SUBMISSION TO THE PRODUCTIVITY COMMISSION ON THE VOCATIONAL EDUCATION AND TRAINING WORKFORCE

INTRODUCTION

The National Quality Council (NQC) is providing advice to this study at the request of the Productivity Commission and notes that the Terms of Reference for the *Education and Training Workforce Study – VET Workforce* are to examine issues impacting on the workforce in the VET sector, including supply and demand issues and to provide advice on workforce planning, development and structure in the short, medium and long-term.

The NQC acknowledges that a comprehensive study of the VET workforce needs to look at the broader policy context but advises that the study should not seek to actively participate in the policy debate around issues which are within the remit of the NQC such as Training Package design and the VET regulatory framework.

The NQC agreed at its meeting of 17 June 2010 that it could best support the work of the Productivity Commission by providing in its formal written response an explanation of the role of the NQC and a summary of current NQC policy on issues raised in the Issues Paper, *Vocational Education and Training Workforce* (June:2010). In doing so, this response provides comment on the NQC's role and responsibility for standards setting in relation to Training Packages and the AQTF; the capability requirements of those delivering, implementing or assessing the standards; and what research undertaken by the NQC has highlighted as requiring capability building in the VET workforce.

ROLES AND RESPONSIBILITIES OF THE NQC WITHIN THE VET SECTOR

The NQC brings together the major players in the vocational and technical education sector - industry, unions, governments, equity groups and practitioners - in the oversight and support of the current and future quality of vocational and technical education across Australia. It has a critical role in ensuring the successful operation of the National Skills Framework – the system's requirements for quality and national consistency in terms of qualifications and the delivery of training.

The NQC has direct responsibility within the Australian VET sector as a standards setting body, with an oversight role in regard to the operation of the National Skills Framework, including the endorsement of AQTF standards and other quality assurance arrangements as well as endorsement of Training Packages. It also has a direct policy role in support of the AQTF and in providing direction to the design of Training Packages.

The VET sector is bound by the standards set by the NQC and policy it develops in support of those standards. *Implementation* of its decisions is the responsibility of other players in the VET sector, for example, Registering and Course Accrediting Bodies (RCABs) have responsibility for application of the AQTF Standards. The NQC develops policy governing the design of Training Packages and publishes guidelines for their development through the Training Package Development Handbook while Industry Skills Councils (ISCs), under contractual arrangements with the Commonwealth, have responsibility for their development and for the presentation of finalised packages for endorsement of the NQC, while RCABs have responsibility for monitoring the compliance of RTOs with training package requirements.

Standards setting is a complex activity which includes ongoing monitoring and review. Through its Work Plan, the NQC monitors and reviews the standards it sets and undertakes a range of research activities to support policy development in support of the Standards. Its standards setting work gives the NQC the capacity to provide advice and recommendations for policy concerning the operation of the National Skills Framework to the Ministerial Council for Tertiary Education and Employment.

A brief overview of the roles and responsibilities of MCTEE in the VET sector is included at <u>Attachment A</u> in order to clarify the relationship between the NQC and MCTEE. It is expected that detailed advice outlining the responsibilities of MCTEE will be provided to the Commission by MCTEE.

The NQC's role in oversight of the Australian Quality Training Framework (AQTF)

The AQTF is the national set of standards designed to assure nationally-consistent training and assessment services for the clients of Australia's VET sector and applies to the audit and registration of RTOs and the accreditation of courses. AQTF includes standards designed to assure the quality of these core functions of the VET sector, and to support a nationally consistent approach to the regulatory functions undertaken by RCABs. The NQC monitors and has recommended approaches to improve national consistency within RCAB applications of the AQTF standards.

As noted, the NQC endorses the AQTF Standards. *Application* of the Standards, including the registration and audit of Registered Training Organisations (RTOs) and the accreditation of courses, is the responsibility of RCABs or their delegates. Application of the Standards is *monitored* by the NQC, and RCABs are required to report AQTF activity on an annual basis.

