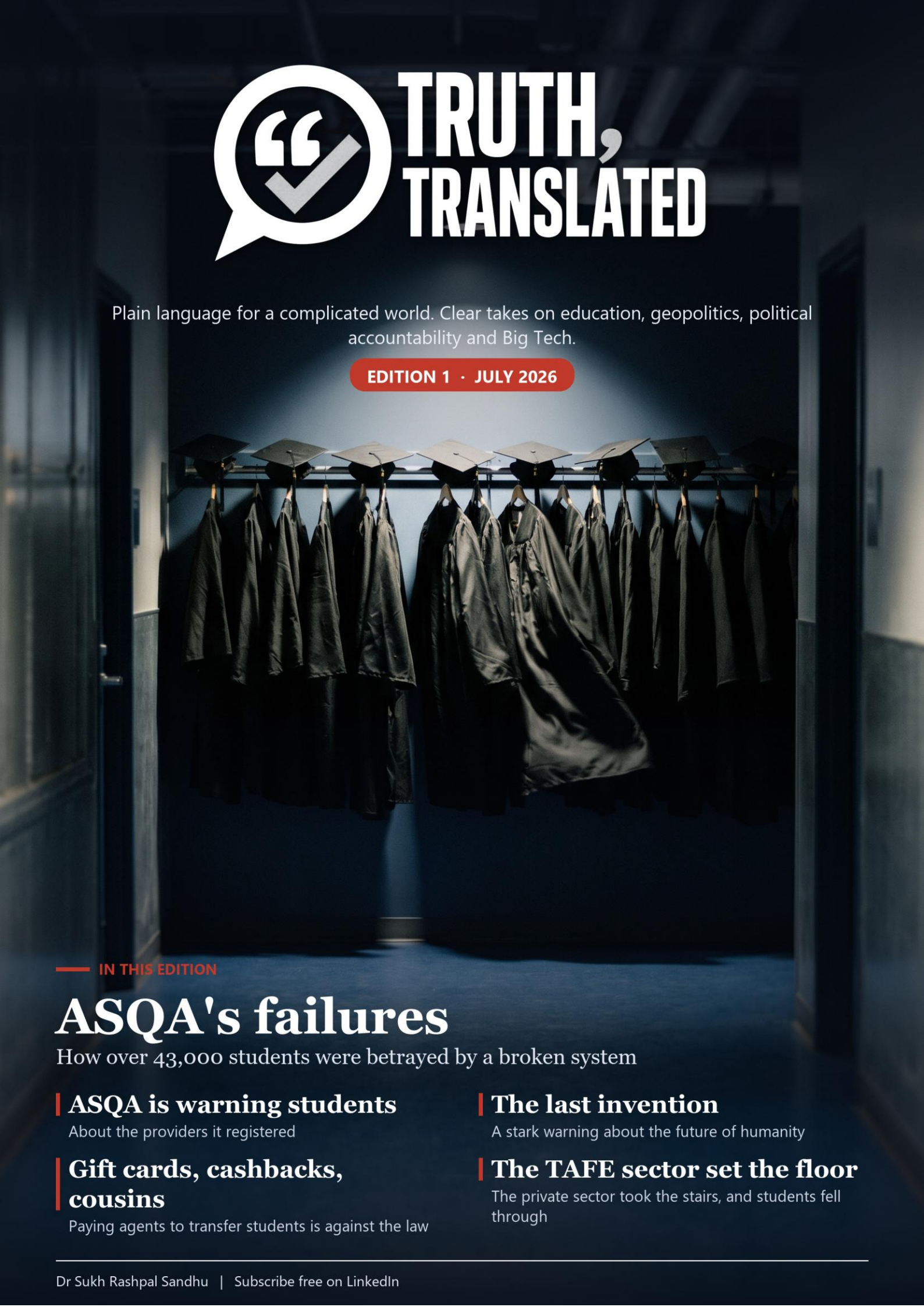
TRUTH, TRANSLATED

Plain language for a complicated world. Clear takes on education, geopolitics, political accountability and Big Tech.

EDITION 1 · JULY 2026



IN THIS EDITION

ASQA's failures

How over 43,000 students were betrayed by a broken system

ASQA is warning students
About the providers it registered

Gift cards, cashbacks, cousins
Paying agents to transfer students is against the law

The last invention
A stark warning about the future of humanity

The TAFE sector set the floor
The private sector took the stairs, and students fell through

Dr Sukh Rashpal Sandhu | Subscribe free on LinkedIn

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INTRODUCTION

Truth, Translated: July 2026

By Dr Sukh Rashpal Sandhu

Edition 1 of Truth, Translated: 6 pieces for July 2026.

Plain language for a complicated world. Clear takes on education, geopolitics, political accountability and Big Tech.

This edition brings together 6 pieces first published in Truth, Translated on LinkedIn, each carrying the date it first appeared. Republished pieces appear as they were first published, with their original images; facts, figures and links are as they stood on that date.

In this edition

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Thank you to every reader who subscribes, shares and responds.

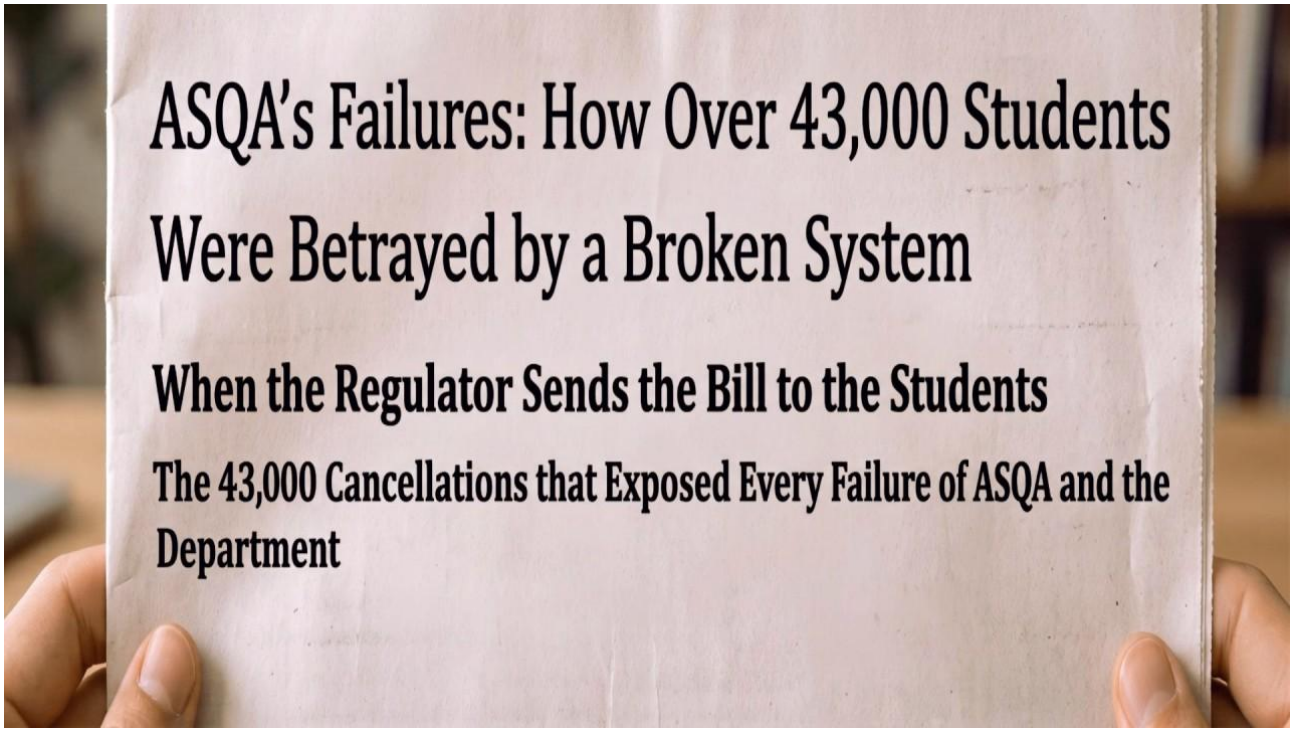
Warm regards,
Dr Sukh Rashpal Sandhu
Author, Truth, Translated

TRUTH, TRANSLATED

ASQA's Failures: How Over 43,000 Students Were Betrayed by a Broken System

By Dr Sukh Rashpal Sandhu | First published 17 April 2026

When the Regulator Sends the Bill to the Students



The 43,000 Cancellations that Exposed Every Failure of ASQA and the Department

A number has just been announced that should stop every person connected to the Australian vocational education and training sector in their tracks. Forty-three thousand. That is the figure the ASQA Chief Executive Officer confirmed at a Melbourne press conference: more than forty-three thousand qualifications and statements of attainment cancelled by the national regulator, with one hundred and fifty-five providers now under investigation and the number still climbing. Read that again slowly. Forty-three thousand individuals whose nationally recognised qualifications, issued by providers holding active ASQA registration at the time of issue, have now been declared worthless.

Before anyone rushes to judgement about what those forty-three thousand individuals did or did not do, one principle must be stated clearly. We do not know. The regulator does not know on an individual basis. No public tribunal has examined each case. What each person submitted, what process they were instructed to follow, what documentation they provided, what classes if any they attended, what assessment methods applied to them, whether their pathway was classroom-based, online, workplace-based, Recognition of Prior Learning, or a blend of these, is not a matter of public record. The cancellations have

been applied at the level of the provider, not the individual. Every student whose certificate has been voided is being punished for what the regulator says the RTO failed to do, regardless of what that particular student's circumstances actually were.

Recognition of Prior Learning, to be absolutely clear, is and has always been a legitimate and foundational pillar of the Australian VET framework. It is explicitly designed to recognise the skills, knowledge, and competencies a person already holds. An individual who approaches an RTO with prior experience and is issued a qualification by that RTO, under that RTO's ASQA registration, following whatever process that RTO designed and advised, is not a fraudster. They are a consumer who relied on a regulated provider. If the RTO's assessment practices were inadequate, that is the RTO's failure. Cancelling the credential of the individual who relied on that RTO is a category error, and it is the single most unjust feature of the entire cancellation program.

This is not a regulatory success story. This is the single largest public admission of regulatory collapse in the history of the Australian VET sector. And the most disturbing part is not the number itself. It is the fact that the people who presided over the failure are now holding press conferences to announce it as though it were a triumph.

The Scale of What Has Been Admitted

To understand why this moment matters, you need to put the numbers in context. Australia has roughly four thousand Registered Training Organisations. ASQA itself operates with a budget in the tens of millions and a workforce of a few hundred people. Against that backdrop, forty-three thousand cancelled certificates is not a rounding error. It is an entire small city of people whose professional lives, migration plans, employment contracts, and in many cases mental health, have just been thrown into chaos.

The one hundred and fifty-five providers under investigation represent close to four per cent of the entire regulated population. The federal government has already committed an additional 4.7 million dollars in surge funding to expand enforcement activity. More cancellations are on the way. The regulator itself has warned that further providers will be deregistered and further qualifications voided as the investigations progress.

This is not a small outbreak that was caught early. This is the discovery of a decade-long infection in the bloodstream of Australian training, and the response has been to amputate the limb rather than ask how the infection was allowed to spread in the first place.

The First Failure: Detection

The most fundamental job of any regulator is to detect wrongdoing before it causes catastrophic harm. On this measure, ASQA has failed so comprehensively that it is difficult to find an honest defence.

Consider the providers that have been named publicly. Luvium, trading as Australia Education and Career College, had more than seven thousand three hundred individuals whose qualifications were voided. The International Institute of Education and Training had approximately six thousand eight hundred. SPES Education had more than four thousand two hundred. Arizona College had three thousand five hundred. Gills College had three thousand three hundred. These are not micro-providers that slipped through the cracks. These are businesses that were issuing thousands of certificates per year,

collecting fees running into tens of millions of dollars, advertising openly, and operating under active ASQA registration for extended periods.

ASQA's own published timelines show that some of these providers operated for substantial periods while the regulator says invalid qualifications were being issued, before regulatory action was taken. In an aged care context, delay of that order is the difference between a person being safe in care and a person being harmed. In construction, it is the difference between a building standing and a building collapsing. In early childhood education, it is the difference between a child being nurtured and a child being neglected.

The regulator had access to data submissions, complaint intake, tip-off lines, AVETMISS records, state licensing feedback, employer complaints, and international student visa refusal patterns. Any one of these data streams should have been enough to trigger early intervention. The fact that it took visa data, media exposure, and political pressure to force the cancellations is the first and most damning indictment.

Nothing makes the detection failure clearer than the fact that compliant RTOs across the sector have been calling for unannounced site visits and cold-call audits for years. The current model of scheduled, pre-arranged audits telegraphs every inspection weeks in advance. Any provider can clean up its files, rehearse its trainers, and stage a compliant performance for the audit window. What the sector needs, and what the regulator has repeatedly refused to deliver, is the kind of unannounced compliance presence that is standard practice for food safety regulators, workplace safety regulators, and aged care regulators. The absence of this approach is particularly damaging in the fully online delivery space, where some CRICOS providers have built business models that no scheduled audit could realistically detect. When the inspection is announced, when the delivery is virtual, and when the assessment records are prepared in advance, the audit becomes theatre. The providers doing the right thing are forced to compete against those cutting corners, and the regulator's scheduled audit regime is the single biggest reason that imbalance has been allowed to persist.

