2021 *SKILLS FIRST*

INTERNAL AUDIT CHECKLIST

Version 1

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## What is the Internal Audit Checklist?

The Internal Audit Checklist (IAC) is a self-assessment tool that training providers are required to complete each year to check how they’re meeting their obligations under the VET Funding Contracts (the Contract).

## How do I use it?

The IAC is designed to help you recognise and resolve any compliance issues before they are identified at a Department audit or review.

The IAC consists of a series of compliance questions categorised by sections under the Contract. By answering these questions, you will identify potential gaps in your Contract compliance that require your further consideration and review. To resolve these compliance issues, you must create a rectification plan.

We intend the IAC to be used as a compliance review tool rather than an instruction about how you should comply with every aspect of the Contract.

The IAC should only be one part of your internal controls and continuous improvement processes and not relied upon on as the sole process for monitoring your compliance. Compliance checking should happen all year round as part of your regular assurance and continual improvement practices. This may include doing your own testing of sample student files.

You should not rely on the IAC in place of all requirements in the Contract.

It is important for that you keep up to date with all information and resources, including Contract Notifications which may vary the Contract’s requirements, as published on SVTS.Why do I need to complete an IAC?

It is a Contract requirement that by 30 June of each year, you must:

* conduct an annual internal audit of your compliance with the Contract, that’s signed by your CEO (clause 11.5);
* have the completed IAC signed by the CEO (or equivalent) of your organisation (clause 11.6); and
* develop a rectification plan to fix any compliance issues (clause 11.7).

We (or our auditors or reviewers) may ask you for a copy of your internal audit or rectification plan to verify its completion.

## How has it changed?

We recognise that you are well placed to identify how the IAC could be improved and have formally consulted with some training providers about the IAC’s usability to help develop this new version.

We used your feedback to simplify the IAC’s structure and language, making it easier to read and use in practice. These improvements will help you better check and understand your obligations under the Contract. We welcome your feedback on these changes, which can be submitted via SVTS under the category *‘Contract Compliance Audit Program – Internal Audit Checklist’*

Diagram

Description automatically generated

## Instructions

These instructions are a guide to help you use and complete the IAC.

### Sections

The IAC is separated into sections that represent broad compliance areas under the Contract. Each of these sections is divided into numbered compliance topics. It is within these defined topics that you complete your compliance checking and self-assessment.

### Considerations

These considerations are formulated as a series of questions to ask yourself about your current compliance practice. By answering these questions, you may uncover and find potential compliance issues.

### Findings

Use this space to describe the compliance practices you’ve identified for this section, including any gaps in your compliance that need to be addressed. Your findings should be based upon your assessment of the adequacy and standard of any evidence you’ve collected about your practices.

### Evidence

Use this space to add evidence of how you’ve met the compliance expectations for this section. You can embed or attached documents that support your assessment. For example, your latest TAS or Regulator Audit Report.

### Contract and Guidelines clauses

We’ve set out the clauses in the Contract or Guidelines that relate to the compliance topic. We recommend you have the Contract and Guidelines next to you while you do your checking so you clearly understand your obligations.

### Useful resources

We recognise that the Contract and Guidelines can at times be complex and difficult to understand.

All year round we produce guidance materials to help you better understand your obligations and what we expect from you. This includes fact sheets on specific topics and working templates. These materials are expressed in clear and concise language and address the more commonly asked questions about working under the Contract.

All resources are available on SVTS. We’ve used these icons to let you know what resources are available relevant to the compliance area you’re assessing.

| Icon | Description |
| --- | --- |
|  | Common Audit Finding identified in the *2018-19 audit and assurance findings and Department resources*, published on SVTS on 17 December 2019. |
|  | Suggestions for improving compliance. |
|  | Fact sheets, templates and other guidance documents to assist training providers. All documents are published on SVTS. |
|  | Training opportunities available through the VET Development Centre. Please refer to SVTS for all current professional development sessions available. |

### Self-assessment status

Use the tick boxes to record whether you think your organisation complies with the section you’ve just assessed.

If you are mostly complaint but there are some minor issues you need to further investigate, we recommend that you tick non-complaint. This ensures that you are reminded to follow up on even minor issues.

### Actions if non-compliant

Use this space to list the areas you’ve assessed as non-compliant and the associated actions you plan to take to remedy each of the issues. Alternatively, you can refer to the relevant section in your rectification plan where you’ve outlined the actions to address these issues.

