

Skills First Program
2021 Audit and Assurance Report

Business Process and Transactional Compliance Audit

Central Highlands Group Training Inc
3683

Version	Final
Auditor	RSM
Date report issued	26 May 2022
Training Provider Contract	2021 Standard VET Funding Contract
Circulation	Department of Education and Training Graham McMahon, CEO, Central Highlands Group Training Inc

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1. Executive Summary

1.1 Introduction

The *Skills First* Program is an entitlement to government subsidised training for Eligible Individuals.

The Victorian Department of Education and Training (the Department) contracts Training Providers to deliver training to Eligible Individuals under the *Skills First* Program. In accordance with its *Skills First* Audit and Review Strategy, the Department undertakes assurance activity to ensure the contracted Training Providers are complying with the terms and conditions of their VET Funding Contract (the Contract).

The objectives of the *Skills First* Audit and Review Strategy are to:

- confirm that funding has been expended appropriately
- promote training provider regulatory and standards compliance and
- promote training provider process quality.

This audit report includes exceptions-based reporting and has been produced by an externally contracted panel of audit service providers.

This audit examined a sample of data that had been reported Central Highlands Group Training Inc ('BGT') to the Skills Victoria Training System (SVTS).

1.2 Overview of the Training Provider *(as provided by the Training Provider)*

Overview / Mission Statement

BGT is a small not for profit RTO that is committed to providing people with employment opportunities and to reach their full potential. The aim is to provide employers with highly skilled staff and to support students in gaining their qualification for lifelong career success. BGT is a small organisation that offers personalised and flexible options for its students.

Our target market is split into two areas, the first being school leavers and youth in traineeships and apprenticeships. The second target market is mature aged learners looking to upskill or reskill.

BGT delivers training within the following areas in a classroom based format – Disability, Individual Support and Education Support, Business and engineering via a traineeship/apprentice model. All areas of training are within areas that are in high demand in the region. BGT regularly receive feedback from students and employers that its method of workplace based training and classroom delivery is flexible and that the students feel supported, engaged and are less intimidated being a small group environment or one on one training. BGT endeavour to provide a course structure that fits with industry need for classroom based students and is designed specifically to a business trainees job role and the needs of the particular workplace they are working within.

1.3 Objective and Scope of the Audit

Central Highlands Group Training Inc ('BGT') was provided with all sample data records on 21 April 2022 at 9:57am.

BGT was provided until 5:00pm 26 April 2022 (25 April 2022 was a public holiday, hence the audit did not commence on this date) to provide all requested information. BGT did not produce all documents by the specified timeframe. Concession documentation for two samples was uploaded after the above timeframe expired. The documents were produced on 27 April 2022 at 7:58am.

RSM conducted the audit remotely which commenced on 26 April 2022 and concluded on 10 May 2022.

Entry Meeting	Date: 26 April 2022	Time: 11:00am
BGT Attendees	1 Graham McMahon (CEO), 2 Emily Molloy (Training Manager), 3 Katie Clayton (Regulation and Compliance Office)	
RSM Attendees	1 Jessica Simpson (Consultant), 2 Brianna Baird (Consultant)	

The objective of the audit was to consider the business processes and internal control environment employed by the Training Provider to comply with its contractual obligations under the Contract.

The scope of work was to:

- gain a contextual understanding of the Training Provider to set the scene for the audit
- examine internal audit activity undertaken by the Training Provider to self-assess its compliance against the Contract
- examine processes in place for eligibility assessment, fees and fee concessions, pre-training review, training plan development, training participation
- gain a contextual understanding of the provision of quality training services delivered by the Training Provider under Skills First, including the Quality Charter
- conduct student and Skills First Teacher interviews to validate audit findings, including verification of funding claimed and
- examine maintenance of records to evidence compliance (e.g. eligibility, pre-training review, fee concession, training plans, Evidence of Participation), including use of the Training Provider's Student Management System (SMS) and input of relevant data into the SVTS.

The following procedures were performed:

- obtained a sample of program and/or subject enrolments, as reported by the Training Provider via the SVTS, provided by the Department
- held an entry meeting with the Training Provider's CEO or authorised delegate
- obtained documentation/materials from the Training Provider for each student/subject in the sample
- provided the Training Provider with the opportunity to present available documentation/materials for each sample
- identified whether the documentation/materials provided by the Training Provider met the requirements of the Contract, as applicable
- considered the information provided by the Training Provider in identifying the factual findings in this report
- held an Exit Interview with the Training Provider's CEO or authorised delegate to discuss the findings, develop a Management Action Plan, and provide the Training Provider with the final list of exceptions and
- requested management comments and incorporated these into the final report as appropriate.

1.3 Objective and Scope of the Audit (Cont.)

Transactional compliance testing was also performed to identify specific areas of non-compliance with the Contract through sample testing of records associated with student eligibility, pre-training review, training plans, training participation, fee concessions and data reporting.

Conclusion of fieldwork

At the conclusion of the audit fieldwork on 4 May 2022 at 3:00pm, a Close-Out meeting was held to discuss the possible exceptions and ascertain if further evidence may be available to support the items noted as an exception. The Training Provider was granted 24 hours to locate and provide the documents not provided at the time of the fieldwork.

BGT did not produce all of the misplaced documents by the above specified timeframe. The misplaced documents which were able to be provided by the RTO were produced on 5 May 2022 at 1:30pm.

Where sample testing issues and corresponding root causes have been identified, the results have been incorporated into the findings set out in Section 1.5, Section 3 and the Appendices of this report (as relevant).

An assessment of a prior audit's Management Action Plan was undertaken as part of this audit and the current status is reported in Section 5 of this report.

Close-out Meeting		In Person:	<input type="checkbox"/>	Date:	4/05/2022
		Via Phone:	<input checked="" type="checkbox"/>	Time:	3:00pm
BGT Attendees	1 Emily Molloy (Training Manager), 2 Katie Clayton (Regulation and Compliance Office)				
RSM Attendees	1 Jessica Simpson (Consultant), 2 Brianna Baird (Consultant)				

1.4 Business Model and Operating Environment

BGT 3683 is based in Ballarat with one campus located in Ballarat, Victoria. Student records are retained in a combination of electronic and hard copy at the Ballarat locations.

BGT management advised that as of 26 April 2022, they are training approximately 300-400 *Skills First* funded students. The primary modes for training delivery are Trainee based, face to face and online training.

BGT has not added programs to their Registered Scope in the last 12 months.

Trends or changes in BGT's business model over the past five years involved consistent number of training locations, no changes to the Training Provider's scope and steady government funding.

BGT employs the following marketing practices: social media, Training Provider's website, Job Fairs, secondary school relationships, word of mouth.

Most students are recruited through word of mouth.

Brokering Services are not subcontracted out.

Training and assessment services are not subcontracted out.

Training Services not related to training and assessment (for example, administrative services) are not subcontracted out.

BGT was most recently audited by VRQA in August 2019. BGT has published the results of this audit on their website. BGT did receive a rectification plan as a result of this audit, which has been completed.

1.5 Summary of Findings

The following control weaknesses were identified which may impact the Training Provider's ability to comply with the Contract:

Report Ref	Area	Control Weakness
3.1	Eligibility	Student was ineligible
3.2	Eligibility	Eligibility Form was inaccurate / incomplete
3.3	Eligibility	Eligibility Form dated more than one year prior to enrolment
3.4	Pre-Training Review	Pre-Training Review ('PTR') not provided
3.5	Pre-Training Review	PTR did not meet contractual requirements
3.6	Training Plan	Apprentice / Trainee Monthly Contacts not provided
3.7	Training Plan	Unable to align Training Plan and Training & Assessment Strategy ('TAS')
3.8	Training Plan	Training Plan did not meet contractual requirements
3.9	Training Plan	Training Plan did not align to SVTS data
3.10	Evidence of Participation	Evidence of Participation ('EOP') not provided
3.11	Evidence of Participation	Invalid EOP
3.12	Evidence of Participation	EOP not dated within 30 days of Activity End Date ('AED')
3.13	Fee Concessions	Unable to sight when concession entitlement was sighted by Training Provider
3.14	Fee Concessions	Inaccurate SVTS data
3.15	Fee Concessions	Invalid concession entitlement
3.16	Fee Concessions	Concession entitlement sighted after program commencement
3.17	Fees	Statement of Fees ('SoF') did not meet contractual requirements

Further details of the control weakness, and a Management Action Plan to address them, are included in Sections 3 and 4 of this report.

1.5 Summary of Findings (Cont.)

The status of prior audit findings, based on the Management Action Plan developed as a result of BPA/TCA audit of BGT (report dated 16 March 2021), has been assessed and the current implementation status is below:

Report Ref	Area	Current status
5.1	Eligibility	In progress.
5.2	Pre-Training Review	In progress. Noted this previous Finding relates to Finding 3.4.
5.3	Pre-Training Review	In progress.
5.4	Pre-Training Review	In progress. Noted this previous Finding relates to Finding 3.5.
5.5	Training Plan	In progress. Noted this previous Finding relates to Finding 3.7.
5.6	Training Plan	In progress.
5.7	Training Plan	In progress.
5.8	Training Plan	In progress. Noted this previous Finding relates to Finding 3.9.
5.9	Evidence of Participation	In progress. Noted this previous Finding relates to Finding 3.11.
5.10	Evidence of Participation	In progress.
5.11	Fee Concessions	In progress. Noted this previous Finding relates to Finding 3.16.
5.12	Fees	In progress.