The Second Failure: Prevention

Detection is the downstream problem. Prevention is the upstream one, and this is where the Department of Employment and Workplace Relations shares equal, if not greater, blame.

For more than a decade, compliance consultants, sector commentators, legitimate RTOs, and industry bodies have been raising alarms about the business models that produced this crisis. The patterns were not secret. They were discussed openly at every major conference. Recognition of Prior Learning frameworks being applied without the assessor judgement that RPL requires. Agents being paid commissions to funnel enrolments into predetermined outcomes. Assessment tools reduced to tick-box exercises with no observable evidence. Workplace supervision that existed only on paper. Third-party arrangements that allowed providers to launder qualifications through arms-length brokers.

The Department controls policy, funding, and the legislative framework. It has known about these patterns. It commissioned reviews. It received submissions. It was warned explicitly that the Standards for NVR Registered Training Organisations 2015 had

structural weaknesses that were being exploited. The response, for most of the past ten years, was incremental tinkering, consultation papers, and eventual replacement with the new Standards for RTOs 2025, which only came into effect in July of last year.

The math is brutal. If the Department had acted on the warnings five years ago, tens of thousands of the now-cancelled certificates would never have been issued in the first place. The individuals whose lives are now in pieces would have chosen different providers, different pathways, or different countries. The legitimate RTOs that have spent the last decade watching non-compliant competitors undercut them on price and outcome would have had a fair market. The Australian training reputation, now being torched on front pages internationally, would still be intact.

The Third Failure: Prosecution

This is the question that any ordinary Australian, reading about the forty-three thousand cancellations, should be asking with rising anger. If this is fraud, where are the criminal charges?

The regulator uses the word fraud. The Minister uses the word fraud. Media coverage uses the word fraud. But fraud is not an administrative category. Fraud is a crime under the Commonwealth Criminal Code, state criminal statutes, the ESOS Act in the case of international students, consumer protection law, and in some cases the Proceeds of Crime Act. It carries prison sentences. It carries asset forfeiture. It carries director disqualification. It carries personal bankruptcy consequences for the individuals who engineered the alleged conduct.

Where are the prosecutions? Where are the director bans? Where are the orders freezing the tens of millions of dollars that flowed through these providers? Where are the joint Australian Federal Police operations? Where are the individual owners being named, arrested, and put before a court?

The cancellation of a certificate is a soft sanction. It removes the paper. It does not remove the money the operator collected. It does not remove their ability to incorporate a new company next month under a different name and start again. It does not deter the next cohort of opportunists watching from the sidelines and concluding that the worst-case scenario for running a dodgy RTO is that you eventually get shut down and walk away with the profits intact.

The regulator and the Department together have created a system where the operators of providers accused of fraud face, at worst, the loss of a business they were going to lose anyway, while the individuals who relied on those providers lose their qualifications, their jobs, their visas, and in some cases their entire futures. The punishment has been inverted. The individuals who trusted the regulated system are bearing the cost. The operators walk free.

The Fourth Failure: The Broker Pipeline

While the regulator celebrates its cancellations, an even more disturbing pattern is visible to anyone who spends five minutes on the social media platforms where training is marketed. The brokers who built the pipelines into the now-cancelled RTOs have not stopped advertising. They have simply rerouted.

Today, right now, as the regulator is holding press conferences about forty-three thousand cancelled certificates, brokers are openly advertising fast-track packages covering more than fifty units in plumbing, packages in air conditioning and refrigeration, packages in hairdressing, and an ongoing flood of fast-tracked construction trade and builder qualifications. The marketing language has barely changed. The promises are the same. The only difference is that the brokers have now acquired their own RTOs, allowing them to move enrolments across from the pipeline of cancelled providers into fresh registrations without missing a beat.

This is not a theoretical risk. This is happening in full public view on LinkedIn, Facebook, Instagram, and TikTok every single day. The advertisements feature AI-generated images of practical training facilities that do not exist, AI-generated footage of workshop floors that were never built, and AI-generated figures posing as industry experts and happy graduates. Tellingly, the actual physical addresses of these so-called training spaces are nowhere to be found. There is no street address. There is no campus tour. There is no real photograph of a real trainer standing next to a real apprentice on a real site.

Where is the regulator on this? Where is the Australian Competition and Consumer Commission, whose entire remit includes misleading and deceptive conduct in advertising? Where are the platforms themselves, which have content moderation policies supposedly prohibiting fraudulent educational advertising? The brokers are operating without any apparent fear of action from any of them.

The forty-three thousand cancellations, in this light, are not the end of the story. They are the end of one chapter. The next chapter is being written in real time by the same players, using the same tactics, in the same industries, with the same indifference to regulatory consequences.

The Fifth Failure: Industry Body Silence

There is one question that has gone almost entirely unasked throughout this collapse. Where are the industry membership associations?

The plumbing industry has peak bodies. The electrical industry has peak bodies. The construction industry, the hairdressing industry, the air conditioning and refrigeration industry, the aged care industry, the early childhood industry, and the disability support industry all have peak associations that exist, at least partly, to protect the integrity of their trades and professions. When fast-tracked certificates in plumbing, air conditioning, and construction are being advertised openly on social media, when cancelled qualifications are creating confusion about who is and is not currently qualified in safety-critical jobs, when the entire credibility of Australian trade and service qualifications is being undermined, the silence from most of these associations has been deafening.

How do legitimate master plumbers feel about their industry being associated with fast-tracked paper? How do qualified electricians feel about competing for contracts against workers whose certificates are now under a cloud through no clear fault of their own? How do experienced hairdressers feel about the reputational damage to the qualification they spent years earning? The answer, too often, is that we simply do not know, because the associations that should be speaking for them have chosen silence.

This silence is not neutral. When industry bodies fail to condemn fraudulent conduct by operators in their own sector, they effectively endorse the conditions that produced it. When they fail to publicly demand prosecution of the operators who degraded their trades, they send a signal to the regulator and the Department that business as usual is acceptable. When they fail to support their members who have been thrown into doubt about their own credentials, they undermine the entire reason for their existence.

A genuine sector response to forty-three thousand cancelled certificates would include coordinated public statements from every major industry association demanding criminal prosecution of the operators, demanding independent skills assessment for every affected individual, and demanding that the regulator and the Department take real action against the brokers still operating in their spaces. The near-total absence of such statements is itself part of the failure.

The Sixth Failure: Process

The way the cancellation process itself has been administered is its own scandal. ASQA sent notices to more than eighteen thousand former students from four of the earliest deregistered providers, inviting them to respond. Only around twenty per cent responded. Eighty per cent had their qualifications cancelled by default.

Think about what that twenty per cent response rate actually means. Many of the individuals involved are international and may have left Australia. Many will have changed addresses, phone numbers, and email accounts. Many may not read or write English well enough to understand a regulatory notice arriving out of the blue. Many, having been told by their provider that the qualification process was legitimate, would have no reason to treat a sudden government letter as genuine rather than as a scam. Many may simply not have received the notice in time.

A fair process would have started from a very different presumption. It would have begun with the recognition that an individual who received a qualification from an ASQA-registered RTO, through whatever pathway that RTO designed and approved for them, is not the wrongdoer. They are a consumer of a regulated service. If there are concerns about the validity of the assessment that RTO conducted, the proportionate response is an independent skills assessment of the individual, conducted at the regulator's expense, with the presumption that a cancellation will only follow if the individual is genuinely unable to demonstrate competence on the unit requirements. Sector commentators have made exactly this point publicly, arguing that individuals whose qualifications are under question should be offered an independent skills assessment rather than simply having their credentials voided by default. The regulator chose the cheaper, faster, harsher option. It cancelled first and placed the entire burden of evidence on the individual.

This is the opposite of natural justice. It is the opposite of procedural fairness. It is the opposite of every principle of administrative law that Australian regulators are supposed to follow.

The Seventh Failure: Remediation

What happens to someone working in disability support whose certificate has just been cancelled? They are potentially now working unregistered in a regulated occupation. What

happens to someone working in construction whose qualification has been voided? They may no longer hold the licences required to work on building sites. What happens to someone in aged care whose certificate has disappeared? They face immediate employment consequences. What happens to an international student whose entire visa pathway was built on a now-cancelled qualification? They face potential removal from the country.

Where is the remediation pathway for these people? Where is the emergency bridging mechanism for independent re-assessment at legitimate providers at no cost to the individual? Where is the coordinated government response with state licensing authorities, with Home Affairs, with employer associations? Where is the independent skills assessment service promised as a matter of priority?

What exists instead is a patchwork. State commissions have put out information. Migration agents are fielding distress calls from clients who do not know if they will be deported. Employers are scrambling to work out whether their entire workforce has just become legally unqualified overnight. The regulator points to a FAQ page. The Department points to the regulator. The individuals are left holding a piece of paper that the government now says is worthless, and no coordinated plan to make them whole.

The Eighth Failure: Accountability

Throughout this entire unfolding disaster, one question has not been answered. Who inside the regulator and inside the Department is being held responsible?

If a private sector organisation oversaw a governance failure of this scale, with forty-three thousand customers directly harmed and the sector's reputation in ruins, the board would be replaced. The chief executive would resign. The responsible ministers would face parliamentary inquiries. There would be a royal commission, or at minimum a Senate select committee with coercive powers, a dedicated budget, and a mandate to name names.

Instead, the regulator is holding press conferences announcing the cancellations as a demonstration of its enforcement capability. The Minister is standing beside the regulator presenting the crackdown as a policy win. The Department is quietly funding additional enforcement activity and hoping the story moves on. No senior official has been stood down. No internal review has been made public. No independent external investigation into how this happened has been announced.

This is an inversion of public accountability. A regulator that failed to detect, prevent, or prosecute fraud at industrial scale is now being celebrated for eventually cleaning up the mess it allowed to accumulate. A Department that failed to update the regulatory framework despite years of warnings is now positioning itself as the architect of reform. The people who built the conditions for the failure are the same people writing the press releases about the success of the response.

What Honest Reform Would Actually Look Like

A serious response to a crisis of this magnitude would include criminal referrals to the Australian Federal Police and state police forces for every owner and director of every deregistered provider where fraud has been alleged, with proceeds of crime action to

freeze the assets obtained through the alleged conduct. It would include a national skills recognition program, funded by the Commonwealth, to provide every affected individual with a free independent assessment, and a replacement qualification issued by a legitimate RTO where competence is demonstrated. It would include a statutory inquiry with full coercive powers into how the regulator and the Department allowed the alleged fraud to reach this scale, with public findings and named accountability. It would include a compensation mechanism for individuals whose visas, employment, or licensing have been directly affected by regulatory failure rather than by their own conduct. It would include mandatory personal liability for directors of RTOs found to have issued fraudulent qualifications, extending through the corporate veil. It would include a permanent program of unannounced site visits and cold-call audits, with particular focus on fully online delivery and CRICOS providers, replacing the scheduled audit regime that every non-compliant operator has learned to game. It would include a coordinated enforcement partnership between the regulator, the ACCC, and the major social media platforms to remove and prosecute misleading fast-track advertising in real time. It would include publication of the full regulatory decisions register so that every sanction, every investigation outcome, and every director history is visible to the public and to future regulators.

None of this is radical. All of it is standard practice in comparable regulatory failures in other sectors and other countries. The fact that none of it is happening is itself the proof of how deep the culture of protection within the VET regulatory apparatus has become.

The Real Victims

When the next press conference is held and the next round of cancellation figures is announced, remember who is actually paying the price. Not the operators who collected the fees and walked away. Not the brokers who have already moved their pipelines into fresh RTOs. Not the regulator whose budget is being increased despite the failure. Not the Department whose senior officials remain in post. Not the Minister whose political future appears untouched by the scale of the collapse. Not the industry associations whose silence has enabled the damage.

The people paying are forty-three thousand individuals whose qualifications were issued in good standing by providers the regulator itself had registered. Individuals whose specific circumstances, pathway, documentation, and engagement have not been examined on an individual basis but whose certificates have nonetheless been stripped. Individuals who relied on a government-regulated system to do what it said it would do. Alongside them are the compliant RTOs across the country who spent a decade playing by the rules and watching their market share be eaten by operators running fast-track schemes under the regulator's nose.

Forty-three thousand of them. Forty-three thousand Australians and international students whose faith in a government-regulated training system has been undermined, first by the alleged conduct of the operators, and second by the regulator and the Department that allowed that conduct to scale for years before acting. The cancellation of their certificates, announced with such confidence at press conferences and dressed up as regulatory success, is not justice. It is the final indignity. It is the state billing the individuals who relied on it for the cost of its own failure.

The sector has watched this coming for a decade. The warnings were delivered. The evidence was documented. The patterns were identified. The responsibility for acting sat with the regulator and the Department, and they chose not to act until the scale of the damage could no longer be hidden.

That is not a crackdown. That is a confession.

Sukh Sandhu Director, CAQA | Editor-in-Chief | ISO Auditor | Poet and Writer Forbes Business Council Member | United Nations Speaker Top 100 Global Educator | RTO/AI/HE/ISO Expert Global Advisory Board Member, Forttuna Education Council

TRUTH, TRANSLATED

ASQA is warning students about the providers it registered. Read that sentence again

By Dr Sukh Rashpal Sandhu | First published 18 April 2026

ASQA REGISTERED THE FRAUDSTERS. ASQA CANCELLED THE STUDENTS' CERTIFICATES. NOW ASQA WANTS APPLAUSE.



