DRAFT
QUALITY ASSURANCE PROGRAM
### Abbreviations:

<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Description</th>
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<tbody>
<tr>
<td>AAT</td>
<td>Administrative Appeals Tribunal</td>
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<tr>
<td>ADF</td>
<td>Australian Defence Force</td>
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<td>APS</td>
<td>Australian Public Service</td>
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<tr>
<td>AQF</td>
<td>Australian Qualifications Framework</td>
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<tr>
<td>ASO</td>
<td>Administrative Services Officer (attached to RMG)</td>
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<td>ASQA</td>
<td>Australian Standards Quality Agency</td>
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<tr>
<td>ATDP</td>
<td>Advocacy Training &amp; Development Program</td>
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<tr>
<td>BEST</td>
<td>Building Excellence in Service and Training</td>
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<tr>
<td>CFMG</td>
<td>Capability Framework Management Group</td>
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<tr>
<td>CoP</td>
<td>Community of Practice</td>
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<td>DVA</td>
<td>Department of Veterans’ Affairs</td>
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<td>ESO</td>
<td>Ex-Service Organisation</td>
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<td>ESORT</td>
<td>Ex-Service Organisation Round Table</td>
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<td>NTM</td>
<td>ATDP’s National Training Manager</td>
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<tr>
<td>PPP</td>
<td>Practice, procedure &amp; policy</td>
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<tr>
<td>QA</td>
<td>Quality assurance</td>
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<td>QC</td>
<td>Quality control</td>
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<td>RM</td>
<td>Regional Manager</td>
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<td>RMG</td>
<td>Regional Management Group</td>
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<td>RPL</td>
<td>Recognition of Prior Learning</td>
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<td>RTO</td>
<td>Registered Training Organisation</td>
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<td>SGB</td>
<td>Strategic Governance Board</td>
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<tr>
<td>TIP</td>
<td>Training and Information Program</td>
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<td>VET</td>
<td>Vocational Education &amp; Training</td>
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<td>VITA</td>
<td>Veterans’ Indemnity Training Association</td>
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<td>VRB</td>
<td>Veterans’ Review Board</td>
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## Glossary:

<table>
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<tr>
<th>Term</th>
<th>Definition</th>
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<tr>
<td>Advocate</td>
<td>A person providing compensation or welfare advocacy</td>
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<tr>
<td>Affiliated ESO</td>
<td>An ESO which has sought and been granted affiliate status by ATDP</td>
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<tr>
<td>ATDP accredited advocate</td>
<td>An authorised advocate holding current ATPD qualifications</td>
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<tr>
<td>BEST program</td>
<td>A DVA grants program providing funding to ESOs and VSCs</td>
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<tr>
<td>Client</td>
<td>unless otherwise indicated, ‘client’ means a serving or former member of the ADF or their dependents utilising the services of an ESO authorised advocate</td>
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<tr>
<td>Continuous improvement</td>
<td>The ongoing process of change for the purpose of improvement to practices and processes</td>
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<tr>
<td>ESO authorised advocate</td>
<td>A person authorised to provide compensation or welfare advocacy on behalf of an ESO</td>
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<td>High quality advocacy services</td>
<td>For the purposes of this manual, ‘high quality’ advocacy services is taken to mean services which meet or exceed the reasonable needs and expectations of stakeholders</td>
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<tr>
<td>Policy</td>
<td>A formal statement of principle that regulates ATDP operations</td>
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<tr>
<td>Procedure</td>
<td>Describes the operational processes/steps to be adhered to in order to maintain effective adherence to the prescribed principles outlined in the associated policy</td>
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<tr>
<td>Quality Assurance</td>
<td>A planned and systemic organisational process through which ATDP and its partners can, as far as is reasonably practicable, ensure that the program meets its mission in compliance with applicable legislation, standards, policies and other relevant guidelines</td>
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<tr>
<td>Quality Control</td>
<td>The process through which the extent to which ATDP meets its mission and operating standards is measured and, where appropriate, corrective action implemented where deficiencies are identified</td>
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<tr>
<td>Quality cycle</td>
<td>The cyclic process of planning, quality improvement, quality control, quality and data reporting and quality improvement, including but not limited to benchmarking, audits, reviews and program or course review</td>
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<tr>
<td>Quality framework</td>
<td>The system in which activities used to carry out QA/QC and continuous improvement are completed</td>
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<tr>
<td>Skill set</td>
<td>A single unit of competency or a combination of units of competency from a training package which link to a licensing or regulatory requirement, or a defined industry need</td>
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<tr>
<td>Stakeholder</td>
<td>A individual or organisation who has an interest in, or is affected by ATDP’s operations</td>
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<tr>
<td>The Minister</td>
<td>The Minister for Veterans’ Affairs unless otherwise indicated</td>
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<tr>
<td>VET Quality Framework</td>
<td>A system which ensures the integrity of nationally recognised training in Australia</td>
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PART I
Introduction:

A brief history:

The genesis of ATDP begins with the release of the 2010 Rolfe Review\(^1\) of advocacy services. A technical working party was established by ESORT to design a new program for the training and development of ESO authorised advocates based on the review’s recommendations. The resulting ‘Blueprint’\(^2\) was endorsed by ESORT and the Minister in 2015. ATDP was launched by the Minister in the same year.

ATDP’s Structure & roles:

ATDP is a partnership between:

- Affiliated ESOs;
- DVA; and
- The Defence Department

ATDP has a three tier national structure involving each of the partners at all levels.

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SGB:

The SGB is the national body responsible for providing strategic direction, oversight and review of the quality and consistency of advocacy training. SGB members are appointed by the Minister from nominations tendered by the ATDP partners.

CFMG:

The CFMG is the national body responsible for all aspects of developing the capability framework. The capability framework drives the definition, development, education and awareness of practitioners. The CFMG reports to the SGB. Members are appointed by the SGB. The National Training Manager and CFMG Chair are also ex-officio members of the SGB.

RMGs:

The Regional Management Groups are responsible to the CFMG for the planning and delivery of training across their region, based on the nationally consistent curriculum. Importantly, the RMGs are responsible for creating and nurturing the CoPs within their regions. The Regional Managers are ex-officio members of the CFMG.

RTO:

The RTO is contracted to DVA. It is responsible for the development and maintenance of the units of competency underpinning the nationally recognised qualifications attached to ATDP courses. It is responsible to ASQA and DVA for the maintenance of standards through overseeing the assessment of training outcomes.

VITA:

VITA is an association comprising bona fide ESOs and VSCs established to foster the training and professional standards of ESO authorised advocates. This includes arranging and maintaining professional indemnity insurance cover for those practitioners. VITA has a seat on the CFMG.

CoPs:

CoPs are the bodies of advocates, their mentors and other interested parties which are developed and supported by the RMGs with the purpose of providing a setting in which advocates are supported in their work and ongoing professional development in a mutually supportive and collegial environment.
ATDP’s mission:

ATDP’s mission is to train and develop selected practitioners to provide high quality advocacy services to current and former ADF members and their dependents concerning rehabilitation, compensation, appeals and welfare.

Expectations:

ATDP is a publicly funded entity: it receives taxpayer’s funds from the Commonwealth Government via a grants system through DVA.

ATDP must therefore be able to demonstrate to its stakeholders generally that it gives utility to those resources ethically, efficiently, effectively and in accordance with relevant legislation and standards.

Commitment to a comprehensive QA/QC plan is an effective tool for demonstrating to its stakeholders that ATDP is serious about meeting stakeholder expectations through transparent and robust governance.

Context:

The ATD program provides a nationally recognised VET qualification registered by ASQA under the title 10620NAT – Course in Military Advocacy.

It is the RTO, which (pursuant to the legislative framework) has overall responsibility for the course. In effect, the RTO provides its services to the ATD Program via its commercial arrangement with DVA. The ‘owner’ of the course’s intellectual property is DVA.

As provided for in the legislative framework, ATDP (as an entity) provides a number of ‘services’ to, and on behalf of, the RTO. These include the structure within which the course is delivered and managed, subject matter expertise, teaching and learning delivery (including post qualification professional development), course development and maintenance and student assessment.

Notwithstanding this somewhat complex arrangement, it is the RTO – not the ATD Program – which issues the nationally recognised qualification. In its role of assessor, the RTO bears ultimate responsible for the ‘quality’ of the program’s graduates.

