

Leadership and Accountability Policy

Version 4.0

Reviewed on:

11.09.2025

Coverage

Outcome Standards for NVR Registered Training Organisations 2025

Quality Area 4 – Governance

Division 1- Leadership and Accountability

Standard 4.1 4.2

Policy

At ATQ College leadership and accountability are considered as core governance expectations. They are linked to the governing persons' responsibilities, compliance culture, and how ATQ College demonstrates integrity and transparency as well as identifying and mitigating risks

Definitions

Leadership is taken to refer to the governing persons of the RTO (directors, executives, senior managers) taking active responsibility for:

- setting a culture of compliance, integrity, and student focus,
- ensuring that training and assessment outcomes meet the quality requirements of the Standards,
- promoting continuous improvement, and
- providing strategic direction that supports sustainability and risk management.

Where this involves the active involvement of governing persons as *directly engaged* in overseeing compliance and quality — not delegating it away without monitoring through eg.

- **Governance culture:** Leaders must embed compliance and student protection into decision-making and organisational culture.
- **Decision-making:** Leadership ensures financial viability, conflict of interest management, and ethical use of third parties.
- **Student-centred outcomes:** All leadership actions must support quality training and fair outcomes for VET students.

Accountability

Accountability is understood to refer to the obligation of ATQ College governing persons and organisation to be transparent, answerable, and compliant in how its services and products are delivered, resources acquired and used and obligations to students, regulators, industry, and government met.

Where this involves

- **Transparency:** Providing accurate, up-to-date information about its services, scope of registration, ownership, and governance to ASQA, stakeholders and the public.
- **Responsibility:** Governing persons are personally accountable for compliance with the Standards — not just the organisation and that they all satisfy the Fit and Proper Person Requirements at all times

- **Record-keeping:** Accurate data reporting to NCVER/ASQA, secure student records, lawful data use.
- **Third party accountability:** Written agreements, monitoring, and disclosure when third parties are involved.
- **Regulatory obligations:** Undertaking all reporting Annual Declaration on Compliance, notification of material changes, and cooperation with ASQA.
- **Financial accountability:** Ensuring fees, refunds, and prepaid fee protection meet the Standards. As well as financial monitoring and planning to ensure to operate a financially viable business at all times

Procedure

1. Employ Fit and Proper Governing Persons

- Conduct due diligence checks (ASIC, bankruptcy, criminal, regulatory history).
- Ensure governing persons meet **Fit and Proper Person Requirements**.
- Record conflicts of interest and declarations.
- **Evidence:** Fit & Proper declarations, conflict of interest register, appointment letters.

2. Establish Compliance & Self-Assurance Culture

- Develop and endorse a **Compliance Policy** that sets expectations for integrity, student focus, and regulatory obligations.
- Communicate compliance responsibilities to all staff.
- Embed self-assurance by requiring evidence collection (not assumptions) for compliance.
- **Evidence:** Compliance policy, staff induction records, self-assurance reports.

3. Strategic & Operational Planning

- Incorporate risk management, compliance, and quality assurance into the RTO's **Business Plan**.
- Identify financial, student, third party, and compliance risks in the risk register.
- Align decisions with student outcomes and sustainability.
- **Evidence:** Business plan, risk register, meeting minutes.

4. Monitoring and Reviews (Governance Oversight)

- Schedule quarterly governance meetings to review compliance, financial viability, student outcomes, and risk register.
- Analyse complaints, feedback, and incident reports.
- Approve corrective actions.
- **Evidence:** Meeting minutes, risk register updates, corrective action reports.

5. Professional Development for Leadership & Staff

- Governing persons and senior staff complete **annual PD** in VET compliance, risk management, leadership.
- Trainers and assessors receive PD in training and assessment practices.
- Track completion and link to performance reviews.

- **Evidence:** PD plan, certificates of attendance, PD register.
- 6. **Internal Audits & Self-Assessments**
 - Conduct **annual internal audits** against the 2025 Standards.
 - Use self-assessment tools and student/industry feedback.
 - Document findings and corrective actions.
 - **Evidence:** Internal audit reports, action plans, evidence logs.
- 7. **Reporting Obligations (2025 Standards)**
 - Complete and submit the **Annual Declaration on Compliance** to ASQA.
 - Report AVETMISS data to NCVER via Training Services NSW (if funded).
 - Notify ASQA of material changes (ownership, scope, key personnel).
 - Maintain financial viability risk assessment data.
 - **Evidence:** Annual Declaration copy, AVETMISS submissions, notification records, FVRAS evidence.
- 8. **Third Party Management**
 - Enter into written agreements **before** third party delivery.
 - Monitor performance via audits, student feedback, trainer competency checks.
 - Notify ASQA of new/ceased agreements.
 - Require third parties to cooperate with audits and provide compliance data.
 - **Evidence:** Third party agreements, monitoring reports, audit records, ASQA notifications.
- 9. **Continuous Improvement & Accountability Reporting**
 - Collect feedback from students, staff, industry, regulators, and employers.
 - Analyse data and feed results into the improvement plan.
 - Report improvements back to governing persons and, where relevant, to ASQA or Training Services NSW.
 - **Evidence:** Feedback reports, continuous improvement register, updated procedures.