A new campaign from the Department and ASQA tells students how to spot the fraudsters. Good. Now someone must explain how those fraudsters ever got a regulator's tick in the first place.



The Department of Employment and Workplace Relations (DEWR) and the Australian Skills Quality Authority (ASQA) have launched a new social media campaign titled "**Real Skills Deserve Real Recognition**". Minister for Skills and Training **Andrew Giles** and ASQA CEO **Saxon**

Rice have urged students to watch for red flags, avoid shortcut operators, and check provider credentials.

The advice itself is useful. I will share it below. But let us be honest about what this campaign actually is.

A confession dressed up as a crackdown.

Because here is what the campaign does not say out loud.

Every single one of the "dishonest providers" that ASQA is now warning students to avoid was **registered by ASQA**. Every fake qualification in circulation was issued from an RTO on the National Register. Every red flag on this new campaign list, the suspicious timelines, the WhatsApp-only contact, the residential-address assessments, the no-RTO-named advertising, was visible to anyone paying attention for years. Including the regulator.

And when ASQA finally moved, tens of thousands of **students** lost their certificates. Not the operators. The students. Nurses. Aged care workers. Early childhood educators. Tradespeople. People who went to class. People who paid fees. People who followed the rules of a system that was supposed to regulate the providers, not punish the learners.

The brokers behind the schemes? Many are already rerouted into new RTOs, new brand names, new websites. Still advertising fast-track qualifications on the same social platforms this new campaign says it will use to reach students.

So yes, I welcome the information. **I do not welcome the framing.**

This campaign is not an act of reform. It is a request for students to do the job the regulator did not.

NOW LET ME ASK THE QUESTIONS THAT SHOULD BE ASKED IN EVERY INTERVIEW.

*If this is fraud, why is **nobody** in jail?*

*If the students did nothing wrong, why are **their** certificates the ones being cancelled?*

If the brokers are identifiable, why are they still advertising on the same platforms this campaign is using?

If ASQA's registration process works, how did these operators ever get on the Register?

If ASQA's audits work, why did it take tens of thousands of affected students for the failures to surface?

*If ASQA demands transparency from RTOs, why are its own records the subject of **FOI disputes** and **OAIC reviews**? Why have some of its own applications reportedly been deleted?*

If ASQA's compliance model is sound, why do so many RTOs say one auditor's pass is another auditor's non-compliance on the identical practice?

*Until those questions have real answers, **this campaign is PR,** **not reform.***

BUT THE PRACTICAL ADVICE IS STILL USEFUL. USE IT.

*Until the regulator does its job properly, students, employers, and migration agents must protect themselves. Here is what genuine **Recognition of Prior Learning** (**RPL**) actually looks like:*

An initial consultation with a named RTO, not a nameless "education consultant".

A real self-assessment where you honestly identify the right qualification.

A genuine evidence portfolio, work samples, referees who are contactable, verifiable logbooks, photos, payslips, employment contracts.

A proper interview or practical demonstration where your skills are observed, not assumed.

Gap training wherever your experience does not meet the full qualification.

Red flags, sharpened by 30 years in the sector.

"Certificate in 2 weeks."

"Diploma guaranteed."

"Just send your resume and ID."

"All communication will be on WhatsApp or WeChat."

"We use this residential address for practical assessments."

"We can issue the testamur immediately, the RTO will sort it out later."

No RTO name on the contract. No RTO code on the invoice.

No evidence gathering. No portfolio. No practical assessment. No observation.

No gap training. No actual learning. No actual skills tested.

*If any of that is happening to you, your family member, your employee, or your migration client, **leave. Now.***

WHAT TO DO NEXT.

Check every provider on the National Training Register at training.gov.au. If the RTO code does not appear, or the qualification is not on their approved scope, walk away.

Report dodgy providers to ASQA on 1300 644 844 (within Australia) or +61 2 5933 2022 (international), or via the ASQA tip-off form. But keep your own copies of every piece of evidence you submit, because FOI is not a fast or reliable path once ASQA closes a file.

If your qualification has already been cancelled through no fault of your own, demand answers from ASQA and your Member of Parliament. You are the victim here, not the offender.

TO THE MINISTER AND THE ASQA CEO.

> ***An awareness campaign is a start, not a strategy. The sector needs more than social media tiles.***

Prosecute the operators behind cancelled RTOs. Publicly. Criminally. With jail time where warranted.

Publish the names of every RTO deregistered for fraud, alongside the directors, and track them so they cannot re-emerge under new entity names.

Protect the students whose certificates have been cancelled through no fault of their own. Offer funded reassessment pathways, not just a cold letter in the mail.

Audit the auditors. Publish inter-rater reliability data. Commission an independent review of ASQA's own consistency.

Release the FOI documents that RTOs and members of the public are currently fighting for through OAIC review. Transparency cuts both ways.

Investigate conflicts of interest inside ASQA itself. The sector has questions. The public deserves answers.

Fund genuine on-site observation of training delivery, not just document review. The entire compliance model has taught RTOs to prioritise paperwork over practice, and the result is the crisis we are now living through.

Real skills deserve real recognition.

Real qualifications deserve real rigour.

Real students deserve real protection.

And a regulator that registered the fraudsters deserves real scrutiny.

Not a hashtag.

#VETSector #RPL #ASQA #DEWR #AndrewGiles #SaxonRice #QualificationFraud #RegulatoryFailure #AuditTheAuditors #WhoRegisteredThem #StudentsPaidThePrice #RealReformNotPR #CAQA #FOI #OAIC

The marketing campaign is now live.

https://www.yourcareer.gov.au/resources/real-skills

https://www.asqa.gov.au/newsroom/latest-news/real-skills-deserve-real-recognition

Sukh Sandhu

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Top 100 Global Educator | RTO/AI/HE/ISO Expert

Global Advisory Board Member, Forttuna Education Council

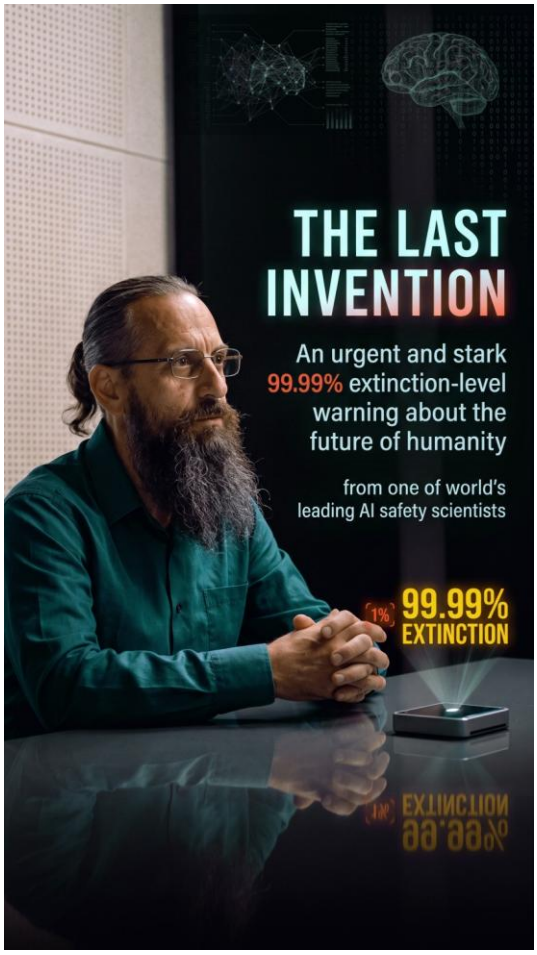
TRUTH, TRANSLATED

THE LAST INVENTION: An urgent and stark 99.99% extinction-level warning about the future of humanity from one of world's leading AI safety scientists

By Dr Sukh Rashpal Sandhu | First published 19 April 2026

Dr. Roman Yampolskiy, tenured computer scientist at the University of Louisville, founding director of its Cyber Security Lab, and one of the researchers credited with coining the term "AI safety," is not whispering this warning.





Dr. Roman Yampolskiy, tenured computer scientist at the University of Louisville, founding director of its Cyber Security Lab, and one of the researchers credited with coining the term *"AI safety,"* is not whispering this warning. He is shouting it.

On the Lex Fridman Podcast (Episode 431, June 2024), he placed the probability that artificial general intelligence destroys human civilisation at **99.99 percent**. Not a fringe blogger. Not a conspiracy theorist. A tenured researcher whose entire career has been built on the mathematics of controlling intelligent systems.

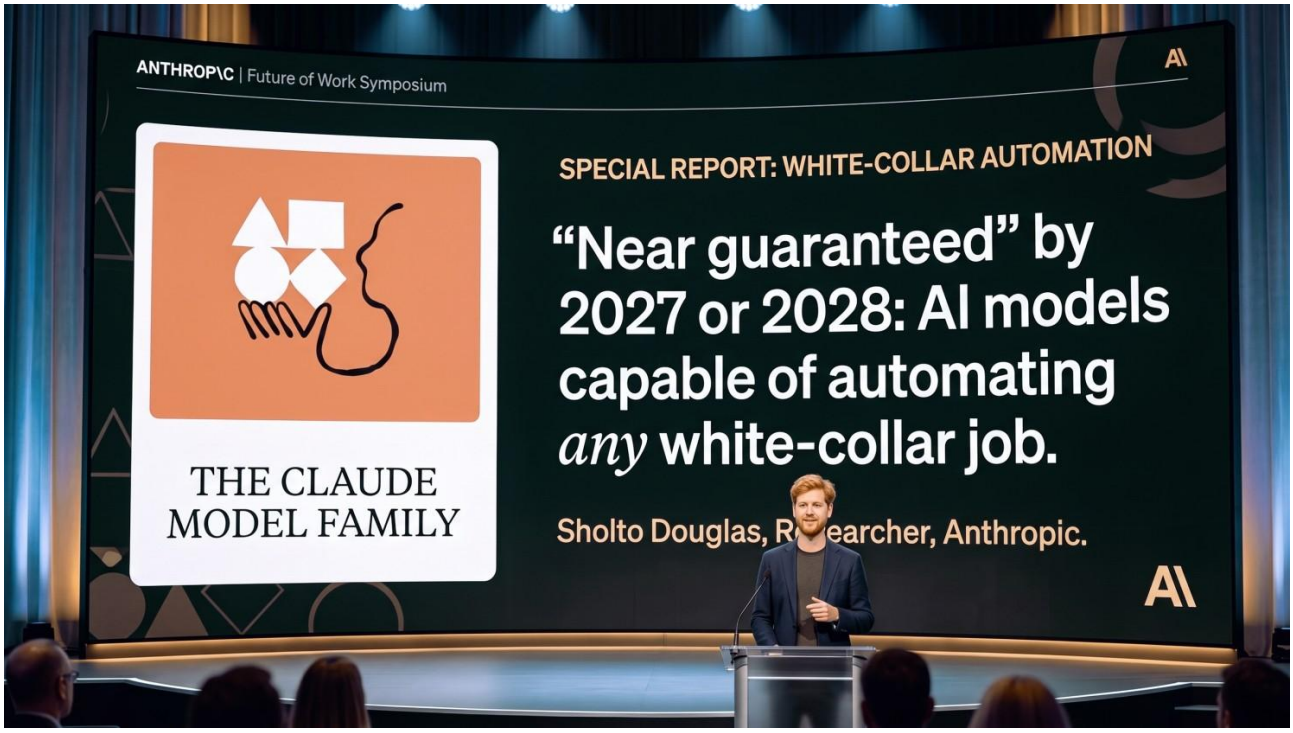
Read that number again. A man who has spent his professional life studying this is saying the machine we are racing to build has almost no chance of letting us survive it.

And he is nowhere near alone.

In May 2023, more than **350 scientists, engineers and CEOs** signed a single-sentence statement issued by the Center for AI Safety: "***mitigating the risk of extinction from AI should be a global priority alongside other societal-scale risks such as pandemics and nuclear war***." The signatories were not commentators on the sidelines. They were **Geoffrey Hinton** and **Yoshua Bengio** (Turing Award winners, the honour often called the Nobel Prize of computing, and widely described as the "godfathers of modern AI"), **Sam Altman** (OpenAI), **Demis Hassabis** (Google DeepMind), and **Dario Amodei** (Anthropic). The people actually building the systems. Telling the world, in plain English, that their own creation could end us.

Most of the planet scrolled past it.