If, in its role as assessor, the RTO draws the conclusion that potential graduands are not reaching the required competency at the end of their training, the program partners must work collaboratively to remedy the situation.

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3 Standards for Registered Training Organisations (RTOs) 2015
As is typical of a VET organism, ATDP does not ‘employ’ graduates of its program. The initial recruitment and ongoing authorisation of graduate advocates to practice is the sole responsibility of ESOs and VSCs.

The ATD program’s core function is to impart the necessary knowledge and skill set - and create a continuous learning environment - through which an advocate’s potential to provide high quality advocacy services can be realised and continuously nurtured. Whether or not the ATDP trained practitioner fulfils her or his potential in the practice setting can be due to factors outside of ATDP’s influence or control; including both the work environment and the individual’s personal abilities/traits.

It must also be recognised that there is no bar to an individual offering advocacy services if that person is neither ‘ATDP trained or accredited’ nor authorised to practice by an ESO or VSC.

None of this is to suggest that ATDP has no need of a QA/QC program. It does however help to define the contextual environment which determines the scope and focus its QA/QC effort. It must be complementary with and give synergy to the QA programs of the RTO and the program’s partners.

‘Employer and Industry’ involvement:

Standard 1 of the Standards for RTOs states (in part):

“....employers and industry must have confidence in the integrity, currency and value of certification documents issued by RTOs, through high quality training and assessment practices that:

• meet the requirements of training packages and VET accredited courses;
• is responsive to industry and learner needs; and
• is delivered by appropriately qualified trainers and assessors with the right support services, facilities and equipment”.

In the ATD program context, ‘employer’ can be translated to ESO/VCS – ie the entities which recruit and authorise advocates to practice. In some instances, advocates are paid employees of ESOs.

‘Industry’ is defined as the entities which have a stake in the RTO’s (and by extension) ATDP’s operations. In the ATD program context, these stakeholders or ‘clients’ include:

• The body of serving and former ADF members, their families and dependents;
• Graduates of the ATD program;
• Communities of practice supporting advocates;
• DVA;
The ATD program must therefore work collaboratively with its partners and stakeholders to develop creative and robust feedback mechanisms founded in an environment of trust, cooperation, mutual interest and client focus.

About this manual:

This manual sets out the policies, practices and procedures adopted by ADTP to ensure that the training it provides meets the needs of ‘employers and industry’.

A further, and essential role of this manual is to ensure that, in ATDP’s geographically dispersed operating environment, national consistency in process, procedure and outcomes is both fostered and achieved.

It should be noted that a QA/QC manual is not a static document. As ATDP matures, so too will the manual be amended from time to time to accommodate changes in the ATDP’s operating environment.

This manual is not designed to reproduce in detail the standards to which ATDP aspires in its operations. Rather, where possible, the manual will refer the reader to the relevant standards and where those standards can be sourced.

Each item contained in the manual is described under 4 headings:

- **Heading**: defines the particular item which is subject to quality assessment.
- **Aim**: is an aspirational statement which defines ATDP’s goal(s) for that item.
- **Standard**: is the standard ATDP will use to define what is acceptable for quality purposes. It underpins the aspirational aim. In many instances, for ATDP this may be specified in government regulation or legislation.

- **Strategy**: defines the manner in which ATDP will measure actual performance against the standard. The outcomes determine the extent to which the standard is being achieved and thus quality assured. A disconnect between actual and standard performance forms the basis for quality control – or corrective action.
The manual is divided into 2 parts:

- Part I which introduces ATDP and outlines the QA/QC framework; and
- Part II deals with specific quality assessment matters. This section is subdivided into 3 sections:
  - Training & Development
  - Administration & finance; and
  - Outcomes

**ATDP’s QA/QC program:**

**Objectives:**

The objective of the QA/QS program is to establish and maintain a nationally consistent model of service delivery and administration which meets the expectations and needs of stakeholders and which is compliant to relevant statutory and regulatory frameworks.