Implementation status of the previous MAP is currently in progress. BGT advised, due to changes in key staff (i.e. Administration staff, Compliance Officer, Training Manager, etc.) in the past 12 months the implementation of the previous MAP is still ongoing.

Status Definitions

Completed: the Training Provider has provided evidence that the Management Action Plan to address this finding has been implemented

In Progress: the Training Provider has provided evidence that progress has been made in the implementation of the Management Action Plan to address this finding, but all elements of the Management Action Plan have not been fully implemented, and/or actions may be evident to ascertain rectification occurred, however findings of a similar nature were identified in this audit/review.

Not started: the Training Provider has not provided any evidence that they have begun to implement the Management Action Plan.

Out of Scope: some key aspects from a Quality Review are out of scope as they are not assessed in a BPA/TCA – these include Assessment Resources, Methods & Timing/Practical Placements/Training Verification

Further details of the status of prior audit findings are included in Section 5 of this report.

1.6 Training Services Observations

Organisation Level

The following topics and their alignment to contractual requirements were discussed with the Training Provider and/or applicable documents/evidence were sighted:

Topic	Discussed?	Is there a documented ¹ process?	Observations
Student attraction activities, including marketing and advertising, in relation to any aspect of this Contract in accordance with Clause 1 of Schedule 1.	Y	Y	BGT has developed an Advertising Policy and Marketing Policy, which consists of the approval process for marketing materials.
Information provided to prospective students about program offerings, fees, support and the impact on the individual's Entitlement to Funded Training in accordance with Clauses 4.8 and 5 of Schedule 1, in addition to collecting and maintaining required evidence.	Y	Y	Information for prospective students is retained within the Training Provider's website and Student Handbook. Prospective students are also able to contact BGT staff via telephone or email for further information.
The conduct of and documented business processes for testing an individual's eligibility for training subsidised through the <i>Skills First</i> Program and any relevant concession or exemption/waiver of tuition fees in accordance with Clauses 2, 3 and 5 of Schedule 1 and the <i>Guidelines About Eligibility</i> .	Y	Y	BGT has developed the Enrolment Policy and Pre-Training Review & Enrolment Policy to document the process for determining student eligibility. Additionally, BGT has implemented Eligibility Form and Enrolment Form templates to ensure all relevant information is documented and retained.
The conduct of and documented business processes for Pre-Training Reviews , in accordance with Clause 4 of Schedule 1.	Y	Y	BGT has developed the Pre-Training Review Policy and Pre-Training Review & Enrolment Policy to outline the pre-training review procedures.
The conduct of enrolment processes required including in accordance with Clause 4 of Schedule 1.	Y	Y	BGT has developed the Enrolment Policy and Pre-Training Review & Enrolment Policy to outline the procedures to be followed for enrolment. The RTO Administration Manual also documents the enrolment processes and enrolment packs utilised by BGT staff.
The business process and documentation of Training Plans in accordance with Clause 7 of Schedule 1.	Y	Y	BGT has developed the Training Plan Policy to outline the information required in the TAS and the process of the development of Training Plans for the students (i.e. trainees and non-trainees).
Levying of fees, including applying any concessions, exemptions or waivers, including in accordance with Clause 5 of Schedule 1, in addition to collecting and maintaining required evidence.	Y	Y	BGT has developed the RTO Administration Manual which outlines the process of developing the Statement of Fees and input of concession information. Fees and payment options are also included in the Student Handbook and on the Training Provider's website.
Reporting and verification of data and other information to the Department including in accordance with Clause 10 of Schedule 1.	Y	Y	Data will be reported and verified weekly, and the data will be uploaded monthly using VETtrak. Detailed procedures have been outlined within the RTO Administration Manual.

¹ While contractually a documented business process is not required for all topics, it may be deemed an opportunity for improvement. If a documented business process is not in place, observation to include details on how this information is communicated to staff.

1.6 Training Services Observations (Cont.)

Topic	Discussed?	Is there a documented ² process?	Observations
Provision of support to Eligible Individuals.	Y	Y	BGT has developed the Student Safety & Security Policy, Student Health Issues Policy, Employee Handbook and Individualised learning Strategies Policy to capture the support provided to students. BGT has included Student Support Services (internal and external) within the Student Handbook where a list of supports available for the students is outlined.
Strategies for industry engagement and how the outcomes of which are systematically used to ensure the industry relevance of its assessment practices and resources.	Y	N	BGT's trainers / assessors work part-time within industry and provide BGT with current and up to date knowledge in industry. Noted this is not within a documented procedure.
Complaints and appeals process.	Y	Y	BGT has included the Complaints and Appeals Policy and Procedure on their website as well as included in the student and employee handbooks.
Staff professional development, including how <i>Skills First</i> Teachers and other relevant staff are made aware of and comply with contractual requirements.	Y	Y	BGT has developed the Professional Development Policy and Procedure to document the processes and requirements of trainers with regards to professional development. Trainer Matrixes are also implemented for all trainers to acknowledge and document all professional development activities undertaken by each trainer. Contractual requirements are made aware through initial staff training. Any relevant updates are communicated to staff via weekly RTO Meetings.
Segregation of Duties.	Y	Y	BGT has developed position descriptions for the Training Manager, Admin Officer, trainers / assessors, etc. which include compliance with funding contracts. BGT also has an Instrument of Delegations and Delegation of Authority Policy in place to ensure a segregation of duties.
Controls and Systems, in accordance with Clause 4.9 f), for:			
Training Participation	Y	Y	The Evidence of Participation Policy and the Withdrawal Policy outline matters regarding training participation which includes requirements of a valid EOP and overview of withdrawal process. The withdrawal process has also been included in the student handbook.
Fee Concessions	Y	Y	BGT has developed the RTO Administration Manual which outlines the process of developing the Statement of Fees and input of concession information. Fees and payment options are also included in the Student Handbook and on the Training Provider's website.
Fees	Y	Y	As above.

² While contractually a documented business process is not required for all topics, it may be deemed an opportunity for improvement. If a documented business process is not in place, observation to include details on how this information is communicated to staff.

1.6 Training Services Observations (Cont.)

The Department issued Internal Audit Checklist (IAC) was last completed in September 2020. The Training Provider did attach or embed evidence to support their own assessment of compliance for the relevant contract clause/s. The Training Provider noted non-compliances with:

- Clause 4.4 – General Obligations
- Clauses 7.4 – 7.6 Change in Control
- Clause 7.7 – 7.11 Notification of Events
- Clause 10.6 Accounting and Record Keeping Obligations
- Schedule 1 Clauses 5.8 – 5.12 Training and Assessment
- Schedule 1 Clauses 11.1 – 11.7 Evidence of Participation
- Schedule 1 5.1 – 5.6 Pre-Training Review
- Schedule 1 Clause 8 Apprenticeship/Traineeship Training Delivery Requirements and
- Schedule 1 Clauses 2.1 – 2.5 and 2.8 Skills First Program- Eligibility Criteria.

A subsequent rectification plan was developed and was completed.

Where a non-compliance is noted in the BPA, the finding has been cross-checked against the most recent IAC to ascertain the accuracy in the self-assessment for the relevant control area/s. The Training Provider did identify any non-compliances in the IAC that are relevant to the exceptions identified in this audit. Discrepancies between the BPA finding and the IAC self-assessment will be noted in the Detailed Findings section of this report.

Sampled Program

Name of the Program being tested		Certificate III in Business (BSB30120)			
Where is the program delivered? e.g. a classroom, simulated warehouse environment etc.		Combination of online (LMS) and on the job training within the workplace			
No. of and cohort type of the Training and Assessment Strategies (TAS) applicable for the program		<p>The target learner cohort is:</p> <ul style="list-style-type: none"> - Trainees currently employed under a training contract and referred by their employer. - Are currently working in the Business Services sector but do not hold any formal qualifications and are seeking to obtain accreditation. - Hold workplace experience in similar or related industries (e.g. administration/customer service based roles). <p>Characteristics of the learner cohort are individuals with:</p> <ul style="list-style-type: none"> - A clear purpose and motive for undertaking the training. - Career goals and objectives that align with the outcomes of the training. - The availability and capacity to undertake training to obtain the qualification - Be located in the Ballarat area. - Be committed to undertaking training as per training contract set by the training provider, student and employer. 			
Date TAS last updated		22/12/2020			
Duration of program as noted in TAS		12 months			
Does the duration align to AQF minimum recommended duration?		Yes			
If no, insert the justification for shorter time period as documented in the TAS (or else, state 'Not documented').		Not applicable			
In TAS?	Subjects	Scheduled hours	Delivery Modes	Assessment Methods	SF Teacher responsible for delivery/assessment
Y/N	Y	Y	Y	Y	Y

1.6 Training Services Observations (Cont.)

The Training Provider has maintained sufficient records to determine which Skills First Teacher was responsible for delivering each subject in the sampled program and sufficient evidence of vocational competency, industry currency and professional development is retained.