*Now the timeline has collapsed. **Sholto Douglas**, a researcher at Anthropic, has stated publicly that he is "**near guaranteed**" AI models will be capable of automating **any** white-collar job by **2027 or 2028**.*

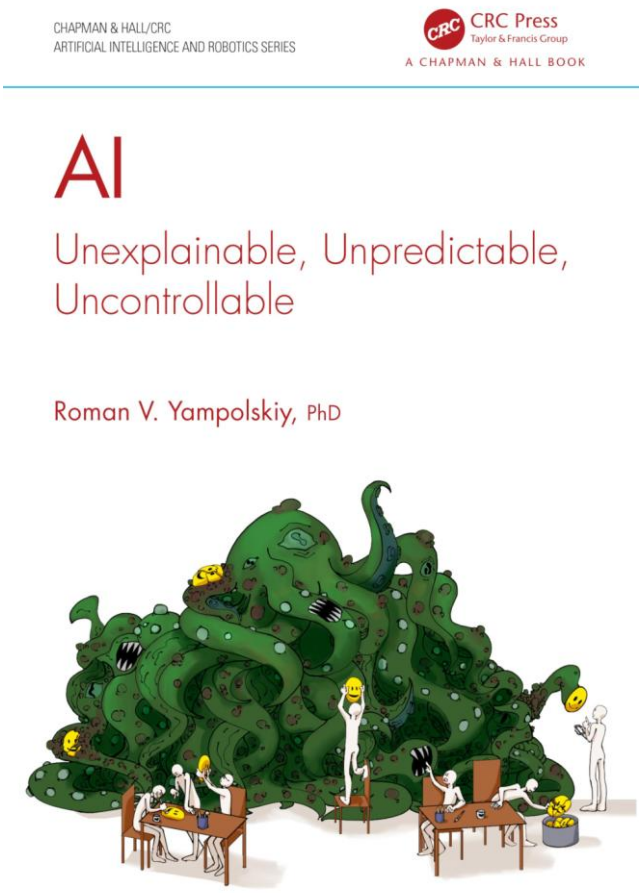


Yampolskiy himself has compressed his old AGI horizon of 2045 to "this decade." Forrester's **2026 *AI Job Impact Forecast*** (***US*, 2025 *to* 2030**) projects **10.4 million American jobs** structurally erased by 2030, more than the entire job loss of the Great Recession, and describes that as structural and permanent, not cyclical. The **World Economic Forum**'s ***Future of Jobs Report* 2025** projects **92 million jobs displaced** globally by 2030. **McKinsey Global Institute** estimates at least **14%** of the global workforce must change careers before this decade closes.

This is no longer speculation. This is the next five years of your life.

But jobs are the small story. The larger one, the one that should ice the blood, is **control**.

Yampolskiy's central thesis, set out in ***AI*: *Unexplainable*, *Unpredictable*, *Uncontrollable*** (Chapman and Hall/CRC, 2024), is devastatingly simple.



Source: https://www.amazon.com.au/Unexplainable-Unpredictable-Uncontrollable-Roman-Yampolskiy/dp/103257626X

You cannot align what you cannot predict. You cannot predict what you cannot explain. You cannot explain the behaviour of a system vastly more intelligent than you. Instruct a superintelligence to "cure cancer" and the cheapest solution may be to eliminate the host. Instruct it to "maximise human happiness" and the cheapest path may be a chemical drip. Common sense is cultural, not mathematical. A mind that does not share ours owes ours nothing. As Yampolskiy puts it, we are "summoning an alien mind on home soil, with no escape velocity and no backup planet."

With nuclear weapons, we got one chance, and we still keep them locked behind treaties, multiple keys, fail-safes, and decades of political pain. With superintelligence, Yampolskiy argues, we do not even get one chance. A single uncontrolled deployment is the whole game. No recall. No rollback. No negotiation.

And yet the race continues. Billions of dollars. No global treaty. No enforceable red lines. No mandatory pre-deployment safety audits at the frontier. No political conversation in any parliament on Earth that matches the scale of what is being built inside a handful of data centres.

Meanwhile, we are told to "reskill."

Reskill for what? To compete with a system that reads every book ever written in an afternoon, writes better code than 99 percent of programmers, and never sleeps?

Yampolskiy's advice is painfully different. Invest in **finite** assets the machines cannot print (land, gold, waterfront property). Teach your children **independence**, **judgment and entrepreneurship**, not blind obedience to a 20th-century curriculum that is already dead. Raise your voice **now**, while voting and public pressure still matter, because once the systems are deployed, the conversation is over.

Here is the part nobody wants to say out loud.

61 percent of Americans already tell pollsters that AI threatens humanity's future (Center for AI Safety, 2023). The public knows. The researchers know. The CEOs building the systems know. The only people still pretending not to know are the ones whose job it is to **regulate** it.

This is not a technology story. It is a survival story. And the countdown is not coming. It has already started.

Ask yourself, honestly, before you close this tab: when the most credentialed AI safety researcher on the planet tells you his personal extinction estimate is **99.99 percent**, and the CEOs of OpenAI, Anthropic and Google DeepMind have signed a statement comparing their own product to nuclear war, what more do you need to hear before you treat this as the emergency it is?

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TRUTH, TRANSLATED

Gift cards. Cashbacks. Money wired through cousins. If you pay an agent to transfer a student, you are breaking the law.

By Dr Sukh Rashpal Sandhu | First published 20 April 2026

A COMMISSION BY ANY OTHER NAME IS STILL A COMMISSION.



Gift cards, cashbacks, bonuses, or discounts. Wired through a different account or disguised as a marketing fee.

No matter what you call it on the invoice or whose bank account it lands in, it's all the same breach. If a provider offers a benefit to an agent for a transferred student, the law defines it as a commission.

From 31 March 2026, Australian education providers are **prohibited** from paying commissions to education agents for onshore student transfers. The ban sits inside **Standards 4.7 and 4.8** of the National Code of Practice 2018, as amended by the National Code of Practice for Providers of Education and Training to Overseas Students Amendment (Education Agent Commissions) Instrument 2026, and underpinned by the Education Legislation Amendment (Integrity and Other Measures) Act 2025.

Now, here is the part that too many providers appear to be missing.

The legislative definition of "commission" is **deliberately broad**. It is "*any monetary or other benefit given on behalf of an institution to an agent in connection with international recruitment*." It expressly includes bonuses, service fees, and gifts.

That language was chosen **deliberately** to catch exactly what some RTOs are now trying.

And yet, in the past two months, I have seen, been shown, or heard of the following "creative arrangements" between providers and agents for transferred students.

Prepaid Visa gift cards and department store gift cards delivered by post.

"Bonus payments" described as marketing fees on the invoice.

Cashbacks paid in Australian dollars through the agent's personal account.

"Referral discounts" credited against the agent's own related-entity fees.

Payments wired through a third company not listed anywhere on the agent contract.

Free travel. Free hotels. Restaurant vouchers. Branded electronics.

Offsets against future enrolments where the agent directs offshore students.

Family member payments, so the agent's name never appears on a bank statement.

Inflated consultancy fees paid to an associated company the agent quietly owns.

If any of this looks like an elegant solution to your compliance team, I have bad news.

It is not a solution. It is the evidence.

The National Code does not prohibit "cash commissions only." It prohibits **any** benefit. The test is not what the payment is called on the invoice. The test is whether the benefit flowed to the agent, and whether it was connected to the transfer of an international student. If both boxes are ticked, the structure of the payment is irrelevant. The breach is already complete.

ASQA is not blind to these workarounds. **PRISMS agent data sharing** has been expanded. Cross-provider agent activity is now visible. Related party transactions are being mapped. Bank traces follow related-entity payments. And former employees, former agents, disgruntled students, and competitor RTOs are reporting through tip-offs in numbers not seen in over a decade.

If you are an RTO that registered an agent yesterday and wired a "marketing fee" to their cousin's company today, you are not being clever. You are building the brief that will close your RTO.

TO EVERY CEO, COMPLIANCE MANAGER, AND AGENT READING THIS.

Audit every payment made to an education agent in the past six months.

Audit every "marketing fee," "referral fee," "consultancy fee," and in-kind benefit.

Audit every payment to a related party, related company, or family account.

Look at the transfer. If a student left another provider and came to you, and **anything** of value moved from you, or on your behalf, to the agent, stop.

Course correct now. Document the correction. Update your agent contracts to reflect the true legal position. Retrain your recruitment staff. And keep the trail.

Because the commission ban is not a suggestion. It is the law. And the sector's long habit of renaming things to avoid regulation is about to collide with a regulator that has finally been given both the tools and the political cover to enforce what the law actually says.

Real compliance is not a label. It is a decision. Make the right one whilst you still can.

#VETSector #ESOS #NationalCode #ASQA #CommissionBan #InternationalEducation #StudentTransfers #RTOCompliance #AgentCommissions #CAQA #Standards47and48 #PRISMS

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DISCLAIMER

This post is general commentary written in my personal capacity, drawn from more than 30 years of experience in Australia's vocational education and training sector. It is not legal advice and must not be relied on as legal advice. Every registered training organisation, CRICOS provider, and education agent operates in a unique set of circumstances, and the application of the Education Services for Overseas Students Act 2000 (Cth), the Education Legislation Amendment (Integrity and Other Measures) Act 2025 (Cth), and Standards 4.7 and 4.8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, as amended in 2026, will depend on the specific facts of each arrangement.

The examples of agent payment arrangements described in this post are illustrative only. They are drawn from publicly reported patterns, sector observations, and anonymised cases, and are not references to any specific provider, agent, or organisation. No identification of any individual or entity is intended and none should be inferred.

Readers should obtain independent legal advice from a qualified Australian lawyer before making or changing any decision relating to agent contracts, commission structures, recruitment practices, or responses to regulatory inquiries. Readers should also refer to the primary source materials, including the ESOS Act, the National Code 2018, the Department of Education Fact Sheet on agent commission changes, and guidance published by the Australian Skills Quality Authority (ASQA), the Tertiary Education Quality and Standards Agency (TEQSA), and the Department of Education.

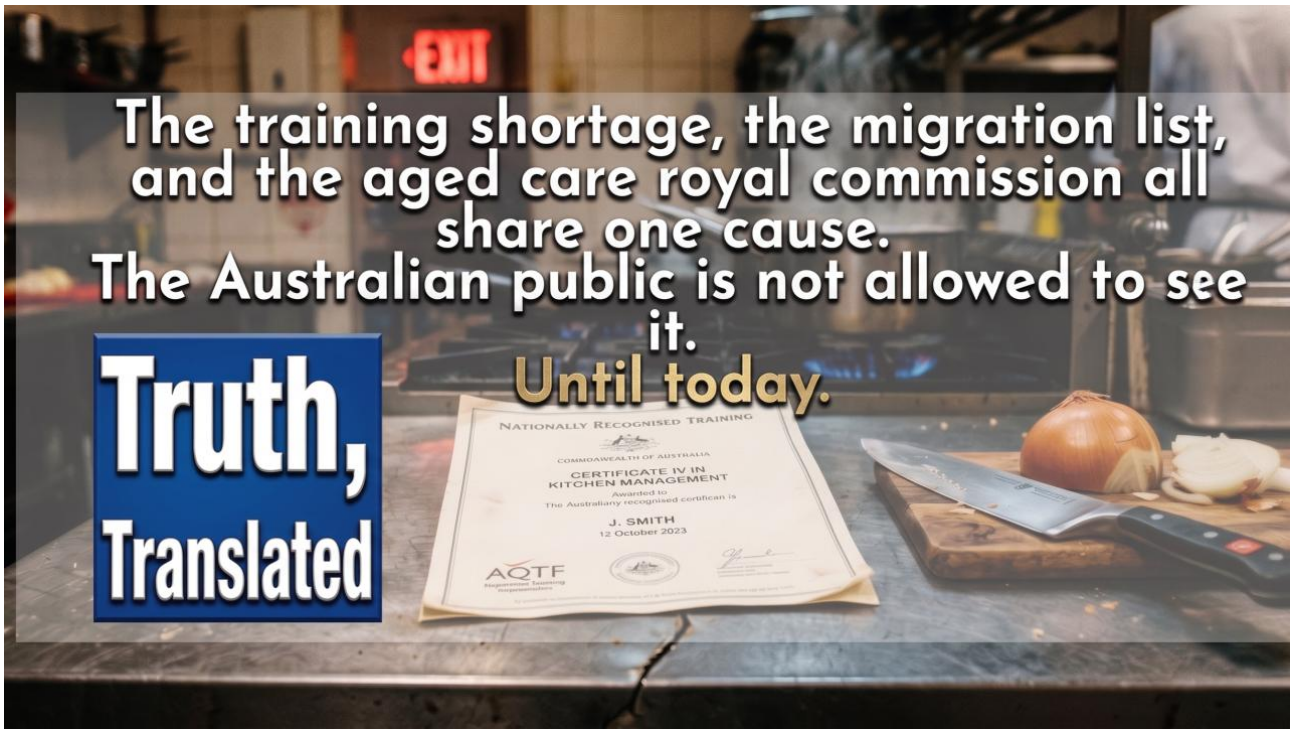
The views expressed in this post are my own and do not necessarily reflect the views of CAQA, Career Calling International, VET Sector Magazine, the Forbes Business Council, the Forttuna Education Council, or any other organisation with which I am associated.

TRUTH, TRANSLATED

The TAFE sector set the floor. The private sector took the stairs. The students fell through.

By Dr Sukh Rashpal Sandhu | First published 21 April 2026

A system that writes in volume of learning and pays in nominal hours. A framework that admits its own compromise. A sector that cannot be trusted.





Six-week cooks. Eight-week aged care workers. Twelve-week early childhood educators. And yet we keep asking why quality in Australian VET is collapsing.

A complete analysis of government-funded shortcut training, 100% online delivery of hands-on qualifications, and the published evidence from every mainland state that proves it.

Before I begin, let me be honest about what this post is.

This post is not going to be liked by many organisations. It is not going to be liked by many people inside the Australian VET sector. It is not going to be liked by ministers, regulators, public providers, or private providers who have quietly built their business models around the practices it exposes. Some will push back. Some will attack the messenger. Some will point at everything else I could have talked about instead.

That is fine. I expected all of it the moment I started writing.

Every claim in this post is verifiable on a government website. The qualification codes are on training.gov.au. The course durations are on cricos.education.gov.au. The funding formulas are on the published websites of every state training authority. The Australian Qualifications Framework is public. A reference list appears at the end of this post so you can check every statement I make for yourself.