ATDP’s program QA/QC program is built on the following principles:

| Excellence                      | Implementing processes which ensure that prescribed standards are achieved.  
|                                | Adopting methodologies to capture, record and evaluate key outcomes.  
|                                | Establishing quality assurance processes to ensure that activities are completed or delivered in a nationally consistent and timely manner.  
| Responsibility                 | Utilising a planned approach with measurable controls and processes.  
|                                | Ensuring a consistent institutional approach to QA/QC.  
|                                | Accepting that all ATDP people are responsible and accountable for implementing the assurance and improvement processes.  
| Access                         | Ensuring ATDP activities are underpinned by current policy and procedure.  
|                                | Implementing appropriate professional development and scholarship to ensure teaching quality and integrity is maintained.  
|                                | Providing a safe, well maintained and resourced learning environment.  
| Respect                        | Informing fully, supporting and treating all ATDP people and students equitably and with respect.  

Engagement

| • Providing opportunities for appropriate internal and external involvement in the maintenance of quality and standards. |

Accountability for the QA/QC program:

Whilst the responsibility for implementation rests with people at all levels within ATDP, the accountability for the QA/QC program rests with the SGB.

Responsibility for the QA/QC program:

The CFMG is responsible to the SGB for the development, maintenance and oversight of the QA/QC program.

Responsibility for implementation:

The responsibility for implementing ATDP’s QA/QC program rests with every member of the organisation at all levels - volunteers and employees alike.

It is therefore an expectation that every member of ATDP will become familiar with this manual and share a commitment to the QA/QC strategy.

QA Manager:

ATDP shall appoint a QA manager who will be responsible to the CFMG for all aspects of the QA program including audits, reviews and maintenance.

Commitment:

ATDP recognises that a planned and managed QA/QC program is essential to the realisation of that mission.

Quality cycle & continuous improvement:

ATDP endorses the concept that QA/QC is part of a process of continuous improvement. It is a managed activity involving planning, doing, reviewing and improving to drive the process of self-review, reflection and improvement.
**Reviews versus audits:**

ATDP’s AQ/QC program requires both regular review and ongoing audit.

- **Review** refers to the process in which the ATDP partnership undertakes an holistic review of the QA/QC model to ensure that it meets the needs of the partners and stakeholders in a changeable operational environment.

- **Audit**, on the other hand, refers to the process of determining actual performance against a set standard within the program. It forms the basis for any corrective action under the QC banner.

**Quality Reviews:**

ATDP adheres to the concept that its QA/QC program must be subject to ongoing and continuous review. The purpose of such reviews is to enable ATDP to be confident that the program itself meets its goals.

A review may be triggered in response factors including:

- The identification of risk, strategic need/opportunity, concern about performance on the basis of regular performance monitoring, benchmarking, previous reviews or other evidence;
- Major organisational or external environmental change, posing risks or creating opportunities;
- New and emerging regulatory or legislative requirements; and
- A planned cycle as part of the internal quality audit schedule.

**Assessment criteria:**

In undertaking reviews and audits, ATDP embraces the principle that they must be:

- Evidence based
- Efficient
- Rigorous
- Transparent
- Objective
ATDP
DRAFT
QUALITY ASSURANCE
PROGRAM

PART II
Practice, procedure & policy:

Aim:

ATDP is committed to developing, instituting and maintaining a robust system of governance in respect of administrative practices, procedures and policy. PPP includes forms used for administrative purposes.

Standard:

ATDP PPP will:

- Accord with reasonable standards of administration applicable to the APS, DVA and the VET sector generally
- Be consistent in format

Strategy:

Procedures, practices and policy shall be:

- Documented in plain English
- Contained in a National PPP folder
- Made freely available to stakeholders
- Promote nationally consistency
- Allow, where necessary or desirable, for regional specific requirements
- All PPP are to be approved by CFMG
- Subject to a defined system of periodic review and re-issue.

Each PPP will contain a date by which it is to be reviewed.

Assessment:

CFMG shall review the PPP folder on an annual basis.
Equity and access:

Aim:

ATDP is committed to ensuring that, as a VET provider, it is responsive to the individual needs of people whose age, gender, cultural or ethnic background, disability, sexuality, language skills, literacy or numeracy level or remote location may present a barrier to access, participation and achievement.

Standard:

ATDP will, where appropriate and practicable, comply with contemporary non-discrimination standards as they apply in the VET sector.

