

Third Party Arrangements - Third Party Arrangements Procedure (VET)

Section 1 - Summary

(1) This Procedure outlines the responsibility for, and processes involved in, engaging third parties to deliver and/or assess vocational education and training (VET) qualifications on behalf of Victoria University, (VU) Polytechnic. The Procedure addresses the Polytechnic's responsibilities in relation to:

- a. the National Vocational Education and Training Regulator (Australian Skills Quality Authority [ASQA]), including the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS);
- b. the Victorian Registration and Qualifications Authority (VRQA); and
- c. the Victorian Department of Education and Training (DET) VET Funding Contract.

Section 2 - HESF/ASQA/ESOS ALIGNMENT

(2) [Standards for Registered Training Organisations \(RTOs\) 2015 \(Cth\)](#): Standards 2, 4, 5 and 6.

Section 3 - Scope

(3) This Procedure is applicable across the University's VET operations, including when establishing and managing third-party arrangements for the delivery and/or assessment of Vocational Education programs in Australia and offshore.

Section 4 - Definitions

(4) Nil

Section 5 - Policy Statement

(5) See [Third Party Arrangements Policy](#).

Section 6 - Procedures

Part A - Summary of Roles and Responsibilities

Roles	Responsibilities
Victoria University Polytechnic Managers / Directors	<ol style="list-style-type: none"> 1. Identify business opportunities, benefits, associated revenue and cost and associated risks of working in partnership with a third party and make recommendations in writing using the VET Third Party Proposal, Business Case and Costing Tool to the Deputy Vice-Chancellor, Vocational Education. 2. Conduct due diligence reviews of proposed partners for projects and advise Senior Leadership Team of outcomes. 3. Consult with Legal Services for projects and customise the Draft Agreement.
Senior Leadership Team	<ol style="list-style-type: none"> 1. Assess recommendations to engage with a third party for the delivery of education and training services. 2. Review due diligence outcomes.
Deputy Vice-Chancellor, Vocational Education	<ol style="list-style-type: none"> 1. Notify regulatory and funding bodies - ASQA, VRQA and DET - in writing of all new third-party arrangements and seek prior approval as required.
Pro Vice-Chancellor, Vocational Education and Pathways	<ol style="list-style-type: none"> 1. Inform Legal Services of any notifications of changes to obligations and reporting requirements by regulatory bodies. 2. Update the Responsibility Matrix in line with changes imposed by regulatory bodies and/or identified internal continuous improvement actions.
Legal Services	<ol style="list-style-type: none"> 1. Develop a standard contract for VET Third Party Arrangements. 2. Develop and maintain due diligence tool to be used for assessing the suitability of prospective partners. 3. Periodically review Third Party contracts and matrix of responsibilities.
Quality and Compliance	<ol style="list-style-type: none"> 1. Review the Agreement in compliance with the Standards for RTOs 2015 and other relevant regulatory bodies and legislation. 2. Track and report on Third Party Arrangements as required by Department of Education and Training and ASQA. 3. Conduct an internal audit of Third Party Arrangement courses against the Standards for RTOs 2015 and the VET Funding Contract.
Victoria University Polytechnic Directors	<ol style="list-style-type: none"> 1. Liaise with VUI about the delivery of any services to international students. Manage the contract execution process. 2. Appoint a Contract Manager. 3. Overall responsibility for all services delivered by the third party, both on and off-shore, in line with regulatory body requirements. 4. Overall responsibility for ensuring any recruitment or brokering services delivered through third party arrangements conform to regulatory body requirements. 5. Ongoing monitoring of contract and associated reporting requirements.
Victoria University Polytechnic Managers	<ol style="list-style-type: none"> 1. Liaise with the relevant partner Project Manager to complete the Victoria University Polytechnic - Quality Responsibilities Matrix; Third Party Agreements for Training and/or Assessment of Nationally Recognised Programs. 2. Finalise costing/pricing for projects.

Roles	Responsibilities
Contract Manager	<ol style="list-style-type: none"> 1. Oversee the third-party arrangements, including the identification of potential risk or issues. 2. Initiate negotiation of responsibilities using the Polytechnic Quality Responsibilities Matrix to record individual responsibilities for each key area. 3. Liaise with Finance and manage the payment schedule. 4. Liaise with VU services, e.g. Marketing, Enrolments etc., about third-party arrangements. 5. Ensure training to third-party staff in relation to VU procedures, e.g. Authorised Enrolment Officer training, resulting etc. 6. Keep a register of Third-Party Arrangements. 7. Ensure the publishing of third-party arrangements and potential/existing students are aware of such arrangements. 8. Ongoing monitoring and annual review of agreements and associated reporting requirements.

