School-based arrangements);
 - how the induction program is delivered;
- indicating any specific efforts made during the induction process to focus on:
 - the nature and operation of the workplace;
 - industrial relations and workplace rights and responsibilities, with particular emphasis on cancellation processes and procedures, including appeals, access to relevant bodies in case of disputes at a jurisdictional level or nationally through the Fair Work framework;
 - workplace health and safety rights and responsibilities and various legal/regulatory requirements which need to be adhered to;
 - ensuring that the parents of apprentices or trainees who are school students, or under the age of 18, are also provided with the information associated with the induction process;
 - the support mechanisms available to assist the apprentice/trainee e.g. literacy and numeracy support, access to GTO field staff, and for dealing with specific employment and training issues e.g. grievances/complaints;
- providing evidence that all newly employed apprentices/trainees have completed the induction process prior to commencing work or training e.g. apprentice/trainee 'sign off' of induction checklist covering all elements of this Standard;
- demonstrating how the GTO's induction policy and/or the program conducted by the GTO is regularly reviewed and/or has changed as the result of analysis of data or feedback from apprentices/trainees, host employers, the RTO or school (in the case of school students).

Standard 1.3

The GTO provides clear and accurate advice to host employers to:

- take reasonable steps to ensure they understand the apprenticeship/traineeship system; and
- obtain their agreement, by means of a Host Employer Agreement, to their role and responsibilities in training and supporting the apprentice or trainee while in their workplace, in meeting their obligations to maintain a safe workplace and in working cooperatively with the GTO and RTO.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing evidence of the processes a GTO has in place for recruiting and assessing host employers in terms of their capacity to provide:
 - the appropriate facilities and comply with their legislative responsibilities as a proxy employer;
 - a safe workplace (e.g. evidence of a Work Health and Safety site audit);
 - the range of work and supervision required in relation to the Training Plan i.e. hosts with the skills to reinforce the off-the-job training provided by RTOs with on-the-job experience in their workplace;
- indicating the mechanisms which the GTO has in place to support hosts to train and support an apprentice or trainee;
- providing an outline of the nature and content of the induction process and evidence of host employer participation via signed acknowledgement;
- demonstrating the effectiveness of the GTO induction process, the GTO's relationships with host employers and the GTO's support to host employers e.g. via analysis of feedback provided by host employers and an assessment of levels of repeat business;
- indicating how the Host Employer agreement is regularly reviewed and what changes have been made as a result of analysis of the GTO/industry environment and/or feedback from host employers and RTOs.

Standard 1.4

The GTO actively participates in the RTO's development of the Training Plan, which is based on competency—based progression and completion principles and relevant to the qualification, the occupation, the host employer's workplace and the needs of the apprentice/trainee, in conjunction with the apprentice/trainee.

A guide to compliance

Whilst recognising that it is the responsibility of the RTO to develop the Training Plan for each apprentice/trainee, GTOs could demonstrate compliance with this Standard by:

- providing evidence that the GTO and the apprentice/trainee have actively participated in development of the Training Plan and both parties have had an opportunity to 'sign off' on the Training Plan;
- providing evidence that each Training Plan is based on competency-based progression and completion principles and relevant to the qualification, the occupation, the host employer's workplace and the needs of the apprentice/trainee;
- documenting issues arising in the Training Plan development and implementation process impacting on the delivery of the apprenticeship/traineeship by the GTO and/or host employer and referred to the RTO, and action taken to address these issues;
- maintaining records of discussions between the RTO, host employer and the GTO regarding reviews of Training Plans and negotiations and agreements about competency-based progression.

2. Monitoring and Supporting Apprentices and Trainees to Completion

The Context

The GTO needs to have a range of effective systems in place to monitor and support the apprentice/trainee to increase their likelihood of completing their qualification and becoming a skilled worker and address issues which might lead to a discontinued apprenticeship/traineeship. Achieving this outcome requires the organisation to be pro-active, have strong risk management strategies in place and clear practices in customising its services to meet the needs of clients.