## IAC Overview

|  |  |
| --- | --- |
| Section title | Section details |
| [**1. General obligations of Training Provider**](#_General_Obligations_of) | 1.1 Maintain registration and standards  1.2 Requirements for *Skills First* Teachers  1.3 Comply with Laws  1.4 Comply with Department directions and policies  1.5 Act ethically  1.6 Be accountable  1.7 Arrangements with National Enterprises (Non-Victorian Based Training Provider Contract only) |
| **[2. Scope of the Training Services](#_2._Scope_and_1)** | 2.1 Funded scope  2.2 Commencement and Program Allocations (Standard and Non-Victorian Based Training Provider Contracts only)  2.3 Foundation Skills Approved Provider List |
| [**3. Subcontracting**](#_3._Subcontracting) | 3.1 Subcontracting of Pre-Training Review  3.2 Subcontracting of training and assessment and subcontracting generally |
| [**4. Reporting and information**](#_4._Reporting_and) | 4.1 Reporting generally  4.2 Reporting of subcontract arrangements for Brokering Services  4.3 Change in Control  4.4 Notification of events |
| [**5. GST**](#_5._GST) | 5.1 GST |
| **[6. Records](#_6._Records)** | 6.1 Record keeping requirements  6.2 Security and integrity of Records  6.3 Accounting Records  6.4 Providing access to Records  6.5 Electronic signatures |
| **[7. Audit, review and investigation](#_7._Audit,_review)** | 7.1 Audits, reviews and investigations by Department  7.2 Internal Audits |
| [**8. Liability, indemnity and insurance**](#_8._Liability,_indemnity) | 8.1 Liability, indemnity and insurance |
| [**9. Student information and protection**](#_9._Student_information) | 9.1 Marketing and recruiting students  9.2 Promotional materials  9.3 Training Provider website and Victorian Skills Gateway |
| [**10. *Skills First* eligibility**](#_10._Skills_First) | 10.1 Eligibility requirements and exemptions  10.2 Additional eligibility requirements for Apprentices and Trainees  10.3 Additional eligibility requirements for individuals under 17 years of age |
| [**11. Assessing and evidencing eligibility**](#_11._Assessing_and) | 11.1 Assessing and evidencing eligibility |
| [**12. Pre-Training Review and enrolment requirements**](#_12._Pre-Training_Review) | 12.1 Pre-Training Review  12.2 Enrolment requirements |
| [**13. Tuition and other fees**](#_13._Tuition_and) | 13.1 Tuition and other fees |
| [**14. Planning for training and assessment**](#_14._Obligations_for) | 14.1 Training and Assessment Strategy  14.2 Training Plan requirements (non-Apprentice/Trainee *Skills First* Students)  14.3 Training Plan requirements (Apprentices/Trainees) |
| [**15. Training and assessment**](#_15._Training_and) | 15.1 Amount of training  15.2 Training delivery |
| [**16. Practical Placements**](#_16._Practical_Placements) | 16.1 Practical Placements |
| [**17. Evidence of Participation**](#_17._Evidence_of) | 17.1 Evidence of Participation |
| **[18. Reporting training activity, government-subsidised tuition fees and other information](#_18._Reporting_training)** | 18.1 Reporting training activity, government-subsidised tuition fees and other information |
| [**19. Determining and paying Funds**](#_19._Determining_and) | 19.1 Fee Concession / Fee Waiver Contribution  19.2 Payment of Funds |
| [**20. Programs and initiatives**](#_20._Programs_and) | 20.1 Conditions |
| [**Rectification plan template**](#_Rectification_plan) | |
| [**SAMPLE rectification plan**](#_Sample_rectification_plan) | |
| [**CEO endorsement**](#_CEO_Endorsement) | |

## 2021 IAC

### 1. General obligations of Training Provider

|  |  |  |
| --- | --- | --- |
| 1.1 Maintain registration and standards | | |
| **Considerations** | 1.1.1 Do you have a process to notify the Department immediately if your registration is suspended or cancelled?  1.1.2 Do you have at least one nationally recognised qualification on your Scope of Registration?  1.1.3 Do you ensure your programs:   * meet the requirements of the accredited course or endorsed national Training Package; and * are consistent with purchasing guides, directions or policies?   1.1.4 Do you comply with the applicable Regulatory Standards? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of your Scope of Registration from training.gov.au (TGA), highlighting all the programs you deliver under* Skills First *to verify they are active on your Scope of Registration.* * *Your latest Regulator Audit Report and the policies and procedures you adopted to ensure compliance.* * *Your latest review of a TAS.* | |
| **Contract and Guidelines clauses** | **Clause 4.1**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 1.2 Requirements for *Skills First* Teachers | | |
| **Considerations** | 1.2.1 Do you establish and maintain up to date Records of *Skills First* Teachers and what programs they deliver?  1.2.2 Do all your *Skills First* Teachers hold the relevant qualifications as required by the applicable regulator?  1.2.3 Are *Skills First* Teachers aware of their obligation to undergo certain professional development courses or training, within a timeframe determined by the Department, and consistent with the relevant Regulatory Standards?  1.2.4 Are *Skills First* Teachers engaged through a subcontractor, engaged under an appropriate subcontracting arrangement? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * Skills First *Teacher files.* * *Position descriptions for your Teachers.* | |
| **Contract and Guidelines clauses** | **Clauses 4.2 – 4.5 and clause 6**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 1.3 Comply with Laws | | |
| **Considerations** | 1.3.1 Do you ensure that all your staff are aware of their legal obligations? Including but not limited to the following:   * Occupational health and safety Laws; * the Australian Consumer Law (set out in Schedule 2 of the Competition and Consumer Act 2010 (CT)); * privacy Laws; * antidiscrimination and equal opportunity Laws; * Disability Act 2006 (Vic); * the Working With Children Act 2005 (Vic); * Charter of Human Rights and Responsibilities Act 2006 (Vic); and * Child Wellbeing and Safety Act 2005 (Vic) | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Any material that outlines these requirements, such as a staff induction program or handbook.* | |
| **Contract and Guidelines clauses** | **Clause 4.6**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 1.4 Comply with Department directions and policies | | |
| **Considerations** | 1.3.1 Do you:   * comply with the *Skills First* Quality Charter? * regularly check the Skills Victoria Training System (SVTS) home page for new Contract Notifications and Executive Memoranda? * promptly circulate Contract Notifications and Executive Memoranda to all relevant staff for reference? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of staff meeting minutes or all staff emails where new Contract Notifications are circulated or discussed.* | |
| **Contract and Guidelines clauses** | **Clause 4.7**  [***Skills First* Quality Charter**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link40)  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 1.5 Act ethically | | | |
| **Considerations** | 1.4.1 Do you uphold the values and objectives of the *Skills First* Program?  1.4.2 Are your staff aware of their ethical obligations? Including that they cannot offer any person or organisation an incentive to encourage them to undertake government-subsidised training with you?  1.4.3 How do you ensure that it does not engage, employ, contract or otherwise deal with any Disallowed Person? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of staff meeting minutes or all staff emails where new executive memoranda or Contract Notifications are circulated or discussed.* | | |
| **Contract and Guidelines clauses** | **Clause 4.8**  [***Skills First* Quality Charter**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link40)  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Fact sheet: Disallowed Persons** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 1.6 Be accountable | | |
| **Considerations** | 1.6.1 Are staff (including subcontractors) aware of their obligations under the Contract, including the relevant Regulatory Standards and Department Contract Notifications?  1.6.2 Do you ensure that the Funds received for the purpose of providing the Training Services are used for the relevant student to whom such Funds apply?  1.6.3 Is there appropriate Segregation of Duties for the provision of Training Services and receipt of the Funds from the Department?  1.6.4 Do you have a process in place to maintain security of Intellectual Property?  1.6.5 Do your relevant staff participate in performance improvement initiatives? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clause 4.9**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 1.7 Arrangements with national enterprises | | |
| If N/A, proceed to [2. Scope of the Training Services](#_2._Scope_and_1) | | |
| **Considerations** | 1.6.1 Is your accredited training delivered to at least 50 Victorian employees of a National Enterprise per calendar year; and at least 50 employees of that National Enterprise are in Australian States or Territories other than Victoria per calendar year?  1.6.2 Do you have a process in place to notify the Department if any agreement relevant to Clause 4.12 (a) is suspended, cancelled, terminated, expired or is otherwise no longer in effect, within two weeks after that event? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Attach a copy of your agreement with the National Enterprise.* | |
| **Contract and Guidelines clauses** | **Clause 4.12 for Non-VIC Training Providers ONLY**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 2. [Scope of the Training Services](#_Scope_and_Provision)