COAG identified significant issues in 2009 in regard to delivery to international students. As a consequence, the NQC undertook a review of the AQTF which had the objective of strengthening the AQTF. In its review of the existing Standards, the NQC agreed to increase requirements that would apply to both applicants seeking initial registration as RTOs and to existing RTOs seeking to maintain registration. It also sought to harmonise the requirements of the AQTF with those advocated in the Baird report, *Stronger*, *simpler*, *smarter ESOS: supporting international students; a review of the Education Services for Overseas Students (ESOS) Act 2000*, final report – February 2010 and in so doing provide a coherent and simplified view of requirements which would better support both domestic and international students.

The work has resulted in new and revised standards – the AQTF Essential Conditions and Standards for Initial Registration and the AQTF Essential Conditions and Standards for Continuing Registration together with revised national guidelines and supporting documentation.¹ While the AQTF has been updated, further work is underway to provide clarification of particular aspects which have not yet been resolved and the NQC continues to have these matters under consideration. Also to be completed is the NQC's review of the Quality Indicators for RTOs to determine the extent to which they reflect their intended aims, to support a continuous improvement approach by RTOs and to provide a tool to be used by RCABs to support risk assessment processes.

Additionally, while the revised AQTF has strengthened standards applicable to the provision of training and assessment services to domestic students (including international students studying in Australia), the NQC is also currently

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¹ All AQTF documentation may be found at www.training.com.au

considering issues identified in relation to the quality assurance of the offshore delivery of Australian VET qualifications as identified in its research in 2009. This work provides consideration of the need for enhanced risk management guidelines within the AQTF.²

The NQC's role in oversight of Training Packages

A Training Package is a set of standards and qualifications developed by industry and used to recognise and assess the skills and knowledge a person needs to perform effectively in the workplace. Training Packages are a key resource for RTOs in the design and delivery of structured training and provide for nationally recognised assessment outcomes.

The NQC consulted widely within the VET sector in 2009 in its review of the design of Training Packages and associated documentation. While the review found broad support for the key pillars of Australia's VET system: one single national system, with industry-determined outcomes relevant to work, reflected in nationally portable qualifications, it signalled some key areas of reform to ensure that the VET sector can accommodate the diverse needs of businesses, industry and individuals. Necessary reforms were identified around the need to revise the current definition of competency, restructuring and streamlining Training Packages, and a review of packaging rules to provide maximum flexibility and consistency of outcomes.

The NQC's 2010 Work Plan includes a project which will streamline Training Packages, over time making them more understandable, usable and accessible for trainers and assessors. Clearer information on how to implement a Training Package will contribute to the improved capability of trainers and assessors.

THE NQC'S ROLE IN CAPABILITY BUILDING OF THE VET WORKFORCE

Relationship between standards setting and policy

Policy advice – NQC Determination of Training and Assessment Competencies to be held by trainers and assessors

AQTF Standard 1 (element 1.4) establishes that the NQC will determine the competencies to be held by trainers and assessors in the VET sector. NQC made such a Determination in respect of competencies in the TAAO4 Training and Assessment Training Package (on 29 March 2007), to clarify its requirements and to support a consistent approach in the application of the AQTF Standard. In particular, the Determination sought to clarify what is considered to be acceptable qualifications in the development of the pedagogical skills of trainers and assessors as this had been identified as an issue within the VET sector. Ongoing monitoring by the NQC indicated the industry view that there was a need to further clarify the NQC's Determination that trainers and assessors

² The report, Offshore Quality Assurance Monitoring against the AQTF is at http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0008/53387/Offshore Quality Assurance - Final Report.pdf

hold, in addition to pedagogical skills, *vocational competencies at least to the level being assessed*. Vocational competency is seen by industry as one of the critical components by which assessment outcomes in the VET sector may be quality assured.

The NQC updated its Determination to provide additional text to define vocational competency in its Determination of 18 December 2009. It updated it again on 17 June 2010 to reflect the newly endorsed TAE10 Training and Education Training Package. A link to the NQC's Determination is provided at Attachment C.

At the same time, the NQC considered a range of Training Packages to determine the advice currently given by industry in Training Packages regarding the vocational competency of assessors and found such advice to be sometimes unclear and variable in quality and detail and so provided for differing interpretation by RTOs. In order to provide clarity to industry in terms of the advice it might provide in relation to assessor competencies, it agreed to update the Assessment Guidelines in the Training Package Development Handbook and to include a series of questions to prompt Training Package developers in the provision of advice regarding industry requirements for the vocational competencies of assessors (at Attachment D).