Demonstrating compliance with this group of Standards requires a strong relationship between:

- the GTO, as the legal employer of an apprentice/trainee;
- the host employer, as the purchaser of services from the GTO and the day to day supervisor in the workplace;
- the RTO selected, given their responsibility to engage with the employer when developing training and assessment strategies for inclusion in the Training Plan; and
- the apprentice/trainee in undertaking their training and productive work.

The basis for this strong relationship is established through all parties understanding the roles and responsibilities of each in the Host Employer Agreement, referred to in Standard 1.3 and the Training Plan, referred to in Standard 1.4.

Monitoring levels need to be sufficient to:

- maintain high level oversight of the progress of the apprentice/trainee against their Training Plan, including being able to make a regular assessment of the quality and breadth of their work; and the adequacy of the supervision of on-the-job training by the host employer and any consequent need to coordinate rotation arrangements;
- enable decisions about the nature and frequency of support and mentoring required in the workplace, in line with the needs of hosts and apprentices/trainees;
- assess the workplace provided by the host and monitor workplace health and safety issues during visits.

While the third-party arrangement intrinsic to group training contains some risks, these can be significantly reduced by focusing attention and resources on working with the host employer and the apprentice/trainee to monitor and assess progress. Risks include putting the apprentice or trainee in danger from a workplace health and safety perspective, non-completion of a qualification and loss of repeat business with the host employer.

Standard 2.1

The GTO provides services that meet the needs of apprentices and trainees to facilitate the continuity of the Training Contract to completion and the quality and breadth of the training experience, including:

- support and mentoring throughout the Training Contract;
- providing resources or advice or procuring any special equipment for the workplace in order to meet access and equity and Work Health and Safety requirements.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing evidence of the support mechanisms advertised and available over the term of the apprenticeship/traineeship and their usage by apprentices/trainees, including for specific population or age groups e.g. literacy and numeracy support, mentoring;
- indicating the steps the GTO takes to assess the need for, and level of, support and mentoring for each apprentice/trainee;

- outlining examples of the analysis undertaken to assess the level of need for resources, advice or special equipment to meet requirements for access and equity, workplace health and safety and the quality and breadth of the on-the-job training experience;
- providing the results of analysis of the outcomes achieved by those receiving support and mentoring, resources, advice or special equipment;
- providing results of assessment of the relative value of each support service and the mentoring arrangements provided for individual apprentices and trainees to facilitate the completion of their Training Contract, based on feedback provided by apprentices/trainees, host employers and RTOs;
- outlining examples of changes required in the provision of support and mentoring as a result of analysis and feedback, and action taken to better target available resources to achieve improved outcomes.

Standard 2.2

The GTO monitors each apprentice or trainee's progress against the Training Plan and:

- facilitates the integration of the training and employment experiences, including arranging for workplace rotations if required;
- requests that the RTO review the Training Plan when changes occur with the apprentice/trainee employment arrangements, including any workplace rotations, competency-based progressions or other changes.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- maintaining records of discussions/file notes relating to progress against the Training Plan arising from GTO monitoring visits to the apprentice/trainee workplace and documenting the identification of issues arising to be addressed by the GTO, the RTO, the host employer or the apprentice/trainee;
- outlining the process used to assess the host employer's capacity to provide the facilities, range of work and supervision required for the Training Plan and actions taken to arrange workplace rotations, when required;
- indicating the number and nature of reviews of the Training Plan which the GTO has requested the RTO to undertake as a result of changes to apprentice/trainee employment arrangements, including any workplace rotations, competency-based progressions or other changes;
- recording the analysis of the integration of on- and off-the-job training and the changes being made to the Training Plan via feedback from apprentices/trainees and from host employers.