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| --- | --- | --- |
| 2.1 Funded scope | | |
| **Considerations** | 2.1.1 Do you ensure it is only offering Funded places in the programs described in Schedule 2? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clauses 5.1 – 5.2**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 2.2 Commencement and Program Allocations | | |
| If N/A, proceed to [2.3 Foundation Skills Approved Provider List](#_2.3_Foundation_Skills) | | |
| **Considerations** | 2.2.1 Do you track commencements to ensure you do not exceed your Commencement Allocation and/or Program Allocation? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clauses 5.3 – 5.9 for Standard and Non-VIC Contracts ONLY**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 2.3 Foundation Skills Approved Provider List | | |
| **Considerations** | 2.3.1 Do your staff know whether you’re included or not included in the Foundation Skills Approved Provider List? Is this information shared across your organisation? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clauses 5.10 – 5.11 for Standard and Non-VIC Contracts**  **Clauses 5.3 – 5.4 for TAFE and Dual Sector Contracts**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 3. [Subcontracting](#_Subcontracting_of_the)

If no subcontracting, proceed to [4. Reporting and information](#_4._Reporting_and)

|  |  |  |
| --- | --- | --- |
| 3.1 Subcontracting of Pre-Training Review | | |
| **Considerations** | 3.1.1 Do you monitor and manage subcontracting arrangements to ensure that no aspect of the Pre-Training Review is subcontracted? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clause 6.3**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 3.2 Subcontracting of training and assessment and generally | | | |
| **Considerations** | 3.2.1 Do you have a process for ensuring that all subcontracting arrangements the Department approves meet the requirements of the Contract?  3.2.2 Do you ensure that each student who receives training and assessment under a subcontracting arrangement is aware they are enrolled with you and not the subcontractor?  3.2.3 Do you ensure that all subcontractors have appropriate qualifications and are suitably experienced and capable of providing Training Services as required by the Contract?  3.2.4 Do you ensure that subcontracting arrangements meet the requirements of the Contract?  3.2.5 Do you have controls in place to ensure that any work performed by the subcontractor meets the requirements of the Contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of the agreement used between your organisation and subcontractors or the list of subcontracting arrangements you provided to the Department.* * *Copies of the relevant qualifications and/or resumes of the subcontractors.* | | |
| **Contract and Guidelines clauses** | **Clauses 6.4 – 6.10**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **2021 Subcontracting Fact sheet** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### 4. [Reporting and information](#_Reporting_and_Provision)

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| --- | --- | --- |
| 4.1 Reporting generally | | |
| **Considerations** | 4.1.1 Does the Student Management System (SMS) you use comply with the Victorian VET Student Statistical Collection Guidelines and any published changes? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clause 7.1**  **The current Victorian VET Student Statistical Collection Guidelines can be accessed on the SVTS homepage.**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 4.2 Reporting of subcontract arrangements for Brokering Services | | | |
| **Considerations** | 4.2.1 Do you have processes to ensure that the Department is made aware of the details of all third party arrangements for the delivery of Brokering Services within 30 days of the Commencement Date of the Contract, and thereafter within 30 days of entering into such an arrangement? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of staff meeting minutes or all staff emails where the circulation of new executive memoranda or Contract Notifications are circulated or discussed.* | | |
| **Contract and Guidelines clauses** | **Clause 7.2**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Reporting Brokering Services - 2021** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 4.3 Change in Control | | |
| **Considerations** | 4.3.1 Do you have a process to ensure the Department is are notified of any proposed Change in Control at least 20 Business Days before the change takes effect?  4.3.2 Do you ensure that the person/s taking over Control are made aware that the Department may not approve the Change in Control and that any approval is at the Department's sole discretion? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clauses 7.3 - 7.4**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 4.4 Notification of events | | | |
| **Considerations** | 4.4.1 Do you have a process in place to promptly notify the Department about:   * a change to your VET Funding Contract? * any significant change to your organisational structure, ownership and/or operations? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Clauses 7.5 - 7.8 for Standard and Non-VIC Contracts**  **Clauses 7.5 - 7.7 for TAFE and Dual Sector Contracts**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Outline the position/s within your organisation with the responsibility for ensuring the Department is told about these events.** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### 5. GST

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| 5.1 GST | | |
| **Considerations** | 5.1.1 Is your GST registration up to date?  5.1.2 Do you have a valid ABN? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *A copy of your ABN.* * *Evidence demonstrating your GST registration.* | |
| **Contract and Guidelines clauses** | **Clauses 9.2 and 9.5**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### [6. Records](#_Accounts_and_Records)