The NQC will monitor the impact of its policy decision to enable greater clarity of industry advice regarding both the pedagogical and vocational competency of trainers and assessors to determine whether industry is satisfied that this provides better assessment outcomes for industry.

From time to time, in monitoring the efficacy of the standards it has set, the NQC may undertake a national strategic industry audit of a specific Training Package qualification. A national strategic industry audit enables the NQC to gain an Australia-wide perspective of the operation of the National Training Framework in one industry through consideration of a sample of RTOs delivering, assessing and issuing AQF qualifications and statements of attainment in a particular industry or industry sector, and is conducted collaboratively with the states and territories. The NQC currently has under consideration the outcomes of its national strategic industry audit of TAA40104 *Certificate IV in Training and Assessment*. The audit aimed to identify implementation issues which impact on the quality of the delivery and assessment of this pivotal qualification within the VET sector.

Pedagogical and vocational competency requirements for trainers and assessors within the VET sector are perceived by the NQC to be of vital significance in quality assuring the core business of the VET sector, which is to provide training and assessment services. The NQC continues to have its policy regarding the quality assurance of training and assessment under consideration. While the recently endorsed TAE40110 *Certificate IV in Training and Assessment* represents a lifting of the bar, the NQC will monitor the new requirements of its updated Determination during the two year transition period it has set. In addition, the NQC's 2010 Work Plan includes a second stage to its National Strategic Industry Audit of TAA40104 *Certificate IV in Training and Assessment* which aims to pull together and connect the audit findings together with the review of the qualification undertaken by Innovation and Business Skills Australia (IBSA). The IBSA review focused on design and fitness for purpose of the package. The NQC's Stage 2 work will aim to understand and draw conclusions about the interaction between design and fitness for purpose issues and the effect on delivery and implementation of the package by RTOs and vice versa, and provide recommendations for addressing the issues in a holistic way.

Advisory role

Through the *National Skills and Workforce Development Agreement* (2008) responsibility for capability building of the VET workforce rests with states and territories, and through the AQTF, with the RTO. This agreement rolled national funding for VET workforce development into state/territory recurrent funding for VET. Responsibility for VET workforce capability building thus passed to states and territories to manage in line with the specific needs of their jurisdictions.

While the NQC has a *policy* role in terms of identifying competency requirements of trainers and assessors, the NQC agreed it also has an *advisory* role in providing advice to States and Territories on VET workforce capability building priorities identified through its policy work. It agreed that there was value in retaining a national focus on national VET workforce development, especially in support of the achievement of the targets set by the COAG reform agenda for development of the Australian workforce by the year 2020. Further, it agreed that NQC advice can provide a guide to activity by states and territories and may support consistency of approach to common problems.

Low levels of industry confidence in VET assessment were confirmed through research undertaken by the NQC in 2006³ and much of the NQC's research work since that time has considered the development of policy to address this issue.

The **quality of assessment** has been identified by the NQC as a common issue in its ongoing policy development work. States and territories were advised at the end of 2009 of the groups requiring capability building and the issues identified:

- Assessors in applying contemporary assessment practices;
- AQTF auditors in understanding what constitutes good assessment practice and being able to communicate that to RTOs at the time of audit; and
- RTOs in supporting partnerships with industry/enterprises, including in approaches to assessment.

Details of the research that has supported the NQC's development of advice in this regard are at <u>Attachment B</u> and have been included because their findings consistently indicate specific capability needs of the VET workforce. Not all the recommendations from the reports cited have been endorsed as NQC policy. A number of recommendations remain under the NQC's consideration and many have required further research, which in a number of cases continues to be ongoing.

The NQC's work in 2010 builds on work undertaken in the past several years and continues to focus on the NQC's priority of enhancing the quality of assessment in the VET sector and to lift levels of industry confidence in VET assessment outcomes. Current research of the NQC includes the development of models to support the use of validation and moderation as ways of supporting the consistency of assessment outcomes while also supporting the revised AQTF Standard 1.5.d, in which the NQC states its requirement for assessment to be systematically validated. Other ongoing work includes a scoping project to explore the feasibility of the establishment of an assessment materials clearing house, and researching strategies by which the current unevenness of available assessment support materials in priority areas might be addressed. It is likely that ongoing policy development work of the NQC will provide further insights into the capability needs of the VET workforce.