The information provided to students on the Statement of Fees is consistent with the information in the TAS.

The *Skills First* Teacher(s) delivering Certificate III in Business has qualifications as shown in the table below:

<i>Skills First</i> Teacher Name	Qualification/s Held	Date Qualification Obtained	Relevant Industry Experience? Y/N
Denise Wren	BSB40215 Certificate IV in Business	16/06/2017	Y

1.7 Tuition Fees Observations

As requested by the Department, we reviewed tuition fees and have determined the following:

- The Training Provider's website did publish the standard fees for government subsidised training in a prominent place.
- For the two (2) BPA students the following was noted:
 - In one (1) instance, the Statement of Fees did not include all information stipulated in the Guidelines about Fees.
 - In one (1) instance, there was evidence to support a Fee Exemption granted (where applicable).

1.8 Summary of Student and *Skills First* Teacher Interviews

As requested by the Department, we attempted interviews with a sample of six (6) students enrolled in government subsidised training.

- One (1) student could not be contacted after three attempts.
- Five (5) student interviews were completed.

The outcome of the completed student interviews is outlined below and is based on information provided by the student only.

- For three (3) students the information obtained from the student interview was consistent with the data reported to SVTS.
- For two (2) students, inconsistencies were noted across the following aspects: Enrolment and Eligibility and Pre-Training Review.

As requested by the Department, we attempted interviews with four (4) *Skills First* Teachers who deliver training for the Training Provider. The outcome of the *Skills First* Teacher interviews is outlined below:

- Four (4) *Skills First* Teacher interviews were completed and no issues were noted.

Please note, management comments relating to student/Teacher interviews are not required. Interview responses of concern will be raised by the Department in the outcome letter.

2. Root Cause Analysis – BPA sampled students only

The below table outlines the number of exceptions from the student files reviewed as part of the BPA, based on the business component root cause of each finding.

	Business Policies	Business Processes	People & Organisation	Management Oversight	Systems & Data
Eligibility	0	2	3	0	0
Pre-Training Review	1	0	0	0	0
Training Plan	0	0	11	23	0
Training Participation	1	0	0	0	7
Fee Concessions	0	0	0	0	0
Fees	0	1	0	0	0
Total Errors	2	3	14	23	7
Root Cause Error Rate³ %	4.08%	6.12%	28.57%	46.94%	14.29%

The root causes of each instance of non-compliance based on the below descriptions.

Root Cause	Deficiency Description
Business Policies	Business policies and procedural documentation does not include specific guidelines, articulate relevant strategies, authorities, responsibilities or expected standards of conduct.
Business Processes	Business processes, methods and/or templates are non-existent or do not align to the requirements of the Contract
People and Organisation	Staff have not consistently applied their knowledge and experience and/or insufficient training been provided to perform the process in accordance with the Contract requirements.
Management Oversight	Management oversight and internal review processes and controls are inadequate to identify and rectify any non-compliances.
Systems and Data	Information systems do not support compliance with the Contract and/or do not produce accurate data for submission through SVTS.

³ The Root Cause Error Rate is based on the number of exceptions for each root cause, as a percentage of the total exceptions across all five business components.

3. Detailed Findings

The table below details the non-compliances identified and the Training Provider comments on the findings:

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		
<p>3.1 Student was ineligible</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified one (1) instance where the student does not meet the upskilling requirement. Specifically, the student had previously completed a Certificate III in Transport and Logistics and was enrolling in a Certificate III in Engineering - Fabrication Trade.</p> <p>The Training Provider did identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix A for further information.</p> <p>Root Cause(s) People and Organisation</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 2.4 - An individual who is 20 years of age or older (as at 1 January in the year of commencement of training) is eligible to enrol in Skills First subsidised training in: a) a program that is at a higher AQF level than the highest qualification held at the time of the scheduled commencement of training ('upskilling')</p>	<p>Previous lack of training, and internal system of checks and balanced identified.</p> <p>Lack of clarity of policy and procedure and accompanying resources.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		
<p>3.2 Eligibility Form was inaccurate / incomplete</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified three (3) instances where the Eligibility Form was inaccurate. Specifically, the following were noted:</p> <p>a) One (1) instance where the Eligibility Form declared an Australian Birth Certificate had been sighted. However, only a Medicare card was sighted within the provided documents;</p> <p>b) One (1) instance where the student indicated the answer to the 2x2x2 rule 'same level at a lifetime' question as 'not applicable'. This answer is relevant if the student had enrolled in a Foundation Skills list program. This was not the circumstance for this student. Noted the Enrolment Form stated the same answer of 'not applicable'; and</p> <p>c) One (1) instance where SVTS states an eligibility exemption was granted. However, the Eligibility Form stated no exemption was granted. Management advised an exemption was granted in error.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix A for further information.</p> <p>Root Cause(s) Business Process</p>	<p>a) Lack of training, lack of employee cross checking documentation completed by applicant. Lack of check and balances built into policies and procedures.</p> <p>b) Lack of training and/or understanding of eligibility criteria, lack of employee checking documentation completed by applicant.</p> <p>c) Error in completing documentation, lack of internal audit or processes of checks and balances to ensure data integrity.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		
<p>3.2 Eligibility Form was inaccurate / incomplete (Cont.)</p>	<p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 2.1 - The eligibility criteria and requirements set out in this Clause 2 must be read in conjunction with the Guidelines About Eligibility. In particular, these Guidelines set out which forms of Evidence of Eligibility are accepted by the Department and provide information about how to apply the eligibility requirements in particular circumstances. Clause 10.1a) The Training Provider must submit accurate Student Statistical Reports to the Department via the SVTS at least once every calendar month per data collection year;</p> <p><u>2021 Guidelines About Eligibility</u> Clause 1.1 - The Training Provider must assess a student’s eligibility against the requirements outlined in this Section 1. Clause 1.2 - Citizenship/residency - A student must be either: a) an Australian citizen; b) a holder of a permanent visa; or c) a New Zealand citizen, as evidenced by one of the documents described in the Evidence of Eligibility and Student Declaration form at Attachment 1 to these Guidelines. Clause 2.2 - Prior to the commencement of training, for each student who is assessed to be eligible, the Training Provider must complete the information and declarations in the Evidence of Eligibility and Student Declaration form at Attachment 1 to these Guidelines.</p>	<p>As above.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		
<p>3.3 Eligibility Form dated more than one year prior to enrolment</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified two (2) instances where we were unable to verify that information is current / up to date. Specifically, the following were noted:</p> <p>a) One (1) instance where the Student Declaration (17/08/2020) was dated one year prior to the Training Provider Declaration (17/08/2021). Management advised the date populated by the student was inaccurate; and</p> <p>b) One (1) instance where the date of eligibility assessment was completed on 17/06/2019. However, the enrolment date was 19/11/2021 (889 days before). Management advised the program was superseded. Originally, the student commenced on 18/06/2019 in BSB42015 and was transitioned into BSB42020 on 19/11/2021.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix A for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 3.1 - The Training Provider must determine whether an individual is eligible to receive their Skills First Entitlement before their commencement in training.</p>	<p>a) Student dating error, as student was signed up in a specific employer cohort. – lack of employee attention to detail and lack of checks and balances written into policies and procedures in all documentation completed by applicants.</p> <p>b) Unclear understanding of transition requirements by staff, unclear, unclear policies and lack of training of Student Management System to ensure accurate data entry for SVTS uploads.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Pre-Training Review		
<p>3.4 Unable to sight PTR</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified five (5) instances where a Pre-Training Review ('PTR') as not provided.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix B for further information.</p> <p>Root Cause(s) Business Policy</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 4.1 - The Training Provider must conduct a Pre-Training Review for each prospective Skills First Student, as part of enrolment, or before the commencement of training, to ascertain a suitable, and the most suitable, program for that individual to enrol in.</p>	<p>Previous employee lack of performance and adherence to requirements, in relation to submission and accurate record keeping of documentation.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Pre-Training Review		
<p>3.5 PTR did not meet contractual requirements</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified two (2) instances where the PTR did not meet the contractual requirements. Specifically, the following were noted:</p> <p>a) One (1) instance where we were unable to sight the student's answers to relevant questions (i.e. questions relating to objectives, previous competencies and appropriate materials). This PTR was completed electronically. In these instances, we were able to sight every potential multiple-choice answer instead of the one selected by the student; and</p> <p>b) One (1) instance where the 'Office Use Only' section in a hard-copy PTR had not been populated to acknowledge the suitability of the program. Hence, we were unable to determine that the PTR had been assessed by the Training Provider prior to program commencement.</p> <p>The Training Provider did identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix B for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 4.1 - The Training Provider must conduct a Pre-Training Review for each prospective Skills First Student, as part of enrolment, or before the commencement of training, to ascertain a suitable, and the most suitable, program for that individual to enrol in.</p>	<p>a) Need to communicate with provider to ensure that accurate and complete records can be downloaded in a timely and compliant manner.</p> <p>b) Lack of employee understanding of the requirements to complete an accurate and compliant PTR. PTR that was utilised at the time was not clearly laid out.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Pre-Training Review		
<p>3.5 PTR did not meet contractual requirements (Cont.)</p>	<p>Contract Reference (Cont.) <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 4.3 - The Pre-Training Review must: a) identify the individual's objectives for training and the likely job or further study outcomes from the development of new competencies and skills; b) identify any competencies previously acquired (including through RPL, recognition of current competency (RCC) or credit transfer); d) identify whether the proposed learning strategies (including online delivery) and materials are appropriate for that individual and, where necessary, steps to overcome any barriers.</p>	<p>As above.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Training Plan		
<p>3.6 Apprentice / Trainee Monthly Contacts not provided</p>	<p>Testing of two (2) BPA and twelve (12) TCA student files identified thirteen (13) instances where the evidence of Apprentice / Trainee monthly contacts was not provided.</p> <p>Management advised at the Close-Out that there are monthly contacts maintained by trainers, however these do not meet the contractual requirements. This information was not provided during the audit fieldwork.</p> <p>The Training Provider did identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix C for further information.</p> <p>Root Cause(s) Business Process</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 7.5 - If any additional requirements in Regulatory Standards or other Laws apply to specific programs or types of training on the Funded Scope, the Training Provider must comply with those requirements, including: a) for training delivered to Apprentices/Trainees, the requirements of the Act and the Guidelines About Apprenticeship/Traineeship Training Delivery; and</p>	<p>Trainers identified that in many instances they did make ongoing contact, there are notes in their calendar to demonstrate this, or file notes kept by the trainers.</p> <p>The accuracy of these notes and calendar entries did not meet contractual requirement. There were not clear policies and procedures in place for this at the time (there is now implemented May 2022) and training did not take place with trainers regarding this (will be taking place Wednesday 11TH May 2022).</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Training Plan		
<p>3.6 Apprentice / Trainee Monthly Contacts not provided (Cont.)</p>	<p>Contract Reference (Cont.) <u>2022 Guidelines About Apprenticeship/Traineeship Training Delivery</u> Clause 4.7 - The Training Provider must make monthly contact by either e-mail or phone with both the Apprentice or Trainee and the workplace supervisor to: a) monitor and document the progress of training against the Training Plan; b) monitor and document the training/learning activities undertaken during the withdrawal time for the previous month; and c) document the dates and time periods logged as withdrawal time in the previous month</p>	<p>As above.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<p>Training Plan</p>		
<p>3.7 Unable to align Training Plan and Training & Assessment Strategy</p>	<p>Testing of two (2) BPA and twelve (12) TCA student files identified thirty-two (32) instances where we were unable to align the Training Plan to the relevant Training & Assessment Strategy ('TAS'). Specifically, the following were noted:</p> <ul style="list-style-type: none"> a) Twenty-two (22) instances where we were unable to align assessment methods between the Training Plan and relevant TAS; and b) Ten (10) instances where we were unable to sight a subject ID within the relevant TAS. <p>The Training Provider did identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix C for further information.</p> <p>Root Cause(s) Management Oversight</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 7.2 - The Training Provider must ensure that all training and assessment in programs on the Funded Scope is delivered in accordance with the relevant Training Plan and Training and Assessment Strategy.</p>	<p>TAS has not been reviewed. Inexperienced employees who were identified as non-performing are no longer with the organisation.</p> <p>It was identified by the aforementioned employees in the previous audit however it was not rectified.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Training Plan		
<p>3.8 Training Plan did not meet contractual requirements</p>	<p>Testing of two (2) BPA and twelve (12) TCA student files identified one (1) instance where we were unable to sight subject specific assessment methods within the Training Plan.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix C for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 6.18i) - The Training Plan for an Apprentice/Trainee must include the assessment method(s) for each subject;</p>	<p>Lack of crosschecking by employee prior to disseminating the training plan.</p> <p>Lack of knowledge to set up the package correctly in student management system to populate these areas.</p> <p>Lack of policies and procedures as well as resources in place to guide employees in compliance of paperwork.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<p>Training Plan</p>		
<p>3.9 Training Plan did not align to SVTS data</p>	<p>Testing of two (2) BPA and twelve (12) TCA student files identified nineteen (19) instances where we were unable to align the Activity Start Date ('ASD') and Activity End Date ('AED') between the Training Plan and SVTS data.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix C for further information.</p> <p>Root Cause(s) People and Organisation</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 10.1a) The Training Provider must submit accurate Student Statistical Reports to the Department via the SVTS at least once every calendar month per data collection year;</p>	<p>Undertrained and underperforming employees that were not supported in training.</p> <p>Lack of spot checks and auditing built into policies and procedures.</p> <p>Responsible parties no longer work for the organisation.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Evidence of Participation		
<p>3.10 Evidence of Participation not provided</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified four (4) instances where we were unable to sight a first point of Evidence of Participation ('EOP').</p> <p>The Training Provider did identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix D for further information.</p> <p>Root Cause(s) Business Policy</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 9.6 - The number of points of Evidence of Participation that must be documented and maintained for each subject is as follows: b) if the period between the Activity Start Date and Activity End Date for the subject is more than 30 days. Two points of Evidence of Participation per subject must be provided in compliance with the following conditions: i) one point must be no later than 30 days after (and no earlier than) the reported Activity Start Date; ii) one point must be no earlier than 30 days before (and no later than) the reported Activity End Date;</p>	<p>There were not clear policies and procedures in place for this at the time (this is now implemented May 2022) and training did not take place with trainers regarding this (will be taking place Wednesday 11TH May 2022).</p> <p>Evidence that trainers rely on to show progression do not meet requirements and are therefore invalid.</p> <p>This was identified in the previous audit by individuals that are no longer with the organisation and a rectification plan was not put in place prior to departure.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<p>Evidence of Participation</p>		
<p>3.11 Invalid EOP</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified eleven (11) instances where the EOP did not meet contractual requirements. Specifically, the following were noted:</p> <p>a) Ten (10) instances where Evidence of Work Submitted did not include a date of submission; and</p> <p>b) One (1) instance where Login & Engagement did not include the student’s name / ID, evidence of continuous engagement (only able to see one action on ASD).</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix D for further information.</p> <p>Root Cause(s) Systems & Data</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 9.7 - The only items of Evidence of Participation the Department accepts are:</p> <p>a) evidence of work submitted by the Skills First Student relating to engagement in the subject. This must be the work itself, or a copy if this is not possible. If the information required under Clause 9.4 of this Schedule 1 (student name or client identifier, a subject identifier and a date expressed in day/month/year format) cannot be recorded on the work itself, separate evidence must be provided to link the work to the Skills First Student, the subject and date it was completed. For example, a delivery schedule (timetable, lesson plan or equivalent) detailing how the piece of work covers the subject in question, including due dates and milestones for completion of the work.</p>	<p>a) staff that were hosting the audit are new to the organisation and new to navigating catapult and may not have pulled the correct reports, or the full reports – All this information can be viewed in the electronic system.</p> <p>b) staff that were hosting the audit are new to the organisation and new to navigating catapult and may not have pulled the correct reports.</p> <p>No clear policy and procedure in place, no system support in place. - All this information can be viewed in the electronic system</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Evidence of Participation		
<p>3.11 Invalid EOP (Cont.)</p>	<p>Contract Reference (Cont.) <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 9.7 - The only items of Evidence of Participation the Department accepts are: e) secure login to an online learning management system and evidence of the Skills First Student's engagement with learning and/or assessment activity required for the subject. Where a Skills First Student has a secure login (meaning they are issued a unique user ID and password) to an online learning management system to undertake learning and/or assessment activity for the subject, the Training Provider must have: i) a record of the login ii) evidence that the Training Provider has checked with the student that they are continuing to engage in the subject. A login record indicating the Skills First Student received training materials alone is not sufficient Evidence of Participation. Evidence of engagement with learning and/or assessment activity should also be provided, for example participation in a discussion forum, completion of an online quiz, completion of an online reflection task or similar activities.</p>	<p>As above.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<p>Evidence of Participation</p>		
<p>3.12 Evidence of Participation not dated within 30 days of Activity End Date</p>	<p>Testing of two (2) BPA and twenty (20) TCA student files identified four (4) instances where the EOP provided was not dated within 30 days of AED. Hence, we were unable to verify the student’s participation for the subject duration.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix D for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 9.6 - The number of points of Evidence of Participation that must be documented and maintained for each subject is as follows: b) if the period between the Activity Start Date and Activity End Date for the subject is more than 30 days. Two points of Evidence of Participation per subject must be provided in compliance with the following conditions: i) one point must be no later than 30 days after (and no earlier than) the reported Activity Start Date; ii) one point must be no earlier than 30 days before (and no later than) the reported Activity End Date;</p>	<p>There were not clear policies and procedures in place for this at the time (there is now implemented May 2022) and training did not take place with trainers regarding this (will be taking place Wednesday 11TH May 2022)</p> <p>Evidence that trainers rely on to show progression do not meet requirements and are therefore invalid.</p> <p>This was identified in the previous audit by individuals that are no longer with the organisation and a rectification plan was not put in place prior to departure.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Fee Concessions	<p>3.13 Unable to sight date Evidence of Concession was checked</p> <p>Testing of two (2) BPA and seventy seven (77) TCA Concession student files identified four (4) instances where we were unable to verify when the students' concession entitlement was checked by the Training Provider.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix E for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Statement of Fees means a document for each Skills First Student that sets out fee and other information required by the National RTO Standards and the Guidelines about Fees.</p> <p><u>2021 Guidelines About Fees</u> Clause 3.3 - The Training Provider must check a student's entitlement for a Fee Concession as part of enrolment and prior to the commencement of training.</p>	<p>Lack of training of employees on sighting and retention requirements.</p> <p>Policies and procedures from the organisation are vague and are in the process of being reviewed.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<p>Fee Concessions</p>		
<p>3.14 Inaccurate SVTS data</p>	<p>Testing of two (2) BPA and seventy seven (77) TCA Concession student files identified one (1) instance where we were unable to align SVTS to retained concession evidence. SVTS states that the student held a Health Care Card. However, Management advised the student does not hold a concession entitlement. Additionally, the student’s Enrolment Form states the student did not hold a concession entitlement.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix E for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Clause 7.1b) - The Training Provider must provide accurate Student Statistical Reports and other reports or information to the Department about the Training Services, in accordance with Clauses 10 and 11 of Schedule 1;</p>	<p>Data entry error.</p> <p>Lack of attention to detail by employee entering data and checking the data reported by the learner with provided documentation.</p> <p>Lack of internal audits and spot checks in place to ensure data accuracy.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Fee Concessions	<p>3.15 Invalid concession entitlement</p> <p>Testing of two (2) BPA and seven (77) TCA Concession student files identified two (2) instances where we were unable to verify that the students held valid concession entitlements. Specifically, the following were noted:</p> <p>a) One (1) instance where the Training Provider sighted a Health Care Card 18/02/2021. However, the Health Care Card expired (26/09/2020) prior to enrolment (08/02/2021); and</p> <p>b) One (1) instance where we were unable to identify whether HCC or PCC was provided. Student held a digital wallet, however a declaration form was not provided to verify the type of concession entitlement.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix E for further information.</p> <p>Root Cause(s) N/A – TCA exceptions only</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Statement of Fees means a document for each Skills First Student that sets out fee and other information required by the National RTO Standards and the Guidelines about Fees.</p> <p><u>2021 Guidelines About Fees</u> Clause 3.9 - The Training Provider must sight and retain copies of evidence of a student's entitlement to a Fee Concession. Evidence must be kept in a way that enables the Department to confirm the student's Fee Concession entitlement for audit or review purposes and must meet the record keeping requirements set out in Clause 5.3 of these Guidelines.</p>	<p>a) Lack of attention to detail of employee checking ID and enrolment information. Lack of internal audit and checks and balances in place to ensure data integrity. Lack of policy and procedure enforcement.</p> <p>b) Lack of policy and procedure in place and attention to detail. Lack of documentation to accompany verification as a declaration of what was viewed by the employee.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Fee Concessions		
<p>3.16 Concession entitlement sighted after program commencement</p>	<p>Testing of two (2) BPA and seventy (77) TCA Concession student files identified two (2) instances where the student’s concession entitlement was checked by the Training Provider after program commencement.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix E for further information.</p> <p>Root Cause(s) Business Policy</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Statement of Fees means a document for each Skills First Student that sets out fee and other information required by the National RTO Standards and the Guidelines about Fees.</p> <p><u>2021 Guidelines About Fees</u> Clause 3.3 - The Training Provider must check a student’s entitlement for a Fee Concession as part of enrolment and prior to the commencement of training.</p>	<p>Lack of attention to detail of employee checking ID and enrolment information. Lack of internal audit and checks and balances in place to ensure data integrity.</p> <p>Lack of policy and procedure enforcement or direction built into policies and procedures in relation to courses of action, there is no grace period built into the policies and procedures at the time.</p>