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| 6.1 Record keeping requirements | | | |
| **Considerations** | 6.1.1 Do you ensure that:   * complete and accurate Records are created and maintained in line with Contract requirements for all students and information relating to the Training Services? * all Records relating to participation in training and the Training Services are retained for the periods outlined in the Contract and under any other relevant Act or Standard? * you comply with the relevant Regulatory Standards, PDP Act and Electronic Transactions (Victoria) Act 2000 (Vic)? * you securely store and retain ownership and custody of the Records in the event of a termination, or upon expiry of the Term of this Contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Clauses 10.1 – 10.8**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Fact sheet: Recordkeeping requirements** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 6.2 Security and integrity of Records | | | |
| **Considerations** | 6.2.1 Do you ensure that:   * all Records are stored securely in line with the Contract? * processes are in place to ensure that Records are not created or amended in such a way that they are not accurate?   6.2.2 Can you demonstrate, with supporting documents, that Records are held in a secure environment when they’re maintained in electronic form?  6.2.3 When you identify the need to amend a Record, do you have processes to document the amendment such that a reasonable person could ascertain the nature of and rationale for the amendment in a straightforward way? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Clauses 10.9 – 10.10**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Fact sheet: Recordkeeping requirements** | |
|  | **CN 2018-03: Making and/or amending Records** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 6.3 Accounting Records | | |
| **Considerations** | 6.3.1 Do you ensure that:   * you have appropriate accounting processes and controls? * you keep complete Records and accounts of all dealings with the Contract? * you keep accounting Records in relation to the Funds which can be audited by the Auditor-General of Victoria or any other entity directed by the Department? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clause 10.11**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 6.4 Providing access to Records | | | |
| **Considerations** | 6.4.1 Do you ensure that:   * all files are made available for audit or other purposes? * you can supply the Department with any information about your financial position, use of the Funds and/or your capacity to deliver the Training Services to government-subsidised students? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Clause 10.12**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Fact sheet: Recordkeeping requirements** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 6.5 Electronic signatures | | | |
| **Considerations** | 6.5.1 When using an electronic action by a person that is equivalent to a signature, do you ensure it is done in accordance with the definition in the Contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Clauses 10.14 – 10.16**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Fact sheet: using electronic signatures** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### 7[. Audit, review and investigation](#_Accounts_and_Records)

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| 7.1 Audits, reviews and investigations by Department | | |
| **Considerations** | 7.1.1 You must ensure that you participate in, assist with, and not prevent or unreasonably delay any audit, review or investigation. Has someone from your organisation been authorised to assist with, any audit, review or investigation in the CEO's absence?  7.1.2 Do you have a process in place to advise the Department in writing via SVTS, (and within 6 months of receipt of the audit recommendations), of your compliance with, and implementation of, the auditor's recommendations and/or Management Action Plan (MAP)?  7.1.3 Do you have processes in place to ensure the MAP is implemented? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clauses 11.1 - 11.3**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 7.2 Internal Audits | | |
| **Considerations** | 7.2.1 Do you ensure that your annual internal audit will be undertaken in accordance with any changes to the *Skills First* Program? For example, Contract Notifications or updates to Guidelines.  7.2.2 Is there a process in place to notify the Department of any non-compliances identified through an internal audit?  7.2.3 Have you documented a timeframe for the actions on your rectification plan to be completed? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Your rectification plan.* | |
| **Contract and Guidelines clauses** | **Clauses 11.4 and 11.7**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 8[. Liability, indemnity and insurance](#_Accounts_and_Records)

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| 8.1 Liability, indemnity and insurance | | |
| **Considerations** | 8.1.1 Do you have current and valid insurance cover for:   * workers compensation; * public liability; * professional liability/indemnity; and * property?   8.1.2 Have you kept your evidence of insurance cover and can give it to the Department on request? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of insurance certificates of currency, including details of limits on cover, and any other evidence of insurances maintained.* | |
| **Contract and Guidelines clauses** | **Clauses 13.1, 13.6 – 13.7 for Standard, Dual Sector and Non-Vic Contracts**  **Clauses 13.1, 13.4 – 13.5 for TAFE Contracts**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 9[. Student information and protection](#_Accounts_and_Records)

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| 9.1 Marketing and recruiting students | | |
| **Considerations** | 9.1.1 Do your marketing programs on the Funded Scope meets the Contract requirement? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of marketing, promotional or advertising materials* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clause 1.1**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 9.2 Promotional materials | | |
| **Considerations** | 9.2.1 Does your promotional material relating to *Skills First* training meet the requirements of the Contract? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Any promotional publication, report, signage or other material prepared that*   *relate to the Training Services.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clause 1.2**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 9.3 Training Provider website and Victorian Skills Gateway | | | |
| **Considerations** | 9.3.1 Is your most recent regulator audit report published on your website?  9.3.2 Do you ensure that you:   * publish indicative fees for *Skills Firs*t training for each program, and any other relevant fees, on your public website? * list all providers of Brokering Services? * publish the online service standards? * publish on your public website the complaints and appeals process? * maintain an up to date profile on the Victorian Skills Gateway? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A printout of your web page including URL.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 1.3 - 1.4 for Standard, TAFE and Dual Sector Contracts**  **Schedule 1, Clause 1.3 for Non-Vic Contract**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Online Services Standards** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### 10. [*Skills First* eligibility](#_Accounts_and_Records)