³ In the report *Investigation into Industry Expectations of Vocational Education and Training Assessment* (NQC:2006)

Attachments

- Attachment A: Roles and responsibilities of MCTEE in the VET sector
- Attachment B: Summary of NQC research activity which has provided the basis of its advice to states and territories for priorities for VET workforce capability building
- Attachment C: NQC policy requirements- NQC Determination of Training and Assessment Competencies to be held by trainers and assessors (June 2010)
- Attachment D: NQC policy advice: clarification of advice that may be provided by industry regarding specific requirements of assessors within Training Packages
- Attachment E: Carrots, sticks, a mix, or other options: a scoping report which considers the feasibility of options for a systematic approach to capability development of trainers and assessors

Roles and responsibilities of MCTEE in the VET sector

Under the 2008 National Agreement for Skills and Workforce Development, MCTEE has overall responsibility for the national training system. This includes strategic policy, priority setting, planning and performance, and key sectoral cross sectoral issues impacting on the national training system, such as skills forecasting, workforce planning (including skills needs) and articulation between higher education and vocational education and training.

MCTEE is supported by a number of key Committees in accordance with the national governance and accountability framework for the national training system. These include:

- <u>National Quality Council</u> (NQC) which oversees quality assurance and ensures national consistency in the application of the AQTF standards and audit and registration of training providers
- <u>National Senior Officials Committee</u> (NSOC) which provides the administrative arm of MCTEE and is responsible for supporting the MCTEE, implementing its decisions, driving national collaboration on training matters and monitoring effectiveness of the system
- A range of <u>Action Groups</u>, established by NSOC as agreed by the MCTEE on a needs basis and for a fixed period. Action Groups are currently in process of being replaced by a number of <u>Principal Committees</u>, among them being the Workforce Development Supply and Demand Principal Committee.

COAG agreed to establish new structures for national regulation in December 2009. It agreed to establish a <u>National Standards Council</u> which will provide advice to the MCTEE on national standards for regulation including registration, quality assurance and accreditation of VET qualifications but will also extend the current roles and responsibilities of the NQC.

It also agreed to establish a new <u>national regulator</u> which will be responsible for the registration and audit of RTOs and the accreditation of courses from 2011. All jurisdictions except Victoria and WA have agreed to refer powers to the Commonwealth to establish the national regulator.

Summary of NQC research activity which has provided the basis of its advice to states and territories for priorities for VET workforce capability building

The NQC has a charter to oversee and support the current and future quality of vocational and technical education across Australia. The priority given by the NQC to enhancing the quality of assessment in the VET sector is informed by its research over the past three years. It should be noted that findings and recommendations from the reports provided do not necessarily represent NQC policy but have been included because their findings consistently indicate specific capability needs of the VET workforce.

The advice the NQC has provided to states and territories has been informed by the following research activities:

Investigation into industry expectations of vocational education and training assessment (NQC: 2008). This research arose out of reports which raised concerns on the part of industry and regulators about the quality and integrity of registered training organisation (RTO) assessment, particularly perceptions that learners are being deemed competent inappropriately. The report identified a range of potential points of intervention, which included

- Training package development to include clear conditions for assessment;
- Training and ongoing professional development of assessors to support capability building;
- Wider adoption of validation and moderation as important tools in the management of quality assessment;
 and
- Building stronger relationships between enterprises and RTOs (for current employees undertaking training)

This report may be downloaded at

http://www.nqc.tvetaustralia.com.au/nqc publications/nqc reports/vet assessment report

Quality of Assessment Practices (Stages 1 and 2) (NQC: 2009). While acknowledging the significant development work that has occurred over the last decade, this research indicated that some of the problems with the quality and consistency of assessment highlighted in the late 1990's remain to be resolved. It found that improving the quality of assessment requires