3. Detailed Findings (Cont.)

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Fee		
<p>3.17 Statement of Fees did not meet contractual requirements</p>	<p>Testing of two (2) BPA student files identified one (1) instance where we were unable to sight the program code, title & currency as well as approximate government contribution.</p> <p>Management advised that the Statement of Fees ('SoF') provided was not the most up to date version provided to the student. However, the latest SoF was not provided during the audit.</p> <p>The Training Provider did not identify this an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p>Refer to Appendix F for further information.</p> <p>Root Cause(s) Business Process</p> <p>Contract Reference <u>2021 Standard VET Funding Contract - Schedule 1</u> Statement of Fees means a document for each Skills First Student that sets out fee and other information required by the National RTO Standards and the Guidelines about Fees.</p> <p><u>2021 Guidelines About Fees</u> Clause 1.2 - Prior to the commencement of training, the Training Provider must give each Skills First Student a Statement of Fees that includes, at minimum:</p> <ul style="list-style-type: none"> a) the code, title and currency of the program; b) the total cost to them for their program, taking into account any Fee Concession or Fee Waiver entitlement; c) the approximate value of the government contribution expressed in dollars; and d) any other applicable fees, such as student services, amenities, goods or materials. 	<p>Lack of policy and procedures in place and lack of understanding by previous employees (no longer with the organisation) on regulatory compliance requirements.</p> <p>The previous employees did not have in depth knowledge and therefore this would not have been picked up in internal audits due to lack of knowledge and experience.</p>

4. Management Action Plan

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.1	Student was ineligible	People & Organisation	<p>Conduct refresher training for all staff involved in assessing eligibility on the contractual requirements and eligibility guidelines.</p> <p>Consider implementation of an independent review of Eligibility Forms to ensure student eligibility for Skills First funding has been accurately assessed and eligibility exemptions are granted where necessary.</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>New Compliance Officer to undertake review June 2022</p>
4.2	Eligibility Form was inaccurate / incomplete	Business Process	<p>Conduct refresher training for all staff involved in assessing eligibility to ensure all sections of the Eligibility Form are completed in full and accurately.</p> <p>Conduct sample checks of Eligibility Forms to ensure forms have been completed (i.e. residency, 2x2x2 rule, etc.).</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>Ongoing Monthly Spot Checks Commencing May 2022</p>
4.3	Eligibility Form dated more than one year prior to enrolment	N/A	<p>Conduct refresher training for all staff involved in the completion of Eligibility Forms to ensure all required information (i.e. completion dates) is documented within the form template.</p> <p>Consider implementation of an independent review of Eligibility Forms to ensure all required information have been completed accurately and completely.</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>New Compliance Officer to undertake review June 2022</p>
4.4	Pre-Training Review ('PTR') not provided	Business Policy	<p>Update relevant policies and procedures to include a section on the documentation and retention of PTR Forms within all student files.</p> <p>Conduct refresher training for staff involved in the enrolment process to ensure all required documentation is completed and retained.</p> <p>Consider development of an internal Enrolment Checklist including the completion and documentation of PTRs.</p>	Regulation & Compliance Officer and Training Manager	<p>August 2022</p> <p>August 2022</p> <p>August 2022</p>

4. Management Action Plan (Cont.)

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.5	PTR did not meet contractual requirements	N/A	<p>Conduct refresher training for staff involved in conducting PTRs to ensure all required fields have been populated.</p> <p>Moving forward, should all PTR be conducted electronically, consider implementing 5 'mandatory fields' where sections of the PTR must be answered before submission (i.e. student and administration sections).</p>	Regulation & Compliance Officer and Training Manager	<p>August 2022</p> <p>August 2022</p>
4.6	Apprentice / Trainee Monthly Contacts not provided	Business Process	<p>Update / develop a Monthly Trainee / Apprentice Contact Form template to ensure all contractual requirements are met.</p> <p>Ensure all relevant documentation (i.e. Monthly Contacts) are made easily accessible within student files for future reference (i.e. external / internal audits).</p>	Regulation & Compliance Officer and Training Manager	<p>May 2022</p> <p>Policy Reviewed and new Policy Created May 2022</p> <p>Training taking place May 2022</p>
4.7	Unable to align between Training Plan and Training & Assessment Strategy ('TAS')	Management Oversight	<p>Update the Training Plan template and relevant Training and Assessment Strategy to ensure all information align (i.e. assessment methods, etc.).</p> <p>Should any updates be made to either document, ensure controls are in place to update the other document and ensure alignment with SVTS.</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>September 2022</p>
4.8	Training Plan did not meet contractual requirements	N/A	<p>Ensure initial Training Plan provided to student within four weeks of commencement includes all relevant information as contractually required (i.e. assessment methods per subject).</p> <p>Investigate with VETtrack the circumstances for unpopulated sections of the SMS Training Plan (i.e. assessment methods).</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>June 2022</p>