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| 10.1 Eligibility requirements and exemptions | | | |
| **Considerations** | 10.1.1 Do you ensure that your relevant staff understand and apply the student eligibility criteria for *Skills First* Funding when conducting eligibility assessments?  10.1.2 Have you incorporated the Guidelines About Determining Student Eligibility and Supporting Evidence into your eligibility assessment process?  10.1.3 Are all your staff aware of the eligibility exemptions and exceptions?  10.1.4 Do you ensure that all relevant eligibility exemptions and exceptions are considered as part of your eligibility assessment? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copy of your internal audit.* * *Correspondence from the Department confirming eligibility exemptions that may be granted by your organisation, if any.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 2.2 and 2.6 – 2.7**  [**Guidelines about Determining Student Eligibility and Supporting Evidence**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Common Audit Finding: Incomplete Eligibility Declarations.** | |
|  | **Conduct an audit of government subsidised student files that were granted an eligibility exemption. Are the forms complete? Is all the evidence available to support the decision? Are all sections signed?** | |
|  | **Fact Sheet: *Skills First* Eligibility** | |
|  | **Fact sheet: sighting and retaining evidence of eligibility** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 10.2 Additional eligibility requirements for Apprentices and Trainees | | |
| If N/A, proceed to [10.3 Additional eligibility requirements for individuals under 17 years of age](#_10.3_Additional_eligibility) | | |
| **Considerations** | 10.2.1 Do you ensure that an Apprentice/Trainee is:   1. employed in Victoria in either a full time or part time capacity under an award or registered agreement; 2. undertaking an Approved Training Scheme; and 3. a signatory to a Training Contract with their employer which is registered with the VRQA? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of the Training Contract with the employer if you are to deliver training to eligible Apprentices and/or Trainees through an Approved Training Scheme.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 2.8 – 2.9**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 10.3 Additional eligibility requirements for individuals under 17 years of age | | |
| If N/A, proceed to [11. Assessing and Evidencing Eligibility](#_11._Assessing_and) | | |
| **Considerations** | 10.3.1 Do you ensure that for students under 17 years of age:   * have received an exemption from school attendance; and * participate in training on a full-time basis, or combination of training and employment?   10.3.2 Do you ensure that evidence of the exemption from school attendance meets the requirements of the Contract and the Guidelines About Eligibility?  10.3.3 Do you ensure that you notify the relevant Regional Office and the student’s previous school if they stop attending training? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of the evidence of exemption from school attendance.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 2.9 – 2.12**  [**Guidelines about Determining Student Eligibility and Supporting Evidence**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 11. [Assessing and evidencing eligibility](#_Accounts_and_Records)

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| 11.1 Assessing and evidencing eligibility | | |
| **Considerations** | 11.1.1 Do you have clear and documented processes for determining students’ eligibility for *Skills First*?  11.1.2 Do you keep all relevant information and evidence of eligibility assessment on the student’s file and make it available for audit? Including:   * documenting any eligibility exemptions granted; and * for students enrolled in disability-specific programs, appropriate evidence of a permanent cognitive impairment or intellectual disability?   11.1.3 Do you ensure that all questions in the Student Declaration Form have been completed?  11.1.4 Do you ensure that only Eligible Individuals are enrolled in *Skills First*?  For Non-VIC only:  11.1.5 Do you retain the required evidence of eligibility documents and information outlined in Clause 3.4 Schedule 1? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copy of your internal audit.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 3.1 - 3.5**  **Schedule 1, Clauses 3.1 - 3.6 for Non-Vic Contracts**  [**Guidelines about Determining Student Eligibility and Supporting Evidence**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### [12.](#_Accounts_and_Records) Pre-Training Review and enrolment requirements

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| 12.1 Pre-Training Review | | | |
| **Considerations** | 12.1.1 Do you have a clear and documented business process for conducting Pre-Training Reviews that is consistent with the objectives in Clause 4 of the Contract?  12.1.2 Does your Pre-Training Review:   * identify the individual’s objectives for training and the likely job or further study outcomes from the development of new competencies and skills; * identify any competencies previously acquired, such as RPL, recognition of current competency (RCC) or credit transfer? * consider the student’s existing educational attainment and capabilities? * consider whether the student possesses the minimum literacy and numeracy skills to successfully complete the training they are enrolled in? * consider the student’s digital capability, where proposed learning includes portions delivered online; * identify the proposed learning strategies (including online delivery) and materials are appropriate for that individual and steps to overcoming any barriers in this regard? * document how you determined that the student’s program was suitable, and the most suitable, training option for them? * determine the appropriateness of the program level for the student? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 4.1 – 4.6**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Common Audit Findings:**   * **Literacy and numeracy is not considered; and** * **Why a program is 'suitable and appropriate' is not documented.** | |
|  | ***Skills First* Pre-Training Review - Sample Template 2019** | |
|  | **2019 Fact sheet: Consideration of literacy and numeracy as part of the Pre-Training Review** | |
|  | **The VDC conduct workshops on planning and delivering suitable and appropriate training and good practice language, literacy and numeracy (LLN) assessments. VDC workshops can be found in the 'Documents' section of SVTS.** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 12.2 Enrolment requirements | | | |
| **Considerations** | 12.2.1 Do you ensure that before enrolment, you have informed the student that their enrolment is under *Skills First* and explained how it will impact of their future entitlements?  12.2.2 Do you ensure that your enrolment processes include all mandatory enrolment questions from the Victorian VET Student Statistical Collection Guidelines?  12.2.3 Do you advise students about the possibility of receiving:   * an NCVER survey; * an invitation to participate in a Department-endorsed project; and * contact from by the Department (or our authorised persons) for audit purposes? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 4.8 – 4.12**  *Always refer to your relevant Contract type for specific detail* | | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_RECTIFICATION_PLAN) *where you’ve outlined the actions to address these issues)* | | |

### 13. Tuition and other fees

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| 13.1 Tuition and other fees | | | |
| **Considerations** | 13.1.1 Do you ensure that correct fees and charges are calculated and levied to students from 1 January each year as per the current guidelines set out in the Contract and any Contract Notifications?  13.1.2 Does your Statement of Fees include all the minimum information required for the enrolment?  13.1.4 Do you determine whether individuals are eligible to receive a concession, fee waiver or exemption from paying fees? Do the appropriate staff understand this process?  13.1.4 Do you collect and maintain evidence to support your application of fee concessions and fee waivers for each student, as required under the Guidelines About Fees?  13.1.5 Do you document the date you checked the student's entitlement to a concession? Do you record the date you sighted the evidence you retained? If the student is not on an individual payment plan, is their eligibility for concession re-checked each time you issue a new invoice?  13.1.6 Do you report the student’s eligibility for a fee concession/fee waiver/fee exemption that you’ve granted? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Your template for calculating fees and charges.* * *Copies of invoices issued to students.* * *Copy of your internal audit.* * *Your Statement of Fees* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 5.1 and 5.2**  [**Guidelines about Fees**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Conduct an audit of government subsidised student files to ensure correct fees and charges have been calculated and invoiced for the student.** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### [14.](#_Accounts_and_Records) Planning for training and assessment