- Building assessment expertise within the VET sector and an understanding of contemporary assessment practices;
- Providing clear benchmarks for assessment within units of competency;
- Ensuring that assessment is an integral part of the learning process rather than being limited to a summative exercise;
- Building the status and capability of assessors by reviewing the design of trainer and assessor qualifications
 and by investigating the feasibility of establishing an assessor registration system linked to a professional
 development framework;
- Improving assessment quality assurance by supporting the effective implementation of AQTF and ensuring that AQTF auditors, RTO assessors and RTO staff with responsibility for AQTF;
- Developing support materials that address the current gaps in assessment support materials those which address current and emerging assessment issues

- Providing high quality, industry endorsed model assessment materials and developing a maintenance strategy for materials developed;
- Investigating the feasibility of establishing a clearing house for assessment materials available in the public domain.

This report may be downloaded at

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0007/49660/Quality of Assessment Practices - Stage 1 Report - Part A - Optimised.pdf

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0008/49661/Quality of Assessment Practices - Stage 1 Report - Part B - Optimised.pdf

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0009/50976/Quality of Assessment Practices - Stage 2 Report.pdf

National Approach to Moderation to Improve Consistency of Assessment (NQC: 2009)

This project had the objective of improving national consistency within the operation of the National Skills framework through the development of a national approach to validation and moderation of assessment in the VET sector, through a case study/ action learning approach and the development of models with wider applicability. Products developed through this project include

- An implementation guide: validation and moderation;
- A guide for developing assessment tools; and
- A code of professional practice.

These products may be downloaded at

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0010/51022/Validation and Moderation - Code_of_Professional_Practice.pdf

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf_file/0011/51023/Validation_and_Moderation - Guide for developing assessment tools.pdf

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0012/51024/Validation and Moderation - Implementation Guide.pdf

A series of national information sessions were conducted by the NQC late in 2009 to disseminate information regarding the outcomes of this project, together with outcomes of the *Quality of Assessment Practices (Stages 1 and 2)* report. The NQC noted the high degree of interest and participation in the information sessions across all jurisdictions and the recommendation from the project that a more targeted, sustained and systematic approach to building assessment related capability in the VET system is needed. It has provided this advice to states and territories through NSOC.

Products from the national communication and dissemination strategy may be downloaded at

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0005/53798/Enhancing comparability of standards thr ough validation and moderation.pdf

http://www.nqc.tvetaustralia.com.au/__data/assets/pdf_file/0006/53799/Quality_of_Assessment_Practice.pdf

In its 2010 Work Plan, the NQC is extending its research in relation to validation and moderation in the development of further models that might be used by the diversity of RTOs within the VET sector.

It is also currently investigating further the recommendations from the Quality of Assessment Practices Stage 2 report. This work aims to enhance the quality of assessment in the VET sector by investigating the feasibility of a clearing house for assessment resources; preparing a strategy to address gaps in assessment support materials and developing a template for reference/fact sheets on assessment related issues.

Industry/enterprise and RTO partnerships (NQC: 2009)

Using an action learning approach, this project aimed to improve the responsiveness of training to industry and employer needs by identifying, documenting and disseminating best practice examples of partnerships and new ways of working between RTOs and industry/ enterprises to adopt more innovative, flexible approaches to training and skills.

This report may be downloaded at

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf_file/0009/51021/Enterprise_RTO_partnerships_VET_Workforce_Development_final_report_All_Optimised.pdf

In its 2010 Work Plan, the NQC is building on the outcomes of its earlier work through the development of guidelines for both RTOs and industry and will disseminate these materials through national information sessions.

Alternative Frameworks for the Recognition of Workplace Training (NQC: 2009)

This scoping project was commissioned to

- Investigate alternative frameworks for workplace recognition; and
- Provide advice on the nature of a broader recognition policy.

While recognising that Recognition of Prior Learning (RPL) is an important mechanism for recognising skills attained through workplace learning, the study identified five other approaches that are currently used or have the potential to be used for recognising the outcomes of workplace learning in Australia. These are

- Provider based workplace assessment services;
- Industry based assessment systems;
- Trades skills recognition;
- Using enterprise business procedures to meet VET assessment requirements; and

• Credit rating of workplace learning.