4. Management Action Plan (Cont.)

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.9	Training Plan did not align to SVTS data	People & Organisation	<p>Update the relevant Training Plan Templates to include proposed and actual dates per unit of competency and ensure alignment with data uploaded to SVTS.</p> <p>Consider development of a checklist to ensure each time a subject is completed, the dates are updated to reflect actual dates reported to SVTS.</p> <p>Implement a review process of the SVTS data by an independent reviewer to ensure data entry is accurate.</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>August 2022</p> <p>New Compliance Officer to undertake review September 2022</p>
4.10	Evidence of Participation ('EOP') not provided	Business Policy	<p>Ensure required points of Evidence of Participation are retained and stored within student files in a way which is easily accessible for future reference, where required.</p> <p>Update relevant policies and procedures to include a section on documentation and retainment of points of EOP within all student files.</p> <p>Conduct refresher training for staff involved in the training process to ensure all required documentation is completed and retained.</p>	Regulation & Compliance Officer and Training Manager	<p>Ongoing through spot checks and internal audits.</p> <p>Policy reviewed and new policy completed May 2022</p> <p>Training May 2022</p>
4.11	Invalid EOP	Systems & Data	<p>Reiterate to trainers the contract requirements regarding Evidence of Participation and what constitutes a valid point of EOP as per contract Clause 9.</p> <p>Investigate Calapults's ability to produce submission dates for student work (i.e. Evidence of Work Submitted).</p> <p>Conduct spot checks of student EOPs to ensure trainers provide points of EOP within Activity Start Date and Activity End Date. These spot checks should be conducted by an individual, independent from staff involved in training processes.</p>	Regulation & Compliance Officer and Training Manager	<p>Training May 2022</p> <p>July 2022</p> <p>Ongoing checks/internal audit to take place monthly, with evidence of checks documented.</p>

4. Management Action Plan (Cont.)

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.12	EOP not dated within 30 days of Activity End Date ('AED')	N/A	<p>Update relevant policies and procedures to include a section on the timeline requirements for points of EOP.</p> <p>Conduct refresher training for all staff involved in the collection and retention of EOP regarding the timeliness of EOP to evidence student participation on a subject level within the Activity Start and End Dates.</p> <p>Conduct sample checks of EOP to ensure evidence is dated within the relevant subject timeframes.</p>	Regulation & Compliance Officer and Training Manager	<p>Policy Reviewed and New policy written May 2022</p> <p>Training May 2022</p> <p>Ongoing checks/internal audit to take place monthly, with evidence of checks documented.</p>
4.13	Unable to sight when concession entitlement was sighted by Training Provider	N/A	<p>Implement a process to date stamp scanned concession entitlements prior to re-aiment within the student file.</p> <p>Conduct refresher training for all staff involved in student enrolments regarding assessment and sighting of concession entitlement prior to program commencement.</p>	Regulation & Compliance Officer and Training Manager	<p>Policy Review and new policy to be implemented July 2022</p> <p>July 2022</p>
4.14	Inaccurate SVTS data	N/A	Implement a review process of the SVTS data by an independent reviewer to ensure data entry is accurate.	Regulation & Compliance Officer and Training Manager	New Compliance Officer to undertake review August 2022

4. Management Action Plan (Cont.)

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.15	Invalid concession entitlement	N/A	<p>Conduct refresher training for all staff involved in student enrolments regarding assessment and sighting of valid concession entitlement prior to program commencement.</p> <p>Conduct spot checks on student enrolment folders to ensure evidence of valid concession cards is clearly scanned and retained on file.</p>	Regulation & Compliance Officer and Training Manager	<p>July 2022</p> <p>Ongoing checks/internal audit to take place monthly, with evidence of checks documented.</p>
4.16	Concession entitlement sighted after program commencement	Business Policy	<p>Update relevant policies and procedure to include a grace period in which student are able to produce evidence of concession entitlement post program commencement.</p> <p>Consider development of an internal Enrolment Checklist including the sighting and documentation of concession entitlement prior to program commencement.</p>	Regulation & Compliance Officer and Training Manager	<p>New Policy completed May 2022</p> <p>August 2022</p>
4.17	Statement of Fees ('SoF') did not meet contractual requirements	Business Process	Ensure relevant and up to date SoF are retained and stored within student files in a way which is easily accessible for future reference, where required.	Regulation & Compliance Officer and Training Manager	Policy to be reviewed and created August 2022

5. Status of Prior Audit Findings

The following comments relate to the status of the Management Action Plan from the BPA/TCA audit report dated 16 March 2021.

Reference	Prior Finding	Implementation Status & Comments
5.1	Evidence of Eligibility Assessment not accurately completed	In progress.
5.2	Unable to sight evidence of Pre-Training Review	In progress. Noted this previous Finding relates to Finding 3.4.
5.3	Unable to sight date Pre-Training Review was completed	In progress.
5.4	Pre-Training Review did not cover all Contract Requirements	In progress. Noted this previous Finding relates to Finding 3.5.
5.5	Training Plan did not align with Training & Assessment Strategy	In progress. Noted this previous Finding relates to Finding 3.7.
5.6	Training Plan did not align with Training & Assessment Strategy	In progress.
5.7	Training Plan was not signed within 4 weeks of program commencement	In progress.
5.8	Training Plan data does not align with the data reported in SVTS	In progress. Noted this previous Finding relates to Finding 3.9.
5.9	Evidence of Participation is non-complaint	In progress. Noted this previous Finding relates to Finding 3.11.
5.10	Evidence formal withdrawal dated after the AED	In progress.
5.11	Unable to sight date which Evidence of Concession was sighted	In progress. Noted this previous Finding relates to Finding 3.16.
5.12	Reported Hourly Client Tuition Fee Rate within the Statement of Fees does not align with the data reported in SVTS	In progress.

6. Next Steps

As noted in the letter dated 8 April 2022 notifying your organisation of this audit, other potential actions that may be taken by the Department following this contract compliance audit include:

- Evidence of Eligibility audit, assessing whether a Training Provider has sufficient evidence of eligibility to support student program enrolments for which government subsidised training has been claimed.
- Evidence of Concession audit, assessing whether a Training Provider has sufficient evidence of concession to support the granting of a fee concession claimed under the previous Contract
- Evidence of Participation audit, assessing whether a Training Provider has sufficient evidence of participation to support claims for payment for training delivery in specific subjects for which funding has been claimed.
- Pre-Training Review, assessing the process undertaken between the Training Provider and a prospective student to determine the most suitable and appropriate training for that individual, to confirm that it has been conducted and documented in accordance with the requirements of the Contract and the Quality Charter.
- Rectification Review, assessing the extent to which the Management Action Plan arising from the Business Process and/or Transactional Compliance Audits have been implemented by a Training Provider.
- Quality Review, assessing the quality of Training Services that have been, or are being, delivered at a Training Provider.
- A combination of audits and reviews.
- Monetary penalties may be imposed.
- Further action as noted in the Contract.
- No further action.

Further, in accordance with Clause 11.3(b)(iii) of the Contract, where a Management Action Plan has been developed the Training Provider must advise the Department in writing (including submitting appropriate documentation as determined by the Department) of compliance with and implementation of the auditor's recommendations and/or Management Action Plan within six months of the date of this report.

Appendix A – Eligibility Exceptions

Sample No.	Student ID	Program ID	Enrolment Date	Program C'ment Date	Date of eligibility assessment	Rep. Ref. 3.1 ✓	Rep. Ref. 3.2 ✓	Rep. Ref. 3.3 ✓	Other information	Training Provider Comments
BPA-1	06203	MEM30319	15-11-2021	23-11-2021	15/11/2021	✓			Student appears to be ineligible. Student did not meet the upskilling requirement (i.e. previously completed a Certificate III and is currently enrolling in a Certificate III). Training Provider has not provided an eligibility exemption to exempt the student from the upskilling requirement.	Need for training and further resource creation to train and upskill administration staff has been identified and the corrective action has begun to be implemented by both the Regulation and Compliance Officer and the Training Manager. Administration Staff prior to Feb 2022 are no longer with the organisation.
BPA-2	05918	BSB30120	16-08-2021	16-08-2021	28/04/2021		✓✓		Eligibility Form has ticked 'Australian Birth Certificate'. However, in the attachments provided we have sighted a Medicare card. SVTS states an eligibility exemption has been granted, however the Eligibility Form has eligibility exemption ticked as 'No'. Management advised exemption was granted in error.	Need for further training to staff in regard to accurate data entry and accuracy when reviewing documentation and the identification, communication and rectification or errors discovered.
6	06123	MEM20105	17-08-2021	17-08-2021	17/08/2021			✓	Student Declaration (17/08/2020) dated one year prior to Training Provider Declaration (17/08/2021). Management advised student date was inaccurate.	Need for further training to staff in regard to accurate data entry and accuracy when reviewing documentation and the identification, communication and rectification or errors discovered.
10	06192	BSB30120	26-10-2021	04-11-2021	26/10/2021		✓		Student has stated their answer to 2x2x2 question 'same level at a lifetime' as 'not applicable'. The not applicable answer is only relevant if they are enrolling in a Foundation Skills list program. Note: Enrolment Form states the same answer.	Identification for the need for specific target training regarding eligibility and how to ascertain eligibility. Need for revision and implementation for clearer policies and procedures. Need for resources such as flow charts to aid the implementation of policies and procedures. Need for delegated individuals to be only responsible individuals for assessments of eligibility . Need for ongoing spot checks and internal audits to ensure that eligibility assessments are compliant and accurate.