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| 14.1 Training and Assessment Strategy | | | |
| **Considerations** | 14.1.1 Do you have a Training and Assessment Strategy (TAS) in place for each program and the cohort of students, that is consistent with the National RTO Standards, including the following attributes:   * modes of delivery * core and electives subjects * duration * resources * alignment with the Training Package.   14.1.2 If the TAS is structured to be completed in a shorter time than recommended in the AQF, have you explained in the TAS how the learner cohort has the characteristics to achieve the required rigour and depth of training, and can meet all of the competency requirements in the shorter timeframe?  14.1.3 Do you have a clear and documented business process to systematically review and evaluate each TAS? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of your TAS.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 6.1 - 6.4**  *Always refer to the relevant contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Common Audit Findings: Common Audit Finding: Training and Assessment Strategy program duration is not aligned with the AQF's Volume of Learning recommendation.** | |
|  | **The VDC conduct workshops on developing effective Training and Assessment Strategies. VDC workshops can be found in the 'Documents' section of SVTS.** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

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| 14.2 Training Plan requirements (non-Apprentice/ Trainee *Skills First* Students) | | |
| **Considerations** | 14.2.1 Do you have a clear and documented business process that shows how the information in the Training Plan is authorised and how it is provided to each student?  14.2.2 If the student is participating in workplace-based training, is the Training Plan agreed to and signed by the employer?  14.2.3 Is the information in the Training Plan:   * consistent with the programs/subjects to be attained; and * customised as required?   14.2.4 Does the information in the Training Plan align to the relevant TAS?  14.2.5 Do your Training Plans meet the requirements of the Contract?  14.2.6 Do you ensure that any changes to the Training Plan are communicated to the student as soon as practicable?  14.2.7 Does the reported subject data align to the actual Training Plan? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Training Plans provided to non-Apprentice/ Trainee Skills First Students.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses and 6.5 – 6.14**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 14.3 Training Plan requirements (Apprentices/ Trainees) | | |
| If N/A, proceed to [15. Training and assessment](#_15._Training_and) | | |
| **Considerations** | 14.3.1 Are your Training Plans jointly developed and signed and dated by you, the employer and the Apprentice/Trainee?  14.3.2 Are the Training Plans:   * vocationally relevant; * reflect industry requirements; and * supported by appropriate work within the workplace?   14.3.3 Do your Training Plans meet the Contract requirements relating to Apprentices/Trainees?  14.3.4 Do you regularly review the status of the Apprentice's or Trainee’s training, so that the Training Plan can facilitate progression and completion?  14.3.5 Do you ensure that any changes to the Training Plan are mutually agreed and endorsed by the employer and Apprentice/Trainee? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Training Plans provided to students.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 6.15 – 6.20**  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_RECTIFICATION_PLAN) *where you’ve outlined the actions to address these issues)* | |

### [15. Training and assessment](#_Accounts_and_Records)

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| 15.1 Amount of training | | |
| **Considerations** | 15.1.1 Do you ensure that the amount of training of each program is in line with clauses 1.1 and 1.2 of Standard 1 of the National RTO Standards? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clause 7.1**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

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| 15.2 Training delivery | | |
| **Considerations** | 15.2.1 Do you ensure that all training and assessment is delivered in line with the relevant Training Plan and TAS?  15.2.2 If a subject is assessed in the workplace, do you visit the student’s workplace to carry out the assessment?  15.2.3 Do all materials used in online training and assessment comply with the Web Content Accessibility Guidelines 2.0?  15.2.4 Do you comply with:   * the Act and the Guidelines About Apprenticeship/Traineeship Training Delivery for training delivered to Apprentices/Trainees? * requirements set by the Nursing and Midwifery Board of Australia, including only delivering an ‘Approved Program of Study’, for delivery of the Diploma of Nursing?   15.2.5 Do you ensure that you issue certificates or statements of attainment in line with the specifications of:   * the relevant accredited courses and Training Packages; and/ or * any other applicable guidelines, regulations or legislation (including the Guidelines About Apprenticeship/Traineeship Training Delivery for completions by Apprentices/Trainees)? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Confirmation of your approval from NMBA and the ANMC.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 7.2 – 7.6**  [**Guidelines About Apprenticeship/Traineeship Training Delivery**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### [16. Practical Placements](#_Accounts_and_Records)

If N/A, proceed to [17. Evidence of Participation](#_17._Evidence_of)

|  |  |  |  |
| --- | --- | --- | --- |
| 16.1 Practical Placements | | | |
| **Considerations** | 16.1.1 Do you ensure that students undertaking Practical Placements have a written Practical Placement Agreement?  16.1.2 Before the commencement of the practical placement, is each Practical Placement Agreement signed by the:   * You; * employer or organisation hosting the practical placement; and * student?   16.1.3 Do you ensure that all Practical Placement Agreements include the required minimum information?  16.1.4 Is each Practical Placement sufficient and appropriate to meet the vocational outcomes of the subjects?  16.1.5 Do you ensure that Practical Placements are conducted in accordance with the most recent Practical Placement Guidelines? | | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Templates of your Practical Placement Agreement.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 8.1 - 8.5**  [**Guidelines issued by the Department of Education and Training Victoria for Registered Training Organisations and Employers in relation to Post-Secondary Students undertaking Practical Placements (updated Practical Placement Guidelines) as at 10 April 2017**](https://www.education.vic.gov.au/Documents/training/providers/rto/practicalplacementguidelines.pdf)  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **The Guidelines include a template for Practical Placement Agreement, and Training Providers are highly recommended to use this template.** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### [17. Evidence of Participation](#_Accounts_and_Records)