The report may be downloaded from

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf_file/0003/49764/Workplace_Training_Report.pdf

NQC policy requirements- NQC Determination of Training and Assessment Competencies to be held by trainers and assessors (June 2010)

The Determination is published as Appendix 2 and 3 to the AQTF *Users' Guide to the Essential Conditions and Standards for Continuing Registration* at

Note that Appendix 2 and 3 to the AQTF Users' Guide to the Essential Conditions and Standards for Initial Registration is varied to have applicability to applicants seeking initial registration, and may be found at http://training.com.au/documents/Dezem_100610%20User%20guide%20for%20initial%20registration_290610%20FINAL%20FOR%20WEBSITE%208JULY.pdf

NQC policy advice: clarification of advice that may be provided by industry regarding specific requirements of assessors within Training Packages

See: http://www.deewr.gov.au/Skills/Programs/TPDH/downloads/Pages/Downloads.aspx and http://www.deewr.gov.au/Skills/Programs/TPDH/assessmentguidelines/Pages/PolicyAssess.aspx#avc (section 4) respectively. Also see http://www.deewr.gov.au/Skills/Programs/TPDH/Pages/revisions.aspx.

Text for inclusion in the Training Package Development Handbook under Assessment Guidelines to describe vocational competence of assessors

Text Box 5: Assessment Guidelines policy

Add (Assessment Guidelines policy – Mandatory Text):

Advice to Assessors on vocational competence:

Training Package developers must provide advice within the Assessment Guidelines mandatory text about industry's clear directions on the vocational competence and experience for assessors, to ensure that they meet the needs of industry and their obligations under the AQTF.

Advice should include:

- relevant industry advice related to the vocational competencies of assessors, including relevant industry qualifications and/or competencies and relevant industry experience for assessing against the Training Package or for specific qualifications within the package and
- advice outlining what industry sees as acceptable and relevant forms of evidence to demonstrate the maintenance of currency of vocational competency.

Prompts to Training Package developers in the provision of advice regarding industry requirements for the vocational competency of assessors

1. Are training and Assessment qualifications required for delivery of the XXX Training Package?

If yes, specify the training and assessment qualifications that must be held by assessors in the XXX industry in compliance with the AQTF

Include information describing options for a team approach to assessment.

- 2. What evidence is acceptable to the training and assessment industry to demonstrate the currency of vocational competence and that this is maintained as *trainers/ assessors*
- 3. Are industry vocational qualifications required for delivery of the XXX Training Package?

If yes, indicate the *industry* qualifications or knowledge and skill requirements that are required as appropriate to the Training Package as a whole and/or to individual qualifications or job roles if appropriate.

4. Is industry vocational experience required for delivery of the XXX Training Package?

If yes, identify what vocational experience is required and whether this is required following completion of an industry qualification, and define the industry context within which experience is accepted as appropriate to the industry.

5. Do licensing /registration/ permit requirements apply to qualifications and units of competency within the XXX industry

If yes, identify the qualifications/ units of competency, what licensing/ registration or permit requirements apply, whether there are any additional requirements that assessors must meet, and links for further information.

6. What evidence does the XXX industry accept in the demonstration of currency of vocational competence?

Carrots, sticks, a mix, or other options: a scoping report which considers the feasibility of options for a systematic approach to capability development of trainers and assessors (NQC: 2010)

This project examined recognition, reward and registration options as a strategy for building the capability and status of assessors and the models/ options available.

It recommended that

- a systematic approach be used to enhance capability building within the VET sector
- that any strategy policy aimed at capability building be designed in such a way that the capability of *all* VET trainers and assessors be addressed
- that both the humanistic approach (including recognition and reward schemes and access to networking opportunities) and the behavioural approach (including public awards) be used to support capability building
- that consideration be given to the establishment of a developmental regulatory policy to encourage and acknowledge capability building

While the report has not been endorsed by the NQC and Council advises that the report provides initial recommendations and that much more work needs to be done, the report has been provided to MCTEE for consideration of the Regulation, Quality Assurance and International Engagement committee with a view to informing any work on the development of a national strategy aimed at building the capability of the VET workforce. The NQC also agreed that the report be provided to the Productivity Commission to inform the VET Workforce Review. The report may be downloaded at:

http://www.nqc.tvetaustralia.com.au/ data/assets/pdf file/0011/53795/Carrots and Sticks Report.pdf