Standard 2.3

The GTO has appropriate systems in place, based on the scale and scope of its operations, to manage and support apprentices and trainees in times of economic downturn or 'stand down' to facilitate the retention of the apprentice or trainee.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing an overview of the policies and procedures in place to address economic downturn, including:
 - what has been done to find a new placement for the apprentice/trainee prior to a potential suspension;
 - how the governing body of the GTO has considered the risk of this occurring and made allowance for financial reserves to enable specific levels of support to be provided to apprentices/trainees;
- providing an overview of the GTO's action to address 'stand down' where it has been used over the past three years, including an assessment of the reasons underlying changes in levels of activity and how the risk has been managed to support apprentices/trainees and facilitate their retention until completion;

- analysing the records of discussions/interviews/negotiations regarding the suspension or stand down of an apprentice/trainee or the cancellation of an apprenticeship/traineeship over the past three years and showing how this has been used by the governing body to review and revise policies and procedures.

Standard 2.4

The GTO provides assistance, coordination and accurate advice to host employers for the duration of the Host Employer Agreement, and works with the host employer to provide appropriate on-the-job training, supervision, support and mentoring to the hosted apprentice/trainee.

A guide to compliance

GTOs could demonstrate evidence of compliance with this Standard by:

- maintaining and analysing records, information or data that indicates the nature, scale and quality of each of the services provided to host employers over a period of time, including:
 - how often, what sort, and what levels of contact field staff have with each apprentice/trainee and with host employers, and the nature of the issues arising;
 - how often and in what ways have specific efforts been made to assist host employers to develop their skills in the management of apprentices/trainees and in mentoring etc.;
 - how often placements by rotation (when possible and appropriate) are required to take place due to economic reasons associated with the nature of the employment provided by host employers, or to fulfil skill requirements i.e. where there is the need for an apprentice/trainee to undertake on-the-job training elsewhere to demonstrate competency across the full range of skills required within a qualification;
 - levels of downtime and the reasons for these;
 - the number and percentage of apprentices and trainees ceasing their Training Contract and reasons for cancellation;
 - differences across apprentice/trainee cohorts and across industry areas;
- action taken to address issues arising from analysis of the records, information, data or incidental notes kept within the organisation;
- outlining and assessing the involvement of the host employer in supervising the attainment of competencies and their role in the endorsement of competency on-the-job;
- seeking formal feedback from host employers and apprentices/trainees on the implementation of this Standard e.g. through the use of focus groups, satisfaction surveys or other mechanisms; providing evidence of analysis of the data and feedback received (together with an analysis of the complaints register) and indicating action taken to address this.
- providing evidence that the host employers' capacity to provide the range of work, workplace facilities and equipment and supervision (i.e. via a list of qualified trades persons, skills audit etc.) for the apprentice/trainees has been regularly assessed and reviewed and their assessment remains up to date and accurate.

Standard 2.5

Where there are any performance issues with an apprentice/trainee, the GTO manages these issues fairly¹, and records the outcome and the feedback provided to the apprentice or trainee.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- outlining the number and nature of issues which have required action under the performance management policies and procedures in place for apprentices/trainees employed by the GTO;
 - showing that the issues have been analysed to indicate whether they have been generated by the GTO or the host employer;
 - identifying whether the issues arising are systemic in nature and require some action by the GTO with all apprentices/trainees;
- demonstrating that outcomes of performance management are dealt with in accordance with the GTO's policy and procedures, are recorded, and are acknowledged by the apprentice/trainee;
- reviewing performance management policies and procedures on a regular basis to assess their effectiveness, including taking into account evidence arising from the complaints process and feedback from apprentices/trainees.

Standard 2.6

The GTO complies with Commonwealth, State and Territory requirements for competency-based progression and completion and supports genuine efforts to achieve the qualification in an appropriate timeframe regardless of the nominal duration of the Training Contract.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- indicating the nominal duration specified in the Training Contracts which a GTO, as the employer, has signed with apprentices/trainees, and the policies and procedures that guide the GTO and staff in complying with the requirements;
- providing evidence of the information mechanisms used to advise host employers and apprentices about industrial agreements to support competency based progression and completion in the apprenticeship/traineeship and the role of the RTO;
- demonstrating the efforts undertaken to achieve the qualification in a reasonable timeframe, including mechanisms for guiding staff on actions they can take to ensure compliance, and identifying potential areas for improvement;
- providing an analysis of the feedback provided by host employers, RTOs and apprentices/trainees on the implementation of competency-based progression and completion;
- analysing the outcomes for apprentices/trainees of GTO efforts to implement competency-based progression and completion policies and the actions proposed and/or taken to address issues arising from implementation.