Appendix A – Eligibility Exceptions (Cont.)

Sample No.	Student ID	Program ID	Enrolment Date	Program C'ment Date	Date of eligibility assessment	Rep. Ref. 3.1 ✓	Rep. Ref. 3.2 ✓	Rep. Ref. 3.3 ✓	Other information	Training Provider Comments
18	04204	BSB40520	19-11-2021	22-11-2021	17/06/2019			✓	Date of eligibility assessment has been completed on 17/06/2019. However, the enrolment date is 19/11/2021 (889 days before). Management advised program was superseded. Originally the student commenced 18/06/2019 in BSB42015 and was transitioned into BSB 42020 19/11/2021.	<p>Identification for clearer policies and procedures as well as training regarding record keeping.</p> <p>Need for ongoing spot checks and internal audits to ensure that eligibility assessments are compliant and accurate.</p> <p>Need for clearer documentation to demonstrate evidence of learner's journey.</p>
TOTAL						1	3	2		

Appendix B – PTR Exceptions

Sample No.	Student ID	Program ID	Program C'ment Date	Date of PTR assessment	Rep. Ref. 3.4 ✓	Rep. Ref. 3.5 ✓	Other information	Training Provider Comments
BPA-2	05918	BSB30120	16-08-2021	Not provided	✓		PTR not provided.	Identification for clearer policies and procedures as well as training regarding record keeping. Need for clearer documentation to demonstrate evidence of learner's journey.
10	06192	BSB30120	04-11-2021	14/10/2021		✓	We were unable to sight student's answers to relevant questions (i.e. questions relating to objectives, previous competencies and appropriate materials). This PTR was completed electronically. In these instances, we were able to sight every potential multiple-choice answer instead of the one selected by the student.	Need identified to review software used for PTR's and the reporting capabilities. Need for meeting with software company regarding regulation needs and organisation needs and conduct audit to determine if software is meeting the needs.
11	06053	CHC33015	13-07-2021	Not provided	✓		PTR not provided.	Identification for clearer policies and procedures as well as training regarding record keeping. Need for clearer documentation to demonstrate evidence of learner's journey
16	06033	CHC33015	14-07-2021	Not provided	✓		As above.	As above.
17	06021	BSB30120	01-07-2021	Unable to sight date of assessment		✓	The 'Office Use Only' section has not been filled out to acknowledge if course is most suitable. Additionally, as this has not been completed, we are unable to determine that the PTR has been assessed prior to program commencement.	Identification for clearer policies and procedures as well as training regarding record keeping. Need for clearer documentation to ensure that accurate assessments are undertaken to determine student's eligibility. Appoint delegated of the organisation that are the only individuals able to assess suitability.
18	04204	BSB40520	22-11-2021	Not provided	✓		PTR not provided.	Identification for clearer policies and procedures as well as training regarding record keeping. Need for clearer documentation to demonstrate evidence of learner's journey
19	05713	BSB30115	20-07-2021	Not provided	✓		As above.	As above.
TOTAL					5	2		

Appendix C – Training Plan Exceptions

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
BPA-1	06203	MEM30319	All Subjects	All Subjects	All Subjects	Yes	✓				Monthly Trainee / Apprentice Contacts not provided.	New Policy and Procedures to be created, training to be provided to all trainers regarding training responsibilities. Trainer and Trainee responsibilities to be listed in handbooks to ensure and encourage accountability.
BPA-1	06203	MEM30319	MEM12023	30	30	Yes		✓			Assessment method within the TAS (Learner Guide) was not included within the Training Plan.	Previous Training Manager and Compliance Officer (No longer with organisation) were not experienced and lacked knowledge. Immediate revision of all TAS's required.
BPA-1	06203	MEM30319	MEM14006	40	40	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM13015	40	40	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM05050	20	20	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM16006	20	20	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM18001	20	20	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM12024	30	30	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM09002	40	40	Yes		✓			As above.	As above.
BPA-1	06203	MEM30319	MEM18002	20	20	Yes		✓			As above.	As above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
BPA-1	06203	MEM30319	MEM05007	20	20	Yes		✓			Assessment method within the TAS (Learner Guide) was not included within the Training Plan.	Previous Training Manager and Compliance Officer (No longer with organisation) were not experienced and lacked knowledge. Immediate revision of all TAS's required.
BPA-1	06203	MEM30319	MEM05052	40	40	Yes		✓			Unable to sight subject code MEM05052 within TAS.	As above.
BPA-1	06203	MEM30319	MEM11011	20	20	Yes		✓			Assessment method within the TAS (Learner Guide) was not included within the Training Plan.	As above.
BPA-2	05918	BSB30120	All Subjects	All Subjects	All Subjects	Yes	✓				Monthly Trainee / Apprentice Contacts not provided.	As above.
BPA-2	05918	BSB30120	BSBOPS304	35	35	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (18/10/2021 - 18/11/2021) - SVTS (08/09/2021 - 20/09/2021)	3.7 - As above. 3.9 - Need for Policy and Procedure creation and resources such as checklists to assist with the cross checking of Evidence, Training Plan, EOP and Student Management System to ensure data entry is accurate and compliant. Training to be provided to all relevant staff.
BPA-2	05918	BSB30120	BSBWHS311	40	40	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (10/01/2022 - 10/02/2022) - SVTS (08/02/2022 - 28/03/2022)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBDAT201	40	40	Yes		✓		✓	3.7 - Subject BSBDAT201 not included in TAS. 3.9 - TP (27/09/2021 - 27/10/2022) - SVTS (10/01/2022 - 23/02/2022)	3.7 - As above. 3.9 - As above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
BPA-2	05918	BSB30120	BSBTWK301	30	30	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (20/12/2021 - 20/01/2022) - SVTS (08/11/2021 - 14/12/2021)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBTEC404	50	50	Yes		✓		✓	3.7 - Subject BSBTEC404 not included in TAS. 3.9 - TP (29/11/2021 - 29/12/2021) - SVTS (08/12/2021 - 22/02/2022)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBSTR301	40	40	Yes		✓		✓	3.7 - Subject BSBSTR301 not included in TAS. 3.9 - TP (08/11/2021 - 08/12/2021) - SVTS (22/11/2021 - 07/02/2022)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBPEF201	50	50	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP ASD (16/08/2021) - SVTS ASD (18/08/2021)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	SIRXCEG002	40	40	Yes		✓		✓	3.7 - Subject SIRXCEG002 not included in TAS. 3.9 - TP (21/02/2022 - 28/03/2022) - SVTS (20/09/2021 - 16/10/2021)	3.7 - As above. 3.9 - As above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
BPA-2	05918	BSB30120	BSBCRT311	40	40	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (06/09/2021 - 06/10/2021) - SVTS (18/01/2022 - 23/02/2022)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBXCM301	40	40	Yes		✓		✓	3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (31/01/2022 - 28/02/2022) - SVTS (28/09/2021 - 19/10/2021)	3.7 - As above. 3.9 - As above.
BPA-2	05918	BSB30120	BSBXTW301	40	40	Yes		✓		✓	3.7 - Subject BSBXTW301 not included in TAS. 3.9 - TP (31/01/2022 - 28/02/2022) - SVTS (13/10/2021 - 10/11/2021)	3.7 - As above. 3.9 - As above.
1	06125	MEM20105	MEM15002A	20	20	No				✓	TP does not include actual AED (proposed AED does not align) - SVTS AED (28/10/2021)	As above.
2	06001	BSB30120	BSBLDR301	40	40	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS does not include subject code BSBLDR301. 3.9 - TP (9/10/2021 - 9/01/2022) - SVTS (28/07/2021 - 8/09/2021)	3.6 - Identified need for Policy and Procedure Review and Creation which has taken place, with training to follow by end of May 2022 with all relevant staff. 3.7 - As above. 3.9 - As above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
7	06069	BSB30120	BSBXCM301	40	40	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS includes assessment methods (Demonstration, Project research, Online Learning and Third-Party report) which TP does not. 3.9 - TP (10/03/2022 - 10/06/2022) - SVTS (15/11/2021 - 4/01/2022)	3.6 - As Above. 3.7 - As Above. 3.9 - As Above.
8	05715	MEM30319	MEM13015	40	40	Yes	✓				Monthly Trainee / Apprentice Contacts not provided.	As Above.
9	05999	BSB40120	BSBPEF502	60	60	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS does not include subject code BSBPEF502. 3.9 - TP (08/11/2021 - 08/02/2022) - SVTS (18/10/2021 - 15/11/2021)	3.6 - As Above. 3.7 - As Above. 3.9 - As Above.
10	06192	BSB30120	BSBCRT311	40	40	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS includes assessment methods (Demonstration, Project, Online Learning and Third-Party report) which TP does not. 3.9 - TP (17/11/2021 - 17/02/2022) - SVTS (16/12/2021 - 07/01/2022)	3.6 - As Above. 3.7 - As Above. 3.9 - As Above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
12	06075	BSB40120	BSBLDR411	50	50	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS does not include subject code BSBLDR411. 3.9 - TP (13/08/2021 - 13/11/2021) - SVTS (13/08/2021 - 11/10/2021)	3.6 - As Above. 3.7 - As Above. 3.9 - As Above.
13	06008	MEM20105	MEM12024 A	30	30	Yes	✓	✓			3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS includes assessment methods (Demonstration, Project, Online Learning and Third-Party report) which TP does not.	3.6 - As above. 3.7 - As above.
14	05962	MEM30319	MEM05052	40	40	Yes	✓				Monthly Trainee / Apprentice Contacts not provided.	As Above.
17	06021	BSB30120	BSBWHS311	40	40	Yes	✓	✓		✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS includes assessment methods (Demonstration, Project, Online Learning and Third-Party report) which TP does not. 3.9 - TP (22/12/2021 - 23/03/2022) - SVTS (01/07/2021 - 13/07/2021)	3.6 - As Above. 3.7 - As Above. 3.9 - As Above.