The standards are based in the following legislation:

- *Australian Human Rights Commission Act (1986)*
- *Age Discrimination Act (2004)*
- *Disability Discrimination Act (1992)*
- *Racial Discrimination Act (1975)*
- *Sex discrimination Act (1984)*

Strategy:

ATDP will:

- Develop and apply an equity and access policy which will be given the widest possible dissemination.

Assessment:

All complaints regarding equity and/or access are to be referred to the ATDP Secretariat. The secretariat will process any such complaint and make a report on any breach of policy to the CFMG at its next scheduled meeting.
**Financial management:**

**Aim:**

The ATDP is committed to ensuring that the development and delivery of advocacy training is undertaken in the most cost effective and efficient manner possible.

**Standard:**

ATDP financial operations will be managed in accordance with the Australian government financial management procedures and requirements contained in the Public Governance, Performance and Accountability Act 2013 (PGPA Act).

**Strategy:**

The PGPA Act was developed to provide the government with a financial management framework that would improve the line of sight between what is intended and what is delivered. It provides a basis for assessing whether the use of public resources – including funds contributed by taxpayers – is achieving meaningful results.

In the context of the ATDP this means that DVA needs to be in a position to report on the resources provided through the program and the results achieved. It is also important to ensure that the reporting process focusses not only on what was achieved but that this is related to what was required and how the funding was used to achieve these requirements.

For the members of the ATDP, in particular the ATDP governance committees, it means ensuring that funding decisions can be directly related to expected outcomes.

Fundamental elements of the performance framework approach, as it applies to the ATDP would revolve around the:

- initial budget development process,
- expenditure monitoring systems and
- financial and outcome reporting arrangements.

**Budget Development**

Overall budget management is the responsibility of the Strategic Governance Board (SGB) of the ATDP. The Capability Framework Management Group (CFMG) will provide advice to the SGB about the proposed training program identifying recommended activities and costs, taking into account projected need and identified priorities (including specific priorities identified by the SGB).
This includes the costs of planning and delivery but there needs to be a regular process for the development of spending proposals, and reporting on the usage and impact of that spending. The CFMG advice will be based on detailed business plans from each Regional Management Group and will need to focus on the expected benefits and associated costs of the proposed program.

To ensure that this is possible, Budget proposals need to be realistic, based on verifiable demand and cost data and Regional Managers need to ensure a common template is used for this purpose.

At the beginning of each financial year the Regional Management Groups are expected to prepare a business case outlining the proposed scope and cost of their planned activity for the year. The business case will:

- take into account any priorities identified by the SGB or CFMG for implementation in the coming year;
- identify each planned activity and expected outcome;
- include proposed resource needs and expected costs for each activity;
- ensure all cost and resource projections are evidence-based.

**Monitoring and Reporting**

Regions also need to keep a record of, and report about, activities and course delivery. Activities will include RPL, consolidation learning, continuous learning activities and engagement with communities of practice.

This is important to ensure that there is an ongoing focus on identified priorities and to monitor actual expenditure and outcomes against initial projections.

In order to ensure appropriate monitoring and control of expenditure all regions will institute a common budget development and expenditure control system to ensure that:

- All expenses incurred through the program are appropriately recorded and referred to DVA in a timely manner for payment;
- Expenditure is not incurred without appropriate authorisation;
- all assessors and trainers that are involved with the delivery of the ATDP are aware of their role in ensuring expenditure is appropriate and recorded;
- all assets are appropriately registered as DVA assets and managed in line with DVA requirements; and
- Provide regular reports to the CFMG.

To support the implementation of these systems, DVA will:

- pay all legitimate expenses on receipt of relevant invoices and will ensure these payments are properly assigned to the agreed charge codes;
- be responsible for the payment and arrangement of all travel associated with the delivery of the program; and
• ensure detailed monthly reports of expenditure are provided to each region in a timely manner.

Assessment
The quality of the financial budgeting and reporting process will be subject to ongoing assessment by the CFMG and SGB, as well as internally by each Regional Manager.
Privacy:

Aim:

ATDP uses personal information of individuals in its operations. ATDP is committed to ensuring that the collection, storage, use and disclosure of personal data is conducted in accordance with accepted community and legislated standards.

Standard:

ATDP will, where practical and appropriate, comply with the Australian Information Privacy Principles (IPPs) contained within the Privacy Act 1988 (cth) and the Data Provision Requirements 2012.