¹ The term 'fairly' refers to the need to ensure that provision for natural justice and procedural fairness are incorporated in the GTO processes associated with their assessment of an apprentice or trainee's performance.

3. GTO Governance and Administration

Being able to demonstrate that an organisation is not only well governed and administered but also viable inspires client and stakeholder confidence in the GTO brand.

For GTOs it is important to have in place the governance and administration arrangements which underpin a viable organisation, appropriate to the scale of the GTO. These arrangements are critical to compliance with the Standards associated with the recruitment, employment and induction of an apprentice or trainee and supporting them in their gradual development to become a skilled worker with a recognised qualification. Complementing this, GTOs also need to have in place arrangements to demonstrate they comply with relevant government statutory obligations.

Business viability is critical to the ongoing sustainability of a GTO and the investment it makes in its services. The Standards and Evidence Guide recognise that the factors determining the viability of a GTO are dependent upon its business objectives and operating characteristics. For example, the factors determining the business viability of an industry-based GTO embedded within a major Australian industry organisation may be different to those affecting a GTO operating across a range of occupational sectors or a community-based provider.

If the viability of a GTO is at risk this is most likely to negatively impact on the quality of its services and its capacity to focus on providing high quality skilled workers. Operational and financial business standards therefore provide important protective measures for the apprentice/trainee, the GTO and the host employer, as well as acting as a disincentive for under-prepared organisations to enter the market.

When GTOs comply with the Standards:

- apprentices, trainees and host employers know:
 - their GTO is stable and well-governed, and are confident it will continue to operate, be properly resourced to support the development of a skilled worker, and be safe;
 - their GTO has arrangements in place to prevent or limit exposure to non-completion or financial loss in the case of the GTO closing or not being able to provide the employment and training;
- industry sectors and employers of apprentices or trainees can be confident that the GTO can adequately employ and resource their staff to undertake the duties required and that the GTO will continue to operate through the life of the Apprenticeship/Traineeship Training Contracts in place;
- governments can be confident investing in the services provided by the GTO knowing they are stable, viable, well governed and administered;
- a transparent complaints and appeals policy is in place which enables apprentices/trainees and host employers to be informed of and understand their rights and the responsibilities of the GTO under the Standards.

Allowing apprentices/trainees and host employers to easily engage with staff about any concerns they have can stop minor issues becoming larger. Surveys of apprentices/trainees and host employers will also indicate ways to improve practices before they escalate into an official complaint.

Notwithstanding this, a GTO needs to have formal mechanisms, transparent to clients and stakeholders, where the issues do not relate to the complaints mechanisms contained in other legislative or regulatory arrangements.

GTOs should take care to develop policies to distinguish between complaints relating to the operations of the GTO and/or the host employer, and those relating to aspects of the apprenticeship/traineeship which are subject to other state/territory and federal legislation and regulations e.g. learning and assessment, employment conditions, workplace health and safety, privacy and child safety.

Standard 3.1

The GTO complies with Commonwealth, State and Territory legislative and regulatory requirements and policies as they relate to the employment and training of apprentices and trainees in each State and Territory in which they operate.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- outlining the specific legislative and regulatory requirements and policies it needs to comply with, how these are integrated into policies and/or procedures within the organisation and how these are kept up to date, e.g. in relation to the State/Territory VET Act, policies and guidelines and industrial relations and workplace rights matters such as the cancellation process and procedures;
- demonstrating how the organisation addresses legislative or regulatory changes by governments;
- demonstrating evidence of how the organisation keeps staff and clients informed of their obligations, the obligations of the organisation and of hosts, apprentices and trainees;
- outlining areas of compliance requiring improvement within the organisation, following internal analysis or evidence of breaches of legislation/regulation, and the actions taken to address the issue.

NOTE: Should STAs become aware that a GTO has not complied with any legislative or regulatory requirement, they may notify the relevant regulatory agency. Breaches of legislative or regulatory requirements may affect the continued registration of the GTO.