Part B - Procedures

(6) Victoria University Polytechnic Managers and/or Directors will identify business opportunities, public benefits and associated risks of working in partnership with a third party and make recommendations in writing (Business Case and Costing tool) to the Deputy Vice-Chancellor, Vocational Education.

(7) A due diligence review of the proposed partnership is undertaken by the Manager or Centre Director and reported to the Senior Leadership Team. Legal Services are consulted as part of the due diligence review and probity check.

The VU Legal [Due Diligence Checklist](#) is to be used as a guide to this process and decision making, not as an exclusive indicator.

For projects whose projected revenue is up to \$500,000, due diligence checks to be completed within 5 working days. For projects with projected revenue of \$500,000 or above, due diligence checks to be completed within 10 working days of the request.

The Deputy Vice-Chancellor, Vocational Education with the Senior Leadership Team, will assess the recommendations (Business Case, Costing Tool, due diligence evidence) to engage with a third party for the delivery and/or assessment of education and training services in line with the relevant regulatory requirements.

(8) The Deputy Vice-Chancellor, Vocational Education to notify regulatory bodies - ASQA and VRQA - in writing of all new third-party arrangements and seek prior approval from the Victorian Department of Education and Training (DET) as required:

- a. To notify ASQA, use the Third Party Service Notification Form which is accessed and submitted via ASQAnet/Notifications/Third-Party Arrangements. Notification made within 30 days of program commencement.
- b. To obtain prior written approval to proceed from the Victorian Department of Education and Training for subcontracting of training and assessment by a third party in compliance with Clause 6 of the VET Funding Contract.

(9) The Deputy Vice-Chancellor, Vocational Education to notify DET of Brokering Services entered into within 30 days of entering into any arrangement.

- (10) The Pro Vice-Chancellor, Vocational Education and Pathways will ensure that any changes to obligations and reporting requirements by regulatory bodies are reflected in the Agreement or Responsibilities Matrix.
- (11) The VU Polytechnic Directors will liaise with VU International senior officers about all international delivery contract execution and management matters.
- (12) Before finalisation of the Agreement, the VU Polytechnic Manager will liaise with the relevant partner Project Manager and complete the Victoria University Polytechnic - Quality Responsibilities Matrix; Third Party Agreements for Training and/or Assessment of Nationally Recognised Programs, clearly articulating responsibilities for each aspect of the program.
- (13) After completing the matrix, VU Polytechnic Managers will finalise costing/pricing for the project taking into consideration the responsibilities allocated to the Polytechnic and use of Polytechnic copyrighted documentation and templates for the program. Directors will manage the contract execution process.
- (14) VU Polytechnic Directors will liaise with the relevant Contract Manager to provide direct contact with third parties and monitor activities in line with the Polytechnic's quality system and regulatory bodies' requirements.
- (15) The Contract Manager will be responsible for the oversight of the third party arrangements, including identification of potential risks and corrective actions required to manage risk, as well as ensuring regulatory bodies' requirements are met and provide regular reports to the relevant Polytechnic Director.
- (16) The Contract Manager will liaise with Finance and manage the payment schedule.
- (17) The Contract Manager will liaise with VU services, e.g. Marketing, Enrolments etc., about third-party arrangements.
- (18) The Contract Manager will ensure relevant training to third-party staff in relation to VU procedures, e.g. Authorised Enrolment Officer training, resulting etc., along with relevant notifications from regulatory bodies.
- (19) The Contract Manager will ensure third-party arrangements are published, and potential/existing students are fully aware of such arrangements.
- (20) The Polytechnic Directors are responsible for all services delivered by third parties - both on and off shore - including: providing data; co-operating with regulatory bodies such as ASQA, VRQA and DET; complying with the Education Services for Overseas Students Act 2000, meeting the requirements for CRICOS registration, complying with advertising and marketing standards; informing prospective students about courses and course admissions requirements; dealing with complaints and appeals; collecting fees; and recordkeeping.
- (21) The Polytechnic Directors and Contract Manager are responsible for the ongoing monitoring of contract and associated reporting requirements. In particular:
- a. Initial site visit before finalising the agreement.
 - b. Set up a monitoring schedule that will include at least one audit of activity at the partner organisation each semester and at least two site visits each year.
 - c. Conduct systematic monitoring, taking corrective action as necessary.
 - d. Ensure that the partner understands and complies with the requirement to make themselves and course / staff / student documentation available at short notice to the VU Polytechnic, DET and the national VET regulator.

Section 7 - Guidelines

(22) Nil

Status and Details

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