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| --- | --- | --- | --- |
| 17.1 Evidence of Participation | | | |
| **Considerations** | 17.1.1 Do you meet the Contract requirements for Evidence of Participation (EOP)?  17.1.2 Do you retain:   * Valid EOP that contains the Skills First Student's name or client identifier; a subject identifier; and a date expressed in day/month/year format? * one point of valid EOP dated within (but not before) the reported Activity Start Date, for subjects with a duration of 30 days or fewer? * two different points of valid, with one point no later than 30 days after the reported Activity Start Date, and one point within no earlier than 30 days before (and no later than) the reported Activity End Date, for subjects with a duration more than 30 days? * two different items of valid EOP for subjects where the period between the Activity Start Date and Activity End Date for the subject is more than 30 days?   17.1.3 Do you record how, when and why a student is withdrawn? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of your internal audit.* | | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 9.1 – 9.11**  *Always refer to your relevant Contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **Common Audit Finding: The minimum points of valid EOP are missing.** | |
|  | **Conduct an audit of government subsidised student files to ensure evidence of participation is available and retained for audit (including one to two pieces as required).** | |
|  | **Withdrawn Subject Enrolments Factsheet** | |
|  | **Withdrawn (and Deferred) Program Enrolments Factsheet** | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | | |

### [18. Reporting training activity, government-subsidised tuition fees and other information](#_Accounts_and_Records)

|  |  |  |
| --- | --- | --- |
| 18.1 Reporting training activity, government-subsidised tuition fees and other information | | |
| **Considerations** | 18.1.1 Do all staff who are responsible for reporting training delivery understand the requirements for statistical reporting?  18.1.2 Do you submit Student Statistical Reports at least once every calendar month per data collection year?  18.1.3 If the data is incorrect in the Student Statistical Reports, do you ensure correct data is resubmitted by no later than the following month?  18.1.4 Do you have processes in place to ensure that your CEO (or their nominee) certifies that the data is complete and accurate?  18.1.5 Do you ensure that the hourly tuition fee reported to SVTS is consistent with the hourly tuition fee recorded on the Statement of Fees and your invoice?  18.1.6 Do you comply with the reporting requirements for the Victoria Student Number (VSN)?  18.1.7 Do you report Literacy Support Units using the LNSUPPORT program code?  18.1.8 Do you ensure withdrawals are reported by the earlier of two months after the point of withdrawal or the final data submission date for the data collection year?  18.1.9 Do you ensure that in each calendar year into which the Term extends, you collect and submit relevant data for each student that commences, completes or withdraws from a qualification in Domain A and Domain B of the Foundation Skills List? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clause 10**  **Victorian VET Student Statistical Guidelines**  [**Victorian Training Guarantee Literacy and Numeracy Support Implementation Guide (Version 2, June 2018)**](https://www.education.vic.gov.au/Documents/training/providers/rto/currlnsupportlitnum.pdf)  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### [19. Determining and paying Funds](#_Accounts_and_Records)

|  |  |  |
| --- | --- | --- |
| 19.1 Fee Concession / Fee Waiver Contribution | | |
| **Considerations** | 19.1.1 Do you calculate the fee to be charged to students with a valid concession? Is this in accordance with the Contract and Guidelines about Fees?  19.1.2 Do you ensure that you properly calculate the Fee Waivers/Exemptions Contribution payable for Free TAFE for Priority Courses? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Schedule 1, Clauses 11.5 – 11.8**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

|  |  |  |
| --- | --- | --- |
| 19.2 Payment of Funds | | |
| **Considerations** | 19.2.1 Do you ensure that Funds received from the Department are used for the provision of the Training Services in respect to the specific Eligible Individual?  19.2.2 Do you verify and confirm the following information before a Student Statistical Report is lodged:   * the Scheduled Hours of supervised training and assessment; and * that Evidence of Participation is available for each student to support the Funds being claimed? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Clause 8.2**  **Schedule 1, Clauses 11.9 – 11.11**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

### 20. Programs and initiatives

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| --- | --- | --- |
| 20.1 Conditions | | |
| **Considerations** | 20.1.1 Do you have arrangements in place for carrying out your role and responsibilities under the initiatives outlined in Part C, Schedule 1 of the Contract?  20.1.2 Have you incorporated the compliance requirements for any new initiatives or updates to existing initiatives? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses** | **Schedule 1 Part C Clauses 13 – 18.8 for Standard Contract**  **Schedule 1 Part C Clauses 13 – 17.17 for Non-VIC Contract**  **Schedule 1 Part C Clauses 13 – 19.9 for TAFE and Dual Sector Contracts**  [**Guidelines About Determining Student Eligibility and Supporting Evidence**](https://www.education.vic.gov.au/training/providers/funding/Pages/serviceagree.aspx?Redirect=1#link85)  *Always refer to your relevant Contract type for specific detail* | |
| **Actions if non-compliant** | *(List the relevant sections in your* [*Rectification Plan*](#_Rectification_plan) *where you’ve outlined the actions to address these issues)* | |

## Rectification plan

|  |  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| # | Clause/ Reference # | Clause / Reference Detail | Internal Audit Findings | Root Cause | Rectification Actions / Improvement Measures | Responsible Officer | Expected Completion Date | Management Sign off-upon Completion | Actual Completion Date |
| 1 |  |  |  |  |  |  |  |  |  |
| 2 |  |  |  |  |  |  |  |  |  |
| 3 |  |  |  |  |  |  |  |  |  |
| 4 |  |  |  |  |  |  |  |  |  |
| 5 |  |  |  |  |  |  |  |  |  |
| 6 |  |  |  |  |  |  |  |  |  |
| 7 |  |  |  |  |  |  |  |  |  |
| 8 |  |  |  |  |  |  |  |  |  |
| 9 |  |  |  |  |  |  |  |  |  |
| 10 |  |  |  |  |  |  |  |  |  |