Standard 3.2

The GTO is incorporated in Australia, a government entity, or regulated by the Australian Charities and Not-for-profits Commission.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing documentation indicating the legal status of the organisation;
- demonstrating changes to the governance framework as a result of any alterations required of an organisation to retain incorporation or regulation status.

Standard 3.3

The GTO develops, monitors and continually improves its performance and strategic directions using performance data, the results of audits, assessments and surveys plus any other relevant information.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- having a current business plan in place, which details the objectives of the business, analysis of business markets and financial projections for the next 12 and 24 months and showing the plan is regularly considered by the Board;
- outlining the risk assessment and management plan for the organisation;
- having a continuous improvement framework in place to regularly review the business plan and risk management plan and the processes designed to:
 - regularly monitor the effectiveness of service delivery;
 - review policies and procedures;
 - seek feedback from apprentices and trainees, host employers and key stakeholders;
- providing examples of improvements introduced as a result of monitoring, reviewing and seeking feedback;

- outlining the mechanisms used to ensure performance indicators for the organisation are communicated to, and understood by, staff;
- indicating how analysis of the external environment and continuous improvement processes have contributed to revised corporate governance arrangements and to improve decision making, accountability and control of the GTO. Issues for attention could include:
 - the ownership, structure and control of the GTO;
 - membership, skills and experience of the Board or governing body, and of senior management;
 - key provisions for decision making and accountability, including delegation of authority and matters reserved for the governing body;
 - selection and induction procedures relating to governance arrangements and the provision of training and tools to support members with their corporate governance responsibilities.

Standard 3.4

The GTO can demonstrate that it is financially viable and inform the registering body where early signs indicate issues associated with viability.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- providing evidence of accounts certified by a qualified accountant, at least annually, and Fit and Proper Person tests applied to members of the governing body and senior management;
- providing evidence that the organisation has the capacity to assess its financial viability by having:
 - an accounting system or outsourced accounting arrangements in place which can regularly reconcile management accounts and prepare management reports on a monthly basis and a financial budgetary process that is able to forecast profits for the next 12 months;
 - financial management policies and procedures and senior staff with skills related to financial controls and delegation, budgeting processes, purchasing, payroll processes and asset management; and
 - appropriate skills within the governance body to focus attention on the issue of financial viability;
- demonstrating that the allocation of resources in the business plan is appropriate to securing the key outcome for the organisation i.e. developing apprentices/trainees to become skilled workers;
- indicating how the risks to financial viability have been identified and action taken to address these in order to ensure that appropriate resources can be allocated and apprentices and trainees monitored and supported to completion of their qualification and host employers supported to undertake their role;
- indicating how the business objectives and operating characteristics of the GTO are underpinned by the availability of financial resources to prevent or limit exposure to financial loss which might result in the GTO closing e.g. through the diversification of business to ensure that a GTO does not rely heavily on one large client for its viability;
- demonstrating that the GTO has processes in place for regularly analysing the financial viability of the organisation e.g. documented regular Board consideration of this issue, and what action it will take or has taken to inform the registering body where early signs indicate issues associated with viability;
- analysing feedback from clients, and in particular from host employers who are purchasing services from the GTO, on:
 - their levels of satisfaction with regards to ‘value for money’ for the monitoring and support mechanisms provided by the GTO;
 - levels of repeat business.

Standard 3.5

The GTO holds appropriate insurances according to the size and scope of its operations.

A guide to compliance

Some of these insurances will be compulsory for a business to operate within its jurisdiction; others will be optional. They may include, but not be limited to insurance for workers compensation, public liability, professional indemnity, building and contents, vehicles, debtors, host equipment, cyber insurance etc. The level of insurance held should be appropriate to the scope of the GTO's operations.

GTOs could demonstrate compliance with this Standard by:

- retaining evidence that they hold these insurances by keeping a copy of a certificate of currency or similar. Quotes and invoices are not sufficient evidence to prove that insurance is actually in place;
- confirming that all activities associated with the employment and training of staff and apprentices/trainees and with host employers are covered in a sufficient manner, or that there are no restrictions on the activities covered;
- providing evidence which indicates that the various policies have been reviewed on an annual basis or upon need, based on feedback or events related to the policies.