Strategy:

ATDP will:
- Develop and apply a privacy policy which will be given the widest possible dissemination; and
- Train relevant staff involved in the collection, storage, use and disclosure of personal information and the application of the IPPs as they relate to ATDPs operations.

Assessment:

Any complaints or breach of standards regarding privacy are to be referred to the ATDP Secretariat. The secretariat will process any such complaint and make a report on any breach of privacy to the CFMG at its next scheduled meeting.
Training & development

Compliance with national training regulations:

Aim:

ATDP is committed to ensuring that its training and development programs comply with relevant national VET standards and regulation.

Standard:

ATDP will apply the following regulatory instruments:
- Standards for VET accredited courses (as amended); and
- National Vocational Educational Education and Training Regulator Act (as amended)
- Standards for Registered Training Organisations (RTOs) (as amended)

Strategy:

ATDP will, through regular consultation, work with DVA (as the course owner) and the RTO to ensure that the program’s courses comply with national training standards and regulations. ATDP will also rely on ASQA’s power of audit.

Assessment:

The primary assessment tool will be:
- The continued accreditation of ATDP courses within the AQF by ASQA;
- The continued licensing of the RTO; and
- Any infringement notices that may be issued by ASQA pursuant to its legislated auditing powers.

Any infringement of these matters shall be referred to, and considered by CFMG as a matter of the highest priority.
Trainers (facilitators) and assessors:

Aim:

ATDP is committed to ensuring that the trainers (facilitators) who design and present the training program and the assessors who determine student competency are competent to undertake those roles.

Standard:

Trainers and assessors shall, at a minimum, meet the requirements set out in Standard 1 of the Standards for Registered Training Providers (RTOs) 2015 as amended or its successor standards.

Strategy:

No person shall be appointed as a trainer (facilitator) or assessor unless:

- She/he has completed a relevant Certificate IV (or higher) qualification; or
- Completed such appropriate and recognised qualification in the AQF as determined by the RTO in consultation with the NTM; and
- All appointments shall be approved by both the RTO and the National Training Manager.

The NTM shall devise student feedback and peer review instruments by which appointees can be appropriately assessed.

Assessment:

Trainers (facilitators) and assessors shall be subject to:

- Annual review by the RTO;
- Ongoing review by the NTM based on peer review and student feedback;
**Student rights:**

**Aim:**

ATDP is committed to ensuring that both students and prospective students are properly informed and protected in the ATDP training environment.

**Standard:**

ATDP shall, at a minimum, meet the relevant requirements set out in Standard 5 of the *Standards for Registered Training Providers (RTOs) 2015* as amended or its successor standards.

**Strategy:**

ATDP, in collaboration with the RTO shall develop both on-line and hard copy versions of a brochure which sets out the student’s rights and obligations.

**Assessment:**

Before the commencement of any training or assessment activity, ATDP staff are to ensure that students have read and comprehended the contents of the brochure.
**Student complaints:**

**Aim:**

ATDP is committed to implementing a fair, responsive and transparent system for dealing with student complaints. (NB complaints in the form of appeals against assessment MUST be referred direct to the RTO in accordance with the RTO’s procedures).

**Standard:**

ATDP shall, at a minimum, meet the relevant requirements set out in Standard 6 of the *Standards for Registered Training Providers (RTOs) 2015* as amended or its successor standards.

**Strategy:**

ATDP shall develop both on-line and hard copy versions of a brochure which sets out the student’s rights and obligations in respect of lodging complaints and complaint resolution.

Any complaint shall be lodged with and processed by the secretariat acting in its role of an independent body.

**Assessment:**

A summary of complaints lodged and resolutions achieved is to be provided to the CFMG at its next scheduled meeting.
Outcomes

Validation of training and assessment:

Aim:

ATDP is committed to ensuring that its training and assessment processes meet the needs of its client organisations.

Standard:

ATDP’s training program will be developed and monitored in close collaboration with its partners and client organisations.

Strategy:

ATDP will, in collaboration with its partners and clients, develop robust feedback instruments which are capable of providing reliable data by which the ATD program can be assessed.

Assessment:

The instruments will be managed (including distributed and analysed) by the secretariat with the results being delivered to the CFMG in the first instance.