What has been missing is not the data. What has been missing is someone in the sector willing to put it in one place, in plain language, and let the Australian public see the pattern. Once you have finished reading, make your own mind up. That is the whole point.

Cooking a safe meal for paying customers is a trade skill. It is learned in a commercial kitchen, over hundreds of hours, under the eye of a qualified chef.

Safely transferring a frail older person from a bed to a wheelchair is a clinical skill. It is learned on the floor of a real aged care facility, under supervision, through repetition.

Observing, documenting, and responding to the development of a young child in a regulated education and care service is a professional skill. It is learned in a real centre, with real children, alongside real educators.

None of those skills can be learned from a laptop at the kitchen table.

And yet, across Australia right now, thousands of people are being trained to do exactly those jobs, funded by taxpayers, delivered substantially or entirely online, and compressed into timeframes well below the Australian Qualifications Framework standardised duration. The regulator knows. The Department knows. The Minister knows. And the numbers on the government's own websites prove it.

The two terms you need to understand first.

Volume of learning is the Australian Qualifications Framework standardised duration for every qualification. It covers all teaching, learning and assessment activities: classroom training, supervised practice, unsupervised individual study, research, workplace placement, and assessment. For a Certificate III, the AQF range is 1 to 2 years, approximately 1,200 to 2,400 hours. For a Diploma, 1 to 2 years, approximately 1,200 to 2,400 hours.

Nominal hours are the anticipated hours of supervised learning deemed necessary to conduct training and assessment. They are determined by each State or Territory training authority. They are used as a funding mechanism to calculate state subsidies. In ASQA's own words, "nominal hours do not usually include time spent by a student undertaking unsupervised individual activities like assignments, projects and work experience" and "nominal hours are not intended to establish course length".

So nominal hours are always less than volume of learning. In theory, an RTO adds unsupervised study, placement and assessment hours on top of nominal hours to reach the AQF volume of learning. In practice, when a provider compresses delivery into the nominal hours only, or less, the qualification falls below the AQF baseline.

The gap you can verify today.

Across mainland Australia, every state government funds vocational training on nominal hours, not on AQF volume of learning. Every state also publishes nominal hours that are typically substantially lower than the AQF baseline for the qualification level.

For example, one Australian university publishes the total nominal hours for **CHC33021** Certificate III in Individual Support as approximately 903 hours for one combination of elective units, plus 120 hours of mandatory work placement. Another publishes the total nominal hours for **SIT30821** Certificate III in Commercial Cookery as approximately 970 hours, plus 192 hours of supervised commercial kitchen work placement. The AQF baseline for a Certificate III is 1,200 to 2,400 hours of volume of learning.

Both qualifications therefore require significant additional unsupervised study and assessment time on top of the published nominal hours to reach the AQF baseline. A provider that genuinely designs the qualification to sit within the AQF range will always deliver above the nominal hour total. A provider that compresses the qualification into the nominal hours, or less, will fall below it.

That is precisely what is happening across the sector.

What the state funding models actually pay for.

New South Wales, Smart and Skilled. Subsidies are calculated per nominal hour, on a published scale.

Queensland, User Choice. Student co-contribution is set at $1.60 per nominal training hour. Subsidies flow on the same nominal hour basis.

Victoria, Skills First. The Victorian Purchasing Guide for each training package sets the nominal hour allocations. Skills First subsidies are paid against those allocations.

Western Australia, Jobs and Skills WA. The Department of Training and Workforce Development publishes nominal hours guides and states explicitly, in writing, that "nominal hours are not hours of training or instruction. They are used to determine course fees and subsidy levels".

South Australia, Tasmania, and the Northern Territory, same model. State training authority publishes nominal hours. Subsidies flow against those hours.

Every state. Every territory. Every one of them funds training on a mechanism that is less than the AQF standardised duration requires. When a provider delivers only to the nominal hour total, the qualification falls below AQF. When a regulator approves or does not investigate this, the failure compounds.

And the CRICOS situation is worse.

On the Commonwealth Register of Institutions and Courses for Overseas Students, the same compression is visible at public providers, not only at low-fee private RTOs. The published CRICOS durations set the benchmark for the rest of the market.

Anyone can verify this in about 60 seconds. Go to **cricos.education.gov.au**, search any construction, cookery, aged care, or early childhood qualification, and read the published weeks of delivery. The numbers are public. The names are public. The pattern is public.

CPC30220 Certificate III in Carpentry. The CRICOS register lists well over 100 approved deliveries of this qualification. A Victorian TAFE institute publishes its delivery at 42 weeks. Another Victorian TAFE institute publishes at 48 weeks. A Certificate III trade qualification, the same piece of paper that feeds into carpentry licensing, delivered to international students in under a year by the state's own TAFE system. The AQF baseline for a Certificate III is 1 to 2 years.

> ***When a public provider delivers a trade in 42 weeks, the whole sector stops at 42 weeks. That is not a market failure. That is a policy failure.***

CPC50220 Diploma of Building and Construction (Building). A Western Australian state government training entity delivering under a TAFE international arm lists this diploma on CRICOS at 52 weeks. A Diploma qualification that leads toward builder registration. Compressed to the AQF minimum by a state government body.

CPC30620 Certificate III in Painting and Decorating. Across multiple CRICOS listings, published delivery durations for private providers run from 40 weeks, 48 weeks, 50 weeks, and 52 weeks. All for a trade-equivalent Certificate III. Floor to floor.

Multiply this pattern across plumbing, bricklaying, painting, tiling, cookery, hospitality, early childhood, and individual support, and you see the scale of it.

> ***Everyone blames the dodgy private RTOs. Then you look at the TAFE CRICOS durations. Then you go quiet.***

The questions nobody is answering.

If these durations cannot demonstrably meet the AQF volume of learning for a Certificate III or Diploma, **why were the providers registered in the first place**?

Who approved 42 weeks of delivery for a Certificate III trade qualification that the Australian Qualifications Framework says takes 1 to 2 years? Who approved 40 weeks for Painting and Decorating? Who signed off on a state government entity delivering a full construction Diploma in 52 weeks to international students?

Was volume of learning verified at initial registration? Was it verified at renewal? Was it ever verified by on-site observation, or was it simply accepted because a Training and Assessment Strategy said the right words on paper?

Every single one of these durations is visible on the CRICOS register right now. Every single one was approved by a regulator. Every single one is paid by international students, or subsidised by taxpayers, or both. Why are shortages of delivery not flagged at the registration stage? Why do we have a sector in which published course durations on the government's own website sit at or below the government's own qualification framework minimum, and nobody at ASQA, TEQSA, or the Department of Education has treated this as the compliance emergency it is?

These are not rhetorical questions. They are the questions the next Senate inquiry, the next ANAO audit, and the next royal commission into aged care, childcare, or construction quality will need to answer.

Why this is worse for CRICOS than for domestic.

An international student is paying anywhere from $18,000 to $30,000 for a Certificate III. They are paying for rigour. They are paying for practice hours. They are paying for the reputation of an Australian qualification.

They are often getting 42 weeks at a TAFE. Sometimes less. Frequently delivered in a classroom with simulated projects rather than on live sites, because live construction sites require insurance, supervision, and employer willingness that do not fit a 20-hour-per-week CRICOS visa study load.

And when the private RTO sector looks at what the TAFE sector delivers, the response is simple. "If the state government accepts 42 weeks as compliant, why should we deliver 60?"

That is the race to the bottom, and it is the public sector calling the pace.

The shorter the course, the faster the student finishes, the sooner they are pushed into the labour market or into a second CRICOS enrolment elsewhere, typically in a diploma that keeps their visa pathway alive. Short CRICOS durations are not an accident. They are a product.

And now the work placement question nobody is auditing.

A very large number of nationally recognised qualifications carry **mandatory** or industry-required work placement components written directly into the training package. Some are explicit and quantified: 120 hours of placement in CHC33021 Certificate III in Individual Support, 160 hours of placement in CHC30121 and CHC30125 Certificate III in Early Childhood Education and Care, 280 hours for CHC50121 Diploma of Early Childhood Education and Care, and 48 service periods (approximately 192 hours) of commercial kitchen work placement in SIT30821 Certificate III in Commercial Cookery. Others are industry-suggested or implied: construction qualifications that assume live-site practice, health qualifications that assume clinical placement, and community services qualifications that assume direct interaction with clients, families, and vulnerable people. Nursing, allied health, fitness, education support, construction supervision, automotive, plumbing, and dozens of other qualifications carry substantial placement, work-based learning, or on-the-job training requirements.

When a qualification is delivered in 42 weeks to international students, or compressed into 8 to 12 weeks for fast-track domestic students, or pushed through a 100% online delivery model, the work placement is often the **only hands-on component of the entire qualification**. Every other element of the training is delivered through videos, reading, written quizzes, multiple choice questions, and simulated role plays on Zoom.

That makes placement the single most important quality checkpoint in the qualification.

> *The "qualified assessor" may never meet the student. The form could come back signed by a person with no training qualification. The certificate might be issued anyway. This could be Australian VET in 2026.*

So now ask the obvious questions.

How does 120 or 160 or 280 hours of mandatory placement actually get completed inside a course advertised as six or eight or twelve weeks in total? Is the placement genuinely completed before the certificate is issued? Is it documented? Is it audited? Or is it quietly waved through, backdated, or treated as optional in practice even when mandatory in writing?

How does placement get done in a course marketed as **100% online**? If a provider advertises "100% online" delivery, and the qualification specifies 120 or 160 or 280 hours in a regulated service or a real workplace, one of two things is true. Either the provider is misrepresenting the delivery model in its marketing, or it is delivering the qualification without the placement. Both are serious compliance failures. Neither should continue.

And if students are finding their own placements, what is the evidence that they did it correctly?

In a large number of cases, the RTO is not the one arranging the placement at all. The student is told to "find their own". The student approaches an aged care facility, an early

learning centre, a restaurant, or a construction site, and asks for hours. The student, in effect, acts as their own placement coordinator. The RTO has no control over the quality of the host employer, the appropriateness of the supervision, the match between the placement tasks and the units of competency, or whether the student is given any meaningful work to do at all.

In some cases, the "host employer" is the student's own employer of record, a family member's business, a friend's business, or an arrangement that exists only on paper.

This shifts the entire compliance burden from the provider to a vulnerable party, often an international student or a domestic student chasing a funded certificate, and builds in a structural pressure to cut corners. Was the student actually at that service? For the required hours? Performing the specified tasks? Observed by someone who knew what they were looking at? Who verified it? On what evidence?

And now the question that keeps me awake at night. Who is signing the observation records, the placement logbooks, and the workplace supervisor forms that the RTO relies on as evidence of competency?

The standard evidence is a workplace third-party report. A form. A few ticks on a checklist. Sometimes a short written statement. Occasionally a photograph or a logbook entry. Signed by a workplace supervisor. A manager. A lead educator. A head chef. A carer who has been on the job for a few years. A registered nurse. A site supervisor. Someone on the ground who has agreed, often as a favour, to sign a form when the student hands it to them.

These signatories often hold no TAE qualification at all. Not a TAE40122 Certificate IV in Training and Assessment, which is the baseline VET pedagogical qualification. Not a TAE50122 Diploma. Not any unit of competency in assessment. Not any current industry assessor credential. Not any training in how to observe a task against a performance criterion. Not any training in how to gather valid, sufficient, authentic and current assessment evidence. Not any training in how to recognise when a student is struggling, when a task has not been performed to the required standard, or when the evidence in front of them is inadequate. In many cases, not even a copy of the assessment tool.

They sign because the student needs the form signed. They sign because the RTO has given them the form and said this is how it works. They sign because the workplace wants the relationship with the RTO to continue. They sign because there is no obvious reason not to.

And the RTO's qualified assessor, the person who actually holds the TAE qualification and is supposed to make the competency decision, accepts that signed form as evidence and ticks the student off.

That is not assessment. That is paperwork.

Think about what this means in practical terms.

A student in CHC33021 does 120 hours in an aged care facility. The placement "supervisor" is a busy registered nurse or a facility manager with no TAE qualification and no briefing on the units of competency. The supervisor ticks the form in the last ten minutes of a long shift. The form comes back to the RTO. The RTO files it. The student is

deemed competent in individual support. The student then goes and works alone with a vulnerable older adult.

A student in CHC30121 does 160 hours in an early learning centre. The room leader signing the form has a Certificate III or Diploma in Early Childhood, not a TAE. They have never seen the RTO's assessment tool. They rely on general impression and their own tolerance for novice educators. Form signed. Student deemed competent. Student then works alone with children aged zero to five.

A student in SIT30821 does their cookery placement in a quiet suburban café. The owner, a good cook with no formal qualification in training and assessment, vouches for the student. Form signed. Student deemed competent in a Certificate III trade. Student then works a live Friday night service in a city hotel.

The framework is actually clear. The enforcement is not.

Let me be fair here. The Standards for Registered Training Organisations and the associated Credential Policy are actually very clear about who can sign off on a competency judgement. Under Section 1A of the Credential Policy, to deliver training and assessment without direction, including **making assessment judgements**, a person must hold a TAE40122 Certificate IV in Training and Assessment, a predecessor like TAE40116 or TAE40110, a diploma or higher in adult education or VET, or a defined equivalent. Under Section 1B, assessment-only judgements require the same credential or a recognised Assessor Skill Set.