Standard 3.6

The GTO adheres to the principles of access and equity in all operations including marketing, recruitment, monitoring, support, governance and administration.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- monitoring and analysing the outcomes for clients, in particular of apprentices/trainees facing barriers to participation and achievement in training and employment, as a result of implementing access and equity principles, policies and procedures within the operations of the GTO;
- identifying improvements made to the operations of the GTO in the areas outlined in the Standard, or issues to be addressed, as a result of this analysis;
- indicating improvements made to the training of staff or host employers and information provided on strategies for addressing access and equity principles;
- providing evidence of appropriate services being provided or partnering with specialist organisations to assist in the recruitment and support of apprentices and trainees facing barriers to training and employment;
- working with hosts to ensure apprentices and trainees with a disability have access to reasonable adjustments if required i.e. work processes, practices, procedures or environments that enable an employee with disability to perform their job in a way that minimises the impact of their disability.
- seeking feedback from clients and stakeholders, including organisations with specialist equity skills, where appropriate, on the operations of the GTO in terms of providing support for those facing barriers to training and employment.

Standard 3.7

Clear and accurate marketing, advertising materials and other information is provided by the GTO regarding GTO services, the role and responsibilities of the host employer and the requirements of the apprenticeship/traineeship.

A guide to compliance

GTOs could demonstrate compliance with this Standard by:

- indicating the nature and format of marketing, logos, advertising materials and other information provided, and how these are maintained as clear and accurate by the GTO
- demonstrating how the GTO is able to honour in practice the commitments it makes in its marketing materials;
- retaining a copy and register of approved material, plus evidence of permission forms and/or release clauses in the case of references to people or organisations in marketing material;
- outlining how marketing material is developed and approved to be compliant with this Standard;
- demonstrating the continuous improvement mechanisms in place to seek direct and regular feedback from clients and stakeholders on existing material and information for clarity and accuracy;
- identifying actions which have been taken to improve existing policies, information and procedures as a result of internal review and external feedback.

Standard 3.8

Complaints and appeals are dealt with by the GTO transparently in accordance with a documented complaints and appeals process, or referred to State/Territory dispute resolution mechanisms, where the completion of the Training Contract is at risk.

A guide to compliance

GTOs could demonstrate evidence of compliance with this Standard by:

- retaining evidence that they have a publicly available and easily accessible policy or policies to deal with complaints and appeals e.g. including policies and processes on your website and/or displaying them in common areas for staff and apprentices/trainees. The policy or policies should distinguish where any GTO responsibilities lie and be made available to the third parties;
- outlining the steps taken to ensure GTO staff understand the current dispute resolution mechanisms in place within the GTO and within the State/Territory;
- outlining the steps taken to provide apprentices/trainees, their parents, where relevant, host employers and other clients and stakeholders with information about how the GTO handles complaints and appeals, including referral to other parties such as those associated with industrial relations and workplace rights;
- clearly showing how to lodge a complaint or appeal and explaining what will happen as a result and in what timeframes, including showing how you ensure people are not disadvantaged e.g. by not requiring the completion of overly complex forms or extensive written information, which can be a barrier to apprentices/trainees expressing their concerns;
- indicating how your processes follow the principles of natural justice and procedural fairness e.g. by allowing anyone subject to a decision by your GTO, or anyone who has allegations made against them, to tell their side of the story before a decision is made and by ensuring that the decision maker is independent of the decision being reviewed;
- making arrangements for an independent third party to review the complaint or appeal if the person making the complaint or appeal is not happy with the outcome. Any costs associated with a third party review should be disclosed in your policy;
- recording all complaints and appeals received, keeping evidence of how the matter was dealt with, the outcomes and timeframes;
- analysing the number and level of complaints and indicating how you have reviewed your GTO's processes and practices to ensure the issue doesn't happen again or to minimise the likelihood of future complaints.

