

Mr Scott Kompo-Harms  
Secretary  
Regulation Taskforce  
PO Box 282  
Belconnen ACT 2616

Dear Mr Kompo-Harms

**Re: Taskforce on Reducing the Regulatory Burden on Business**

I am writing in relation to the above matter which was the subject of discussions with Group Training Australia at our office in Sydney on Friday 25 November 2005.

I would like to take this opportunity to briefly document the principal issues that were raised by GTA about regulation and its effect on our industry. I believe these issues could be summarised as follows:

**1. National Standards for Group Training Organisations**

In May 2002, the ANTA Ministerial Council agreed that the National Standards for Group Training Organisations (GTO) be adopted, following a broad ranging national review of group training which included development of the standards, and that these standards would become the quality arrangements for group training in each State and territory from 1 January 2003.

Group Training Australia was party to the development of the standards and fully supports their introduction. This organisation has also participated in moderating workshops designed to assist the auditors appointed by State/Territory Training Authorities to conduct compliance audits, and has also participated in a more recent review of the standards and the evidence guides.

We are conscious of some suggestions that the audits can be intrusive, expensive and resource intensive and do not necessarily guarantee a quality product or a financially viable organisation. While this may be true, to the extent that no quality framework can provide such certainty, this organisation has taken the view that the standards provide some measure of assurance to both the employers who host group training apprentices and trainees but,

more importantly, to the apprentices and trainees themselves who rely on the GTO to manage their placements with those host employers.

However, Group Training Australia strives to ensure through the appropriate channels that the standards are robust, the evidence guides are comprehensive and the audits are conducted as consistently and transparently as possible across the country to minimise disruption to business and ensure the standards have maximum credibility. We have also argued that the audit process should be aligned as closely as possible to other audits to which our members might be subject, such as that for Registered Training Organisations (RTOs), to ensure that the audits do not duplicate each other.

## **2. Data Reporting**

We also raised the issue of duplication in our discussions with you in a broader context without being able, unfortunately, to give concrete examples. We indicated that our members often express frustration at reporting what they claim to be the same information to a range of institutions or government bodies. The plea of course is to remove the putative duplication by finding a way for the information to be reported to the one agency and shared or accessed by others as necessary.

As I have indicated, we do not have specific examples except to say that much of the information would relate to the reporting of details of the apprentices and trainees employed by our members. We would need to do a mapping exercise of these reporting requirements in order to be more specific but I suggest this kind of duplication is something you would already have encountered in your consultations.

## **3. Reporting to the Equal Opportunity for Women in the Workplace Agency (EOWA)**

We advised you that our members are required to report to EOWA under the provisions of the Equal Opportunity for Women in the Workplace Act. The legislation specifies that companies with more than 100 employees must develop strategies for addressing the employment related matters specified in the legislation.

As we indicated to you during our consultations, group training organisations (GTOs) have been advised that they must include their apprentices and trainees for the purposes of this threshold test which effectively brings most of them under the purview of the Act.

Many of our members have complained of the onerousness of this requirement in view of the fact that apprentices and trainees are not under the daily control and supervision of the GTO but rather are hired out to host employers who effectively determine who will be given access to their workplaces. This means that host employers can discriminate without acting

unlawfully making it very difficult at times for the GTO to enforce some of the employment related matters.

Our members have suggested that the requirement to include apprentices and trainees should be removed for the purposes of determining the application of the legislation leaving them only to report if their professional staff numbers exceed the threshold.

#### **4. Workers Compensation and Occupational Health and Safety (OH&S) Frameworks**

The final point we mentioned during our discussions related to the different workers compensation and occupational health and safety regimes in place around Australia.

Our principal concerns in this matter are outlined in our submission to the Productivity Commission's enquiry in June 2003. Our submission can be accessed from our website at [www.grouptraining.com.au](http://www.grouptraining.com.au) >National Association> About GTA>Members Services> Reports and Speeches> June 2003

Our concern where your inquiry is concerned centres on the different jurisdictional requirements in relation to both workers compensation and OH&S at a time when more of our members are operating interstate. The effect is an increase in administrative costs as the companies are forced to comply with the different regimes. The standardisation of these requirements, quite apart from the other reforms recommended in our submission, would be well received by most businesses.

I hope that this summary assists you in preparing your report. Should you wish to obtain additional information on any of the matters raised please do not hesitate to contact me on 02 9299 6099.

Yours sincerely

Jim Barron  
CEO

29 November 2005