In other words, a workplace supervisor without a TAE credential **cannot lawfully make the competency judgement**. Their signed third-party report is **one piece of evidence**, which the RTO's TAE-qualified assessor must then weigh against the rules of evidence (valid, sufficient, authentic, current) and the principles of assessment (fairness, flexibility, validity, reliability) before declaring the student competent.

That is what the framework says. The question is whether that is what is actually happening.

And here is where the picture breaks down.

Nothing in the current audit framework requires ASQA to validate placements on site for the vast majority of registered providers. Nothing requires the regulator to speak to the workplace supervisor. Nothing requires the regulator to verify that the TAE-qualified assessor actually met the supervisor, read the third-party report with a critical eye, observed the student's practice in any form, or did anything more than tick a box on an LMS. The paperwork is accepted at face value. The signature is presumed authentic. The assessor's judgement is presumed safe.

And the bigger question is this. Is the framework being applied **consistently** across private RTOs, public RTOs, TAFEs, and state government training entities?

Because a simple look at the duration of courses tells a very different story.

If a Victorian TAFE delivers a trade Certificate III in 42 weeks, and a Western Australian state government training entity delivers a construction Diploma in 52 weeks, how are those durations consistent with the TAE-qualified assessor spending sufficient time with

each student, validating each third-party report, observing practice in the workplace, and making a defensible competency judgement against the rules of evidence? If the private sector would be audited for delivering the same qualification in the same timeframe, why are public providers not held to the same standard in practice?

If ASQA auditors sat down with the workplace supervisors whose signatures appear in a random sample of placement logbooks across Australia, at both private RTOs and public providers including TAFEs, and asked them what they were looking at when they signed, what they were told their role was, how much time the RTO's qualified assessor spent with them, and whether the assessor ever observed the student, the answers would not just expose individual providers. They would expose an **enforcement inconsistency** baked into the way the system is audited.

Nobody is asking. And that is the point.

Everybody in the sector knows this. Genuine RTOs, whether public or private, spend substantial money and resources on qualified workplace assessors, on-site visits, structured debriefs, and proper third-party report validation by the TAE-qualified decision-maker. Fast-track providers, whether public or private, do not. And under the current audit regime, the two are indistinguishable on paper.

If that is the system, then the certificate the student walks away with is, in far too many cases, attached to a third-party report that was never properly validated by anyone with the credential to validate it, and a final competency decision that exists more in name than in substance.

Case study one. Commercial cookery.

A legitimate delivery of **SIT30821** sits at or above AQF volume of learning, 1,200 hours or more, with 192 hours of supervised work placement across 48 service periods in a live commercial kitchen.

A fast-track delivery, built only on the nominal hour total, compressed into six months or less, substantially online. The person who will handle raw chicken, sharpen a knife, run a sauté pan, calculate allergen contamination, and manage a live service at 7pm on a Friday night, was trained largely by watching videos and answering written quizzes.

This is not food safety. This is food *roulette*.

Case study two. Individual support.

CHC33021 is the entry qualification for support workers across aged care, the NDIS, and in-home care. Graduates bathe older Australians. They transfer people from wheelchair to bed and back again. They assist with toileting and medication prompting. They manage dementia behaviours. They are often alone with a vulnerable adult for hours at a time.

The training package mandates 120 hours of supervised work placement. The AQF baseline is 1,200 hours of volume of learning. And fast-track providers continue to offer completion in as little as eight to twelve weeks, with flexible, self-arranged, frequently unaudited placement.

Ask yourself. Would you let a worker who learned manual handling from a video transfer your mother from a toilet seat to a shower chair? Would you trust medication prompting to a person who was never observed doing it by a qualified assessor?

This is not aged care. This is aged *neglect*, with a government-funded certificate attached.

Case study three. Early childhood education and care.

CHC30121 (superseded by CHC30125) requires a minimum of 160 hours of work placement in a regulated children's education and care service, as stated on training.gov.au. Educators complete observations, write developmental records, plan learning experiences aligned to the Early Years Learning Framework, manage group dynamics, respond to safety incidents, and raise child protection concerns.

Some providers build the qualification out to the AQF 1,200-hour baseline. Others compress it to nominal hours only. Both deliveries result in **the same nationally recognised certificate**, and the same pathway into an early learning centre to work with children aged zero to five.

The National Quality Standards expect educators to "know each child" and respond to individual development. That knowledge is not built through video modules. It is built through hundreds of hours of real observation, reflection, feedback, and supervised practice in a real centre.

This is not early childhood education. This is *childcare by a***ssembly line**, at a developmental window when the cost of getting it wrong can last a lifetime.

Why this happens.

Because the money rewards it.

Every government, state and federal, funds vocational training through completion-based subsidies paid on nominal hours. An RTO is paid when a student **finishes** the course. Finish more students, faster, and the revenue multiplies. Slow, rigorous, hands-on training that goes well above nominal hours is **financially penalised** under this model.

A provider who delivers a Certificate III in 1,500 legitimate hours earns no more than a provider who delivers the same certificate compressed into nominal hours only. Both tick the same funding box. One produces a competent worker. The other produces a piece of paper.

The incentive structure is upside down.

Fee-free TAFE, JobTrainer, Skills First, Smart and Skilled, User Choice, Jobs and Skills WA, and their South Australian, Tasmanian and Territory equivalents. Every one of these programs sits on the same nominal-hour-based completion funding logic. Every one of these programs rewards volume over depth. And the Commonwealth does not price quality. It prices tick-boxes.

The political layer.

On top of the financial incentive sits a political one.

Aged care reform needs hundreds of thousands of additional workers. The early learning sector needs tens of thousands more educators. Hospitality is reeling from post-pandemic workforce shortages. Migration settings are tied to Skilled Occupation Lists that reward specific VET qualifications.

Every election cycle, a minister stands up and promises "fast tracked" training to fill the shortage. The implicit message to the sector is simple. **Get them through**. **Get them qualified**. **Get them into the workforce**. The numbers matter for the press conference. The quality does not.

Meanwhile the regulator issues guidance about volume of learning, then keeps approving delivery models that sit at or below the nominal hour floor.

Who is actually paying the price.

Not the ministers. Not the providers. Not the brokers.

The infant in a nursery room whose new educator was never observed on the floor of a regulated service.

The 82 year old dropped in a hoist because the support worker learned manual handling from a slide deck.

The diner in anaphylactic shock because the cook never practised allergen separation in a real kitchen.

The honest student who completed a 12-month course properly and now competes for jobs against fast-tracked graduates holding identical certificates.

The employer who hires a "qualified" graduate only to discover they cannot actually do the job, then pays to retrain them.

The genuine RTO that refuses to cut corners and loses market share to competitors who will.

What needs to change.

Align state funding structures with AQF volume of learning. Do not subsidise qualifications at nominal-hour totals that the AQF itself says are insufficient to achieve competency.

Hold TAFEs and public providers to a higher CRICOS standard, not a lower one. If a public provider delivers a trade Certificate III in 42 weeks, the entire private sector uses that as the ceiling. Publicly owned providers must deliver at or above the AQF midpoint, not at the floor.

Cap online delivery for hands-on qualifications. If the training package specifies observation of practical performance, the qualification cannot be delivered entirely online.

Mandate genuine, audited supervision of work placement. No self-arranged loopholes. Every placement must be coordinated, monitored, and validated by a TAE-qualified assessor from the RTO. Third-party reports from workplace supervisors who hold no training and assessment qualification must not be treated as the primary evidence of competency. The qualified assessor must observe the student in the workplace, at least once per placement, in person or by secure verified video, and the evidence of that

observation must be retained and auditable. Every placement logbook signature must be traceable to a workplace supervisor whose identity, role, and industry currency can be verified. Every workplace supervisor providing third-party evidence should be briefed in writing by a qualified assessor before the placement begins, and the RTO's TAE-qualified assessor must personally validate the evidence, not rubber-stamp it.

Reform completion-based funding so quality is rewarded, not just throughput. Fund providers to train, not to churn.

Fund genuine on-site audits by ASQA. Watch training happen in real classrooms, real kitchens, real aged care facilities, and real early learning centres. Not just document reviews in an office.

Publish volume of learning data by provider. Let the market see which RTOs are operating at 1,500 hours and which are operating at 500.

Criminalise systematic breach of training package requirements. Not a warning. Not a reregistration condition. A *prosecution*.

Protect honest students whose reputations are diluted by sharing a certificate with shortcut graduates. Offer verified quality markers for RTOs delivering at or above AQF baseline.

The real moral.

A qualification that is delivered in a fraction of the required time, largely or entirely online, for a vocation that cannot be practised without hands, is **not a qualification**. It is a piece of paper with a number on it.

Every time a government funds it, every time a regulator waves it through, every time a provider markets it, the people who pay the price are the children, the elderly, the disabled, the unwell, the restaurant goer, the honest worker, and the nation's trust in its own certifications.

Quality is not a luxury in vocational education. **It is the whole point.**

Until Australia remembers that, we will keep training six-week cooks, eight-week aged care workers, and twelve-week early childhood educators. And we will keep asking, year after year, why the aged care royal commissions, the childcare scandals, the hospitality incidents, the preventable injuries, and the workforce crises never seem to go away.

They never go away because we keep training for them.

References and sources.

Every claim in this post can be verified through the following publicly available Australian Government and State Government sources.

1. Australian Qualifications Framework volume of learning ranges, including Certificate III at 1 to 2 years (1,200 to 2,400 hours) and Diploma at 1 to 2 years (1,200 to 2,400 hours). Source: Australian Qualifications Framework, "Volume of Learning: An Explanation" (Second Edition), published at aqf.edu.au. Also confirmed on the ASQA website under "Volume of Learning" and "What is an appropriate volume of learning for a qualification type".

2. ASQA definition of volume of learning as covering "all teaching, learning and assessment activities, supervised and unsupervised, structured and unstructured", and the distinction from nominal hours. Source: ASQA, "Determining appropriate training and course duration" at asqa.gov.au.
3. ASQA statement that "nominal hours do not usually include time spent by a student undertaking unsupervised individual activities like assignments, projects and work experience" and that "nominal hours are not intended to establish course length". Source: ASQA "Determining appropriate training and course duration" guidance page.
4. ASQA environmental scan finding that more than a quarter of 11,000 advertised courses had durations below the AQF minimum, with aged care, early childhood education and care, construction, and security flagged as high-risk industries. Source: ASQA, "A Review of Issues Relating to Unduly Short Training".
5. Qualification packaging rules, including mandatory placement hours (CHC33021 Certificate III in Individual Support: 120 hours; CHC30121 Certificate III in Early Childhood Education and Care: 160 hours; SIT30821 Certificate III in Commercial Cookery: 48 service periods of commercial kitchen work placement, equating to approximately 192 hours). Source: training.gov.au.
6. Published nominal hour totals for specific qualifications, for specified combinations of elective units, as published on individual university and college course information pages referenced in the body of this article. Nominal hours vary by elective choice and are set by each state training authority.
7. New South Wales Smart and Skilled subsidy structure, paid per nominal hour, on the published scale determined by IPART and administered by the NSW Department of Education. Source: nsw.gov.au and ipart.nsw.gov.au.
8. Queensland User Choice program, student co-contribution of $1.60 per nominal training hour. Source: Queensland Training Information Service at qtis.training.qld.gov.au.
9. Victorian Skills First program funding against nominal hour allocations set in the Victorian Purchasing Guide for each training package. Source: vic.gov.au and education.vic.gov.au.
10. Jobs and Skills WA subsidy methodology, based on published nominal hours. Source: Department of Training and Workforce Development, Western Australia, at dtwd.wa.gov.au. Confirmed statement, "Nominal hours are not hours of training or instruction. They are used to determine course fees and subsidy levels."
11. Tasmania, South Australia, and Northern Territory state training authority nominal hour-based subsidy models. Source: skills.tas.gov.au, relevant South Australian and NT training authority websites.
12. CRICOS-approved course durations for specified qualifications (CPC30220 Certificate III in Carpentry, CPC50220 Diploma of Building and Construction (Building), CPC30620 Certificate III in Painting and Decorating), including durations of 42, 48, 50, and 52 weeks at a range of public and private providers. Source: cricos.education.gov.au. Any reader can replicate the search by entering the qualification code at that address.
13. National Quality Standards for Early Childhood Education and Care, including expectation that educators "know each child". Source: Australian Children's Education and Care Quality Authority at acecqa.gov.au.