Appendix C – Training Plan Exceptions (Cont.)

Sample No.	Student ID	Program ID	Subject ID	Scheduled Hours Reported	Scheduled Hours on Training Plan	Apprentice / Trainee?	Rep. Ref. 3.6 ✓	Rep. Ref. 3.7 ✓	Rep. Ref. 3.8 ✓	Rep. Ref. 3.9 ✓	Other information	Training Provider Comments
19	05713	BSB30115	BSBSUS201	20	20	Yes	✓	✓	✓	✓	3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 - TAS does not include subject code BSBSUS201. 3.8 - Training Plan does not include assessment methods. 3.9 - TP (26/02/2021 - 28/05/2021) - SVTS (20/07/2021 - 19/08/2021)	3.6 - As above. 3.7 - As Above. 3.8 - Identified need to meet with Student Management System for training and rectification of pre-populated information. Creation of resources such as spreadsheets to outline all courses, units and assessment methods. 3.9 - As above.
20	06217	MEM30319	MEM13015	40	40	Yes	✓	✓			3.6 - Monthly Trainee / Apprentice Contacts not provided. 3.7 – TAS includes assessment method (Learner Guide) which TP does not.	3.6 - As above. 3.7 - As above.
TOTAL							13	32	1	19		

Appendix D – Training Participation Exceptions

Sample No.	Student ID	Subject ID	Activity Start Date	Activity End Date	First point of EOP Date	Second point of EOP Date	Rep. Ref. 3.10 ✓	Rep. Ref. 3.11 ✓	Rep. Ref. 3.12 ✓	Other information	Training Provider Comments
BPA-1	06203	MEM16006	07-12-2021	25-01-2022	Not provided	25/01/2022	✓			EOP1 not provided.	Identified need for policy and procedure to be reviewed and new policy and procedure to be implemented. This has been created as of May 2022. Training to be provided by the end of May 2022. Internal sport checks and audits to take place on an ongoing basis with documented proof these have taken place .
BPA-2	05918	BSBWHS311	08-02-2022	28-03-2022	Unable to Sight	28/03/2022		✓		EOP1 - Evidence of work submitted (invalid EOP) - unable to sight date.	As above.
BPA-2	05918	BSBDAT201	10-01-2022	23-02-2022	Unable to Sight	23/02/2022		✓		As above.	As above.
BPA-2	05918	BSBTWK301	08-11-2021	14-12-2021	Unable to Sight	14/12/2021		✓		As above.	As above.
BPA-2	05918	BSBTEC404	08-12-2021	22-02-2022	Unable to Sight	22/02/2022		✓		As above.	As above.
BPA-2	05918	BSBSTR301	22-11-2021	07-02-2022	Unable to Sight	7/02/2022		✓		As above.	As above.
BPA-2	05918	BSBPEF201	18-08-2021	02-09-2021	Unable to Sight	2/09/2021		✓		As above.	As above.
BPA-2	05918	BSBCRT311	18-01-2022	23-02-2022	Unable to Sight	23/02/2022		✓		As above.	As above.
2	06001	BSBLDR301	28-07-2021	08-09-2021	Not provided	8/09/2021	✓			EOP1 not provided.	As above.

Appendix D – Training Participation Exceptions (Cont.)

Sample No.	Student ID	Subject ID	Activity Start Date	Activity End Date	First point of EOP Date	Second point of EOP Date	Rep. Ref. 3.10 ✓	Rep. Ref. 3.11 ✓	Rep. Ref. 3.12 ✓	Other information	Training Provider Comments
3	06057	CHCPAL001	20-10-2021	20-01-2022	Unable to Sight	23/11/2021		✓	✓	3.11 - EOP1 - Evidence of work submitted (invalid EOP) - unable to sight date. 3.12 - EOP2 not dated within 30 days of AED.	As above.
4	06056	BSBWOR301	30-08-2021	14-10-2021	Not provided	14/10/2021	✓			EOP1 not provided.	As above.
5	06060	CHCAGE005	06-10-2021	31-01-2022	16/11/2021	16/12/2021			✓	EOP2 not dated within 30 days of AED.	As above.
7	06069	BSBXC301	15-11-2021	04-01-2022	Not provided	15/12/2021	✓			EOP1 not provided.	As above.
11	06053	CHCAGE001	11-08-2021	31-01-2022	Unable to Sight	28/09/2021		✓	✓	3.11 - EOP1 - Evidence of work submitted (invalid EOP) - unable to sight date. 3.12 - EOP2 - EOP dated more than 30 days prior to AED.	As above.
16	06033	CHCCS023	11-08-2021	31-01-2022	Unable to Sight	21/09/2021		✓	✓	3.11 - EOP1 - Evidence of work submitted (invalid EOP) - unable to sight date. 3.12 - EOP2 not dated within 30 days of AED.	As above.
17	06021	BSBWHS311	01-07-2021	13-07-2021	N/A - Invalid EOP	N/A		✓		3.11 - EOP1 - Login & Engagement (invalid EOP) - unable to sight student name / ID, unable to see continuous engagement (only able to see one action on ASD).	As above.
TOTAL							4	11	4		

Appendix E – Fee Concessions Exceptions

Sample No.	Student ID	Program ID	Enrolment Date	Program C'ment Date	Fee Exemption / Concession Type	Rep. Ref.	Rep. Ref.	Rep. Ref.	Rep. Ref.	Other information	Training Provider Comments
						3.13	3.14	3.15	3.16		
BPA-2	05918	BSB30120	16-08-2021	16-08-2021	Health Care Card				✓	HCC sighted 28/04/2021 after program commencement 16/04/2021.	Need identified for further training on the sighting and retention of evidence and identification. Revision and creation of clear policy and procedures as well as documentation such as a declaration the meets regulations. Spot checks and internal audits to take place on both concessions as well an enrolments documentation and data entry process as a whole on an ongoing basis. With evidence of audit documented.
1	05742	CHC43115	08-02-2021	4/03/2021	Health Care Card			✓		Training Provider has sighted HCC on 18/02/2021. However, HCC expired (26/09/2020) before the enrolment date (08/02/2021).	As above.
14	05918	BSB30115	29-03-2021	29/03/2021	Health Care Card				✓	HCC sighted 28/04/2021 after program commencement 29/03/2021.	As above.
29	05666	BSB30115	13-01-2021	15/01/2021	Health Care Card	✓				Unable to verify when entitlement was checked.	As above.
39	05832	BSB30115	29-03-2021	29/03/2021	Health Care Card	✓				Unable to verify when entitlement was checked.	As above.
47	05909	CHC30213	20-04-2021	20/04/2021	Health Care Card	✓				Unable to verify when entitlement was checked.	As above.
54	05962	MEM20105	24-05-2021	24/05/2021	Health Care Card			✓		Unable to identify whether HCC or PCC was provided. (digital wallet scan).	As above.
56	05721	CHC33015	03-02-2021	4/03/2021	Pensioner Concession Card	✓				Unable to verify when entitlement was checked.	As above.
59	05762	CHC30213	03-03-2021	9/03/2021	Health Care Card		✓			Management advised student does not hold a concession entitlement. Additionally, Enrolment Form shows student indicated had no concession.	As above.
TOTAL						4	1	2	2		

Appendix F – Fee Exceptions

Sample No.	Student ID	Program ID	Program C'ment Date	Reported Hourly Client Tuition Fee Rate (SVTS)	Rep. Ref. 3.17 ✓	Other information	Training Provider Comments
BPA-2	05918	BSB30120	16-08-2021	\$0.05	✓	Unable to sight the following within the provided SoF: - Code, title and currency of the program - Approx. government contribution	Identified need for revision of SoF documentation, policy to be implemented and further documentation created to meet regulation requirements while also making the SoF easier to understand for learners and those nominated to pay fees such as the employer. Training to be provided to any newly implemented policies and procedures.
TOTAL					1		