## Sample rectification plan

| # | Clause/ Reference # | Clause / Reference Detail | Internal Audit Findings | Root Cause | Rectification Actions / Improvement Measures | Responsible Officer | Expected Completion Date | Management Sign off-upon Completion | Actual Completion Date |
| --- | --- | --- | --- | --- | --- | --- | --- | --- | --- |
| SAMPLE ONLY | | | | | | | | | |
| **1** | **Clause 4.9 (c)** | The Training Provider must: ensure that all persons employed or engaged by the Training Provider to provide the Training Services are aware of all obligations under this VET Funding Contract as appropriate. | Not all staff members were aware of Contract Notifications. | Only one staff member had an SVTS log in and therefore all Contract Notifications were retained by the Office Manager and not circulated to all staff. | 1. Train the two staff members in the content of the VET Funding Contract specifically how it impacts on their roles. 2. Staff induction package to include information relating to the VET Funding Contract and all Contract Notifications. | Office Manager | 8/08/2021 | M Anderson | 30/06/2021 |
| **2** | **Schedule 1, Clause 3.3** | Relevant evidence is to be sighted by the Training Provider and a copy of the relevant evidence retained for each Eligible Individual, prior to commencement in training, in accordance with the Guidelines about Determining Student Eligibility and Supporting Evidence. | Insufficient eligibility evidence on file. | The student did not submit the required documentation during enrolment and withdrew prior to program commencement. This student did not commence the training. | 1. Management have investigated this event and have updated the business process to ensure all eligibility documentation have been submitted prior to updating the Student Management System (SMS). 2. Additionally, a checklist has also been developed and is required to be signed off by the Enrolment Officer prior to entering the SMS. | Enrolment Officer  Office Manager | 15/02/2021 | M Anderson | 15/02/2021 |
| **3** | **Schedule 1, Clause 4.10** | The Training Provider must ensure that all mandatory standard enrolment questions as described in the Victorian VET Student Statistical Collection Guidelines, together with any directions of the Department, are applied during the enrolment process of all Eligible Individuals | The Institute's Enrolment Form was missing the following questions: *Do you consider yourself to have a disability, impairment or long-term condition?* and, *What is your COMPLETED school level?* | The sampled enrolment form had been modified by the individual faculty using a previous template. | 1. Produce a new version of the enrolment form and circulate to all staff requesting that the new version be used from now on. 2. Policy document has been updated to ensure that any subsequent updates to enrolment forms are recorded as a new version and circulated to all staff. When new enrolment forms are circulated, all previous versions to be destroyed. | Compliance Officer | 8/08/2021 | M Anderson | 30/06/2021 |
| **5** | **Schedule 1, Clause 4.4** | The Training Provider must document why it determined the program or qualification each Eligible Individual enrolled in was a suitable, and the most suitable, training option for that Eligible Individual, with reference to the information obtained through consideration of the items in Clause 5.1 of this Schedule 1. | The review of random student files has identified five instances where the Teacher had not provided the rationale as to why the program was the most suitable for the student. | An interview with the Teacher was performed who explained that they were unaware that section was required as the students had completed the expectations from the program. | 1. A refresher course for all trainers was provided on 15/05/2020 to ensure trainers are aware of the Contract requirements. | Trainer Coordinator | 15/05/2021 | M Anderson | 15/05/2021 |
| **4** | **Schedule 1, Clause 6.11** | The Training Provider must ensure that the Training Plan for non-Apprentice/Trainee Skills First Students aligns with the relevant Training and Assessment Strategy (TAS) and that any variation from the TAS is documented and justified. | The correct subject codes on the Training Plan for Certificate III in Food Processing did not align with the applicable TAS. | The Training Plan template used was outdated and used old subject codes. | 1. The Training Plan template and our SMS have been reviewed and the information updated to ensure the correct codes will be used. It will be ready for implementation in September 2021. | Training Coordinator | 30/09/2021 | M Anderson | 30/09/2021 |
| **5** | **Schedule 1, Clauses 9.1 and 9.2** | All Training Services delivered by the Training Provider to an Eligible Individual must be supported by Evidence of Participation. | A review of all current year’s completed student files showed that all EOP was documented and filed as required. However, there were one instance where the EOP (work completed on assessment day) was dated one day after the Activity End Date. | The student had endorsed the wrong date on the assessment paper. However, the attendance sheet was dated correctly. | 1. A notification memo was provided to all trainers to ensure the following information were correct prior to signing off the assessment paper:  * Name of student * Student ID * Signature * Date of completion  1. A refresher course for all trainers on the Contract requirement is scheduled in September 2020. | Trainer Coordinator | 30/09/2021 | M Anderson | 30/09/2021 |
| **4** | **Schedule 1, clause 9.6 (b)** | 9.6 b) if the period between the Activity  Start Date and Activity End Date for  the subject is more than 30 days  iii) the two points of Evidence of Participation provided must be two different items of evidence as specified in Clause 9.7 of this Schedule 1. | Through a student file review, it was identified that one teacher was only retaining attendance roles and other pieces of evidence were being returned to students and not copied/retained. | The Teacher did not know that two forms of EOP were required to be retained for subjects longer than one month. | 1. A meeting is to occur with all Teachers informing of them of the changes to the collection of evidence of participation. 2. The data entry officer is responsible for verifying evidence is available before a claim is made. 3. Students will be contacted to ask for a copy of their assignments to be returned. 4. Inaccurate information reported to SVTS is to be rectified and claims reversed in instances where insufficient evidence has been retained. | Compliance officer  Teacher | 2/03/2021 | M Anderson | 21/03/2021 |

## CEO Endorsement

|  |  |
| --- | --- |
| ENDORSEMENT | |
| **Training Provider Trading Name** |  |
| **Training Provider Legal Name** |  |
| **TOID** |  |
| **Date of Contract Commencement** |  |
| **IAC Conducted By** |  |
| **Date/s Internal Audit Conducted** |  |
| *I certify that this Internal Audit Checklist has been completed in accordance with the requirements of the VET Funding Contract* Skills First *Program. In particular, the internal audit was completed on or before 30 June 2021.  I acknowledge that the non-compliances identified through the Internal Audit Checklist will be addressed in the rectification plan.* | |
| **Certified by the Chief Executive Officer (or equivalent) as an accurate appraisal of the Training Provider’s compliance with the provisions of the VET Funding Contract, including the rectification plan where applicable.** | **Name** |
| **Role** |
| **Signature** |
| **Date** |