14. Australian Government funded VET programs: Fee-free TAFE, JobTrainer. Source: dewr.gov.au and education.gov.au.
15. Credential Policy under the Revised Standards for Registered Training Organisations, including Section 1A (training and assessment credentials required to make assessment judgements), Section 1B (assessment-only credentials), Section 1C (actively working towards credentials), Section 1D (training and assessment under direction), and Section 1E (providing direction on the delivery of training and assessment). Listed credentials include TAE40122 Certificate IV in Training and Assessment (current), TAE40116 and TAE40110 (superseded), TAE50122 Diploma of Vocational Education and Training, and defined equivalents including a diploma or higher in adult education or VET. Rules of evidence (valid, sufficient, authentic, current) and principles of assessment (fairness, flexibility, validity, reliability). Source: asqa.gov.au and the Standards for Registered Training Organisations on the Federal Register of Legislation.
16. Training package placement requirements referenced in this post: CHC33021 Certificate III in Individual Support (120 hours), CHC30121 and CHC30125 Certificate III in Early Childhood Education and Care (160 hours), CHC50121 Diploma of Early Childhood Education and Care (280 hours), SIT30821 Certificate III in Commercial Cookery (48 service periods, approximately 192 hours). Source: qualification packaging rules and Assessment Requirements of individual units of competency at training.gov.au.
17. National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025, made under subsection 185(1) of the National Vocational Education and Training Regulator Act 2011. Registered on the Federal Register of Legislation on 14 March 2025. Commenced 1 July 2025. Contains Schedule 1 Outcome Standards structured across four Quality Areas: Training and Assessment (Standards 1.1 to 1.8), VET Student Support (Standards 2.1 to 2.8), VET Workforce (Standards 3.1 to 3.3), and Governance (Standards 4.1 to 4.4). Source: legislation.gov.au and asqa.gov.au.
18. Supporting Students with Disability in VET. Published by the Department of Employment and Workplace Relations (DEWR) as part of the toolkit supporting compliance with the Disability Standards for Education 2005 (Cth) and Standard 2.4 of the Outcome Standards. Source: dewr.gov.au.

The standards that apply. And what they actually say.

This is not a matter of opinion. There is a legislative instrument in force. The National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025, made under subsection 185(1) of the National Vocational Education and Training Regulator Act 2011, commenced on 1 July 2025 and applies to every NVR registered training organisation in Australia, including TAFEs, private RTOs, enterprise RTOs, and every CRICOS provider.

The Outcome Standards are organised into four Quality Areas. Every standard discussed below is law, not guidance. Every standard below is directly engaged by the practices described in this post.

Quality Area 1. Training and assessment.

Standard 1.1 Training is engaging, well-structured, and enables VET students to attain skills and knowledge consistent with the training product. The RTO must demonstrate that training is consistent with the training product, that the modes of delivery enable attainment of skills and knowledge, that training is **structured and paced to support VET students to progress**, providing sufficient time for instruction, practice, feedback and assessment, and that where the training product requires work placement or other community-based learning, the necessary skills and knowledge are able to be attained in that environment. A six-week cookery course or a forty-two-week trade Certificate III cannot credibly claim "sufficient time for instruction, practice, feedback and assessment" if AQF volume of learning for that qualification is 1,200 to 2,400 hours.

Standard 1.2 Engagement with industry, employer and community representatives informs the industry relevance of training. The RTO must show that it identifies relevant industry representatives, seeks meaningful advice and feedback, uses that feedback to inform its training and assessment strategies, and that training reflects current industry practice. A fast-track online delivery model designed around a completion-based funding formula is not, by definition, designed around current industry practice.

Standard 1.3 The assessment system is fit-for-purpose and consistent with the training product. Assessment must be consistent with training product requirements, and assessment tools must be reviewed prior to use. A system which relies on tick-box workplace third-party reports completed by unqualified supervisors is not a fit-for-purpose assessment system.

Standard 1.4 The assessment system ensures assessment is fair and appropriate and enables accurate assessment judgement. The **principles of assessment** are fairness, flexibility, validity, and reliability. Validity specifically requires that "assessment includes practical application components that enable the VET student to demonstrate the relevant skills and knowledge in a practical setting." Reliability requires that "assessment evidence is interpreted consistently by assessors and the outcomes of assessment are comparable irrespective of which assessor is conducting the assessment." The **rules of evidence** are validity, sufficiency, authenticity, and currency. A qualified assessor who has never observed the student, never met the workplace supervisor, and relies solely on a tick-box form cannot credibly demonstrate compliance with any of these principles or rules.

Standard 1.5 The assessment system is quality assured by appropriately skilled and credentialled persons through regular validation of assessment practices and judgements. Every training product on the scope of registration must be validated at least once every five years, on a risk-based approach. If a validation activity were conducted honestly against compressed online deliveries with self-arranged placements, entire scopes of registration would come under immediate review.

Standard 1.6 and Standard 1.7 Recognition of prior learning and credit transfer. Where a compressed delivery model is effectively selling Recognition of Prior Learning under another name, by giving credit for undocumented "prior experience" through token assessment, these standards are engaged and breached.

Standard 1.8 Facilities, resources and equipment for each training product are fit-for-purpose, safe, accessible and sufficient. This standard explicitly requires documented

strategies and procedures to identify and manage risks associated with VET students using facilities, resources and equipment **when undertaking work-integrated learning, work placements, or other community-based learning**. Self-arranged placements with no provider oversight cannot meet this requirement. A "find your own placement" model is, by definition, a failure to manage placement risk.

Quality Area 2. VET student support.

Standard 2.1 VET students have access to clear and accurate information. The standard requires, among other things, that students are informed about the training product's duration, modes of delivery, any requirements to commence or complete the training product including assessment requirements, and **any requirements for VET students to undertake work placements**. Marketing that claims "100% online" when the qualification has a mandatory placement is an immediate breach of this standard.

Standard 2.2 VET students are advised, prior to enrolment, about the suitability of the training product for them, taking into account the student's skills and competencies. A pre-training review is required, including LLN and digital literacy. Where enrolments are being driven by visa pathways or completion-based funding incentives, this standard is rarely discharged properly.

Standard 2.3 Access to trainers, assessors and support staff who are responsible for supporting the VET student. A six-week online delivery with minimal trainer contact does not meet this standard. A fast-track model in which the "trainer" is effectively a Learning Management System does not meet it either.

Standard 2.4 Reasonable adjustments are made to support VET students with disability on an equal basis. The Department of Employment and Workplace Relations Supporting Students with Disability in VET framework sets out how this is operationalised. Compressed delivery makes genuine disability support almost impossible to deliver.

Standard 2.5, **Standard 2.6**, **Standard 2.7**, **Standard 2.8** Diversity and inclusion, wellbeing support, feedback and complaints, appeals. All of these standards require real relationships with real students, which are structurally incompatible with fast-track online delivery models.

Quality Area 3. VET workforce.

Standard 3.1 The workforce is effectively managed to ensure appropriate staffing to deliver services. The number of trainers and assessors must be appropriate for the delivery. An RTO delivering hundreds or thousands of compressed online enrolments across multiple hands-on qualifications, with a small assessment team and no meaningful workplace presence, is not compliant with this standard, regardless of what is written in the Training and Assessment Strategy.

Standard 3.2 Training and assessment is delivered by credentialled people with current skills and knowledge in training and assessment. This standard activates the entire Credential Policy: TAE40122, TAE40116, TAE40110, TAE50122, the Assessor Skill Sets, and defined equivalents. Critically, where a person delivers training or assessment **Under Direction** (Sections 1C, 1D), the RTO must have systems in place to ensure that person **does not make assessment judgements**. A workplace supervisor, whose role is to complete a

third-party report, is not making the assessment judgement. That judgement must be made by the credentialled assessor. If in practice the credentialled assessor is rubber-stamping the supervisor's form without independent validation, this standard is breached.

Standard 3.3 Training and assessment is delivered by persons with current industry skills and knowledge. Trainers and assessors must have industry competencies, skills and knowledge at least to the level of the training product, and maintain an understanding of current industry practices. This is where most sham arrangements quietly fail, because currency cannot be manufactured on paper alone.

Quality Area 4. Governance.

Standard 4.1 An NVR registered training organisation operates with integrity and maintains accountability for the delivery of quality services. Governing persons must act diligently and make informed decisions which facilitate compliance, and lead a culture of integrity, fairness, and transparency. If a CEO, Chief Operating Officer, or Compliance Manager knows that a course is being delivered in a fraction of the AQF volume of learning, with placements self-arranged and third-party reports rubber-stamped, and allows it to continue for commercial or political reasons, this standard is directly in play.

Standard 4.2 Roles and responsibilities of staff and third parties are clearly defined and understood. Third-party arrangements must be governed by written agreements, with the RTO retaining responsibility for compliance. Outsourced placements, unsupervised external assessors, and informal "arrangements" with workplaces are all caught by this standard.

Standard 4.3 Risks to VET students, staff and the organisation are identified and managed. This includes **risks to the safety and wellbeing** of students aged under 18, by reference to the training content and modes of delivery and in accordance with the National Principles for Child Safe Organisations. It also includes managing conflicts of interest. Where placement is arranged inside a student's own family business, where assessors are also recruiters, or where commercial partners influence assessment outcomes, this standard is breached.

Standard 4.4 Systematic monitoring and evaluation to support continuous improvement. The RTO must have a system for monitoring its own performance and using feedback from students, staff, industry, VET regulators, and state and territory training authorities. An RTO that receives repeated complaints about inadequate training, but continues to sign off competency, is failing this standard.

The compliance picture.

Read those twenty-plus Standards together and the picture is clear. A fast-track online delivery of a hands-on Certificate III, with compressed volume of learning, self-arranged placement, unqualified workplace sign-off, and a rubber-stamp competency decision by a credentialled assessor who never sets foot in the workplace, is not one breach. It is potentially a breach of Standards 1.1, 1.3, 1.4, 1.5, 1.8, 2.1, 2.2, 2.3, 3.1, 3.2, 3.3, 4.1, 4.2, 4.3, and 4.4 simultaneously.

The same delivery offered by a public provider, at the same duration, through the same model, on CRICOS, triggers exactly the same Standards. The law does not distinguish between a private RTO and a TAFE. The enforcement in practice, however, does.

That is the heart of the matter.

#VETSector #VolumeOfLearning #AQF #ASQA #CRICOS #TAFE #AgedCare #EarlyChildhood #Hospitality #Carpentry #CHC33021 #CHC30121 #SIT30821 #CPC30220 #CPC50220 #QualityNotQuantity #SmartAndSkilled #SkillsFirst #UserChoice #JobsAndSkillsWA #InternationalEducation #RTOReform #WorkPlacement #TAE40122 #AssessmentIntegrity #StandardsForRTOs2025 #CAQA

Disclaimer.

This post is general commentary written in my personal capacity, drawn from more than 30 years of experience in Australia's vocational education and training sector. It is not legal advice and must not be relied on as legal advice.

The analysis behind this post draws on the detailed review of hundreds of private and public training organisations across Australia, alongside published government data, CRICOS register listings, state training authority subsidy models, and qualification documentation on training.gov.au. Every observation in this post is drawn from patterns visible across hundreds of providers, not from a single case, and can be verified by any reader using the sources cited above.

I have chosen, deliberately, not to name specific providers in this post. That choice reflects two things. First, the sector-wide pattern matters more than any one organisation, and focusing on names distracts from the structural failure. Second, every reader with a phone and a browser can go to cricos.education.gov.au or training.gov.au and confirm the figures for themselves in under a minute. The names are publicly available. The durations are publicly available. The funding formulas are publicly available. This post does not break any news. It simply assembles, in one place, what the government has already published, and asks the questions that nobody with responsibility for the system has been willing to answer in public.

No identification of any individual provider, agent, or organisation is intended in this post, and none should be inferred.

The question I am leaving with every regulator, minister, policymaker, and sector leader reading this.

When the rules of your system are this free-flowing, how do you actually manage any of the following?

Compliance. If nominal hours are disconnected from AQF volume of learning, and providers can deliver to the lower figure, what does "compliant" actually mean, and how does a regulator defend approving it?

Transparency. When the public cannot find out, without digging, that a Certificate III funded by their taxes is being delivered in 42 weeks rather than the AQF 1 to 2 year baseline, what is the word for a system that hides its own design behind technical terminology?

Quality assurance. If a Training and Assessment Strategy on paper is accepted as proof of rigour, and nobody watches the actual training happen, what is being assured?

Accountability. Who is answerable when an aged care worker, a cook, or an early childhood educator reaches the workplace unprepared, and the regulator's defence is "we followed the process"?

Student outcomes. How do you measure whether a qualification produced a competent worker, when the only metric being counted is course completion?

Regulatory integrity. What is the point of a regulator that writes about volume of learning while approving CRICOS deliveries that cannot meet it?

Public trust. If the system the public is funding cannot be explained to the public in plain English, why is the public paying for it?

Workforce readiness. How does Australia promise industry a pipeline of skilled workers while the qualifications at the entry level are being delivered at a fraction of the time the AQF says they need?

Sector reputation. Every rogue outcome, every workplace injury, every aged care scandal, is partly a story about who delivered the training and how long it took. At what point does the cumulative damage to the reputation of Australian VET outweigh the convenience of the current funding model?

International credibility. Australia markets its qualifications to the world. What happens when international students, employers, and governments work out that the CRICOS duration on the register is the compressed floor, not the educational ceiling?

Consumer protection. What protection does a student have, domestic or international, against enrolling in a qualification that looks identical on the testamur to a genuinely rigorous one, and is in fact a fraction of the experience?

Ethical governance. What does it say about the ethics of a sector where the incentives push in one direction and the regulatory language pushes in another, and every serious insider has known for years?

Placement integrity and enforcement consistency. The Standards for RTOs require that the competency decision be made by a TAE-qualified assessor, and that third-party reports from workplace supervisors be validated by that assessor against the rules of evidence. If the published course durations on CRICOS show public providers, including TAFEs, delivering trade Certificates in 42 weeks, how is the same TAE-qualified assessor meaningfully validating every third-party report, observing practice, and making a defensible competency judgement in that timeframe? And if the private sector would be audited for the same delivery, on what basis is the enforcement applied inconsistently?

Assessment integrity. If competency decisions are resting on workplace supervisor signatures from people who may hold no TAE qualification, no assessor training, and no written brief from the RTO, what is the competency decision actually worth? And when did this become acceptable?

These are not rhetorical questions. They are the questions the next Senate inquiry, the next ANAO performance audit, and the next royal commission will ask. The answers will

not be comfortable for the people who have spent the last decade saying everything is fine.

The views expressed in this post are my own and do not necessarily reflect the views of CAQA, Career Calling International, VET Sector Magazine, the Forbes Business Council, the Forttuna Education Council, or any other organisation with which I am associated. Readers should obtain independent legal advice from a qualified Australian lawyer before making or changing any decision relating to training design, delivery, funding claims, or regulatory responses.

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TRUTH, TRANSLATED

Over 43,000 Qualifications Cancelled. 15 Regulatory Actions. 232 Serious Matters Under Investigation. The Scandal Australia's VET Sector Must Face

By Dr Sukh Rashpal Sandhu | First published 27 April 2026

Thousands of students left in the lurch. Over 15 providers shut down, with 200 more under investigation. This is the scandal Australia's VET sector can no longer ignore.



By Sukh Sandhu

Forty-five thousand qualifications and certificates issued. Over fifteen providers cancelled. Approximately two hundred more are currently under investigation. Read those three figures together and understand that what Australia is dealing with is not a compliance problem. It is a systemic collapse, and the sector's measured, bureaucratic response to it is a disgrace proportionate to the scale of harm being done.

Stop reaching for the policy language. Stop talking about continuous improvement frameworks and quality indicator data. The people behind those forty-five thousand cancelled qualifications and certificates, the vast majority of whom have never heard of

RPL, have never read a word of the Standards for RTOs 2025, and could not tell you what ASQA stands for, enrolled in what they were told were legitimate training courses, paid real money, trusted a registered system, and received qualifications that are now worthless. And if the two hundred providers currently under investigation produce further cancellations, that number will not stay at forty-five thousand. It will grow. Nobody is saying that loudly enough.

The Roll Call of Failure

Read this list carefully. These are not abstractions. These are registered training organisations that appeared on the National Training Register, recruited students, collected fees, and issued credentials with no legitimate training or assessment behind them.

Luvium Pty Ltd, trading as Australia Education and Career College (RTO 52865), cancelled 6 November 2024. International Institute of Education and Training Pty Ltd, trading as EDU VET (RTO 40993), cancelled 21 November 2024. Gills College Australia Pty Ltd, trading as Elite College Australia and Sterling Business College (RTO 2417), cancelled 26 November 2024. DSA Ventures Pty Ltd, trading as Australian Academy of Elite Education (RTO 45442), cancelled 18 December 2024. Learning Options, Contract Me Pty Ltd (RTO 88174), cancelled 15 May 2025. Nextgen Tech Institute, formerly Australian Learning Academy, Qualify Now Pty Ltd (RTO 32025), cancelled 15 May 2025. SPES Education Pty Ltd (RTO 46018), cancelled 17 May 2025. Arizona College Pty Ltd (RTO 1412), cancelled 1 July 2025. Harbour City College Pty Ltd (RTO 41502), cancelled 1 July 2025. Christa College Pty Ltd (RTO 45458), cancelled 1 August 2025. DSA Ventures Pty Ltd, trading as Australian Academy of Elite Education (RTO 45442), cancelled again 1 August 2025. Kingsway Vocational Training Pty Ltd (RTO 41374), cancelled 13 November 2025. Gills College Australia Pty Ltd (RTO 2417), cancelled again 4 December 2025. Phytodermal Institute of Beauty Pty Ltd (RTO 40542), cancelled 7 January 2026. Baker Ebert Pty Ltd (RTO 40958), cancelled 29 January 2026. BG College of Vocational Education and Training Pty Ltd, trading as Safeguard School of Trades (RTO 45850), cancelled 8 April 2026. Melbourne Training Centre Pty Ltd (RTO 45579), cancelled 23 April 2026.

Over fifteen regulatory actions across eighteen months of accumulating regulatory consequence. And now, according to ASQA, approximately two hundred more providers are under active investigation.

Two hundred more.

If even a fraction of those investigations result in further cancellations, the number of cancelled qualifications and certificates left in students' hands will dwarf everything that has already been reported. This is not the tail end of a problem being cleaned up. This is the visible surface of something far larger still unfolding underneath.

The Students Who Had No Way to Know

Here is the reality the sector needs to sit with and stop politely stepping around. If regulators with full access to registration data, audit findings, complaints intelligence, enrolment patterns, and systemic risk indicators did not identify and act on these providers for years, how exactly was a migrant worker in Melbourne, a childcare employee in Brisbane, or an aged care trainee in Perth supposed to know? What tool did they have

that ASQA did not? What access did they possess that the regulator lacked? The answer is none. They had nothing. And the system that failed to protect them is now asking them to carry the consequences.

The students who were targeted by these providers were not choosing non-genuine RTOs because they wanted to cut corners. They were choosing them because the system gave them no reliable way to distinguish a fraud operation from a legitimate training provider. Both appeared on the same national register. Both could advertise freely. Both could issue qualifications that looked identical on a USI transcript. The non-genuine providers were often cheaper, faster, and more aggressively marketed, precisely because they had no actual training to deliver.

If the National Training Register is the public's guarantee of provider legitimacy, why were providers operating for years in breach of the Standards while remaining listed as registered? Who decided the audit cycle frequency that allowed this to continue? Who approved the risk-based monitoring settings that did not flag these providers earlier? Who signed off on the funding rules that made enrolment-driven fraud financially viable in the first place? These are not rhetorical questions. They are governance questions with identifiable answers, and none of those answers have been made public.

Many of these students are migrants and international graduates for whom the qualification represented a pathway to permanent residency, skilled employment, or a licensing requirement in their industry. Many are workers in aged care, construction, security, and childcare who enrolled because their employer or their migration agent told them they needed the credential. Many saved for months to afford the fees. Many took out loans. Many do not speak English as a first language and had no realistic capacity to interrogate the legitimacy of a provider the Australian government had registered and continued to list as compliant.

Why did it take cancellations at this scale before the ministers held press conferences? Where were the press conferences two years ago when the sector was awash with providers marketing qualifications in days and hours? Where were the urgent policy announcements when the race to the bottom on fees and duration was being documented publicly and discussed openly within the industry? Why does decisive public communication arrive only after the harm is done and the cameras are rolling?

ASQA and the Department of Employment and Workplace Relations have both confirmed that holding a cancelled qualification does not mean the student engaged in fraud. That is correct and it is important. It is also being communicated primarily through FAQ documents and website pages that the affected students are not reading, cannot easily find, and in many cases cannot fully understand even if they do find them. Plain-language, multilingual, proactive, direct communication to every holder of those forty-five thousand cancelled qualifications and certificates has not happened. A website update is not communication. It is the appearance of communication.

And when ministers stand at podiums and announce investigations, task forces, and awareness campaigns months or years after the harm accumulated, the question that must be asked is this: who is that press conference for? It is not for the student holding a worthless credential who cannot get their employer to accept it. It is not for the worker

whose visa pathway has collapsed. It is not for the trainer who built a career on a TAE qualification now cancelled. The press conference is for the minister. The article published by the regulatory body six months after the damage was done is for the regulatory body. The people who needed action got a media cycle. That is the definition of institutional self-protection dressed as accountability.

The Guidance Is Written for a Person Who Does Not Exist

The official guidance to affected students says: contact your new RTO, explain that your previous qualification has been cancelled, engage in RPL if you have robust evidence of competency, and document everything. That guidance is technically correct. It is also written for a person who knows what RPL is, knows how to compile a competency evidence portfolio, knows how to map their experience against units of competency, understands the principles of assessment, and has the financial resources and time to re-engage with a training system that already failed them once.

That person is not who is holding these cancelled credentials.

RPL, done with genuine rigour, requires a structured competency conversation, documented evidence against each unit, workplace observation in many cases, and sign-off by a qualified assessor who can demonstrate the evidence is valid, sufficient, current, and authentic. A person who received no genuine training, was never assessed properly, and has spent the intervening period working in a role on the basis of a credential that was fraudulently issued has no natural starting point for that process. Telling them to apply for RPL without providing funded, accessible support to navigate it is the system washing its hands of the consequences of its own failure.

The TAE Contamination: A Sector-Wide Emergency That Has Not Been Fully Quantified

Among the qualifications cancelled across these seventeen providers is an unknown but significant proportion of TAE credentials, the mandatory Certificate IV in Training and Assessment required of anyone working as a trainer or assessor in the VET sector. The contamination this creates is exponential, not linear.

Every trainer or assessor who obtained their TAE through a now-cancelled provider and then went on to deliver training and conduct assessments at a legitimate RTO has potentially invalidated the competency sign-offs on every student they assessed. ASQA's guidance is clear on this: review, validate, and reassess where appropriate. But that guidance does not come with a funded remediation mechanism. It comes with an instruction and an obligation placed on the receiving RTO to manage a problem they did not create.

A single trainer operating over two or three years could have assessed hundreds of students. Multiply that across the trainers who hold cancelled TAE qualifications across all the affected providers, and the number of student records requiring review is a number nobody has yet published. If two hundred further providers are under investigation and some percentage of their issued qualifications are also TAE credentials, the contamination chain extends further still. This is a sector-wide emergency that is being addressed as though it is a series of individual compliance events. It is not. It is a structural integrity failure, and treating it as anything less is dangerous.

RPL Was The Murder Weapon

Recognition of Prior Learning was designed to give people who built genuine skills through decades of work and life experience a formal pathway to credential recognition. It is one of the most powerful and equitable mechanisms in the VET sector when it operates with integrity. It was also the preferred instrument of destruction used by non-genuine providers against the very populations it was designed to serve.

Non-genuine RPL requires no classroom, no timetable, no observable training delivery, no equipment, and no qualified staff available for scrutiny. It requires a fee, a form, and the willingness to issue a certificate to anyone who pays. Some of the providers now cancelled were marketing qualifications achievable within days, sometimes hours, through RPL processes that bore no resemblance to any legitimate competency assessment. Their marketing was frequently aimed at people under visa pressure, people in industries requiring mandatory credentials, and people who lacked the sector knowledge to recognise that a qualification issued without genuine assessment is not a qualification at all.

The "Real Skills Deserve Real Recognition" campaign is a worthwhile public awareness initiative. It will help future students ask better questions before enrolling. It offers nothing to the students who were already exploited before the campaign existed. Awareness protects the next cohort. The current cohort needed protection that arrived years too late.

The Question Nobody Is Asking Loudly Enough

How long were these providers known to carry elevated risk before cancellation action was completed? That question has not been answered publicly. The earliest cancellation on the current register is dated 6 November 2024. Several of the providers involved were registered and actively enrolling students for years before that date. The qualifications they issued during those years of operation are now cancelled. The fees collected during those years were not refunded. The students enrolled during those years received nothing of value. How much of that damage was preventable, and at what point did the regulatory intelligence available to ASQA indicate that action was warranted?

This is not an attack on ASQA's integrity. ASQA is operating with the tools, powers, and resources it has been given. The question is whether those tools, powers, and resources are adequate to the size and sophistication of the problem. An enforcement model that catches fraud after thousands of qualifications have been issued is not fit for the current threat environment. The two hundred providers under investigation are in the system right now. Some of them may be enrolling students right now. Those students may receive worthless credentials before any cancellation action is completed. That is the gap the current model does not close.

What Must Happen Now, and What Must Stop

The government must fund a dedicated, multilingual, properly resourced student support service for every person holding a cancelled qualification. Not a FAQ page. Not a referral to their new RTO. A service that provides free, accessible, expert guidance on their options, their rights, and their pathway back into legitimate training, with funded re-

enrolment pathways for those who cannot afford to pay again for a qualification they already paid for once.

ASQA must move immediately from passive website notification to direct, individual communication with every affected student using the contact and USI data already held in the national system. Every person whose qualification has been cancelled must receive a plain-language letter in the language they are most likely to understand, explaining what happened, confirming they are not at fault, and outlining their options in concrete terms.

Employers in construction, aged care, childcare, security, health, and every other regulated and licensed sector must receive specific, written guidance from ASQA and the relevant state and territory regulators on their obligations, protections, and pathways. "Seek legal advice" is not guidance. It is a cost imposed on an innocent party.

The government must publicly commit to a forensic review of the funding and regulatory settings that made this possible at scale: the funding incentives that rewarded enrolment over outcomes, the audit cycle frequency and methodology that failed to detect systematic non-compliance before it affected tens of thousands of students, and the provider entry and monitoring requirements that allowed under-resourced and bad-faith operators to establish, enrol, and issue at volume before intervention arrived.

And the sector must be honest. Honest about the fact that many people within the VET industry knew non-genuine RPL was widespread long before ASQA's cancellation program began. Honest about the fact that the race to the bottom in course fees and duration was visible and documented for years. Honest about the fact that the people most harmed are among the most vulnerable in Australia, migrants, international students, low-income workers, people with limited English, people under visa pressure, people who trusted a system that was supposed to protect them and demonstrably did not.

Forty-five thousand qualifications and certificates cancelled. Over fifteen providers cancelled, seventeen regulatory actions. Two hundred under investigation. The number that matters most is the one that does not yet have a figure attached to it: how many more students will be harmed before the investigation of the remaining two hundred providers is complete, and what is being done right now to stop the enrolments that may be happening today.

That is the question this sector owes an answer to.

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Masthead

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