**2024 SKILLS FIRST INTERNAL AUDIT TOOL**

**VERSION 1**

Terminology in this document

* we’, ‘us’ or ‘our’ means the Department of Jobs, Skills, Industry and Regions
* ‘you’ or ‘your’ means a training provider that holds a 2024-25 VET Funding Contract

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## What is the Internal Audit Tool?

The Internal Audit Tool (IAT) is a self-assessment tool that you are required to complete each year to check how you are meeting your obligations under the 2024-25 VET Funding Contract (the contract).

## How do I use it?

The IAT 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.

The IAT is designed to help you recognise and resolve compliance issues within your organisation, and ensure you’re meeting the obligations of the contract to provide quality training suitable for your students.

The IAT 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 IAT 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 Skills Victoria Training System (SVTS).Why do I need to complete an IAT?

It is a contract requirement that within 6 months of the commencement date, you must:

* conduct an annual internal audit of your compliance with the contract (clause 11.4);
* have the completed IAT 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.

## Instructions

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

### Sections

The IAT 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 in the documents section of SVTS, and on our [website](https://www.vic.gov.au/vet-funding-contracts#page-component-2695030).

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

| Icon | Description |
| --- | --- |
| Icon  Description automatically generated | Suggestions for improving compliance. |
| Icon  Description automatically generated | Fact sheets, templates and other guidance documents to assist you. All documents are published on SVTS. |
|  | Websites to assist |
| Icon  Description automatically generated | 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 compliant but there are some minor issues you need to further investigate, we recommend that you tick non-compliant. 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.

## IAT Overview

|  |  |
| --- | --- |
| Section title | Section details |
| 1. Your general obligations | 1.1 Maintain registration and standards  1.2 Requirements for Skills First teachers  1.3 Comply with Laws  1.4 Comply with our directions and policies  1.5 Act ethically  1.6 Be accountable |
| 2. Scope of the training services | 2.1 Funded scope  2.2 Commencement and program allocations (standard contract only)  2.3 Foundation skills approved provider list |
| 3. Subcontracting | 3.1 Subcontracting of pre-training review  3.2 Subcontracting of training and assessment and subcontracting generally |
| 4. Reporting and information | 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 | 5.1 GST |
| 6. Records | 6.1 Record keeping requirements  6.2 Security and integrity of records  6.3 Accounting records  6.4 Electronic signatures |
| 7. Audit, review and investigation | 7.1 Audits, reviews and investigations by us  7.2 Internal audits |
| 8. Confidentiality and Privacy | 8.1 Confidentiality and privacy |
| 9. Liability, indemnity and insurance | 9.1 Liability, indemnity and insurance |
| 10. Student information and protection | 10.1 Marketing and recruiting students  10.2 Promotional materials  10.3 Your website and the Victorian Skills Gateway |
| 11. Skills First eligibility | 11.1 Eligibility requirements and exemptions  11.2 Additional eligibility requirements for apprentices and trainees  11.3 Additional eligibility requirements for individuals under 17 years of age |
| 12. Assessing and evidencing eligibility | 12.1 Assessing and evidencing eligibility |
| 13. Pre-Training Review and enrolment requirements | 13.1 Pre-training review  13.2 Enrolment requirements |
| 14. Tuition and other fees | 14.1 Tuition and other fees |
| 15. Planning for training and assessment | 15.1 Training and Assessment Strategy  15.2 Training plan requirements (non-apprentice/trainee Skills First students)  15.3 Training plan requirements (apprentices/trainees) |
| 16. Training and assessment | 16.1 Amount of training  16.2 Training delivery |
| 17. Practical Placements | 17.1 Practical placements |
| 18. Evidence of Participation | 18.1 Evidence of participation |
| 19. Reporting training activity, government-subsidised tuition fees and other information | 19.1 Reporting training activity, government-subsidised tuition fees and other information |
| 20. Determining and paying funds | 20.1 Fee concession / fee waiver contribution  20.2 Payment of funds |
| 21. Programs and initiatives | 21.1 Conditions |
| Rectification plan template | |
| SAMPLE rectification plan | |
| CEO endorsement | |

## 2024 IAT

## 1. Your [g](#_Scope_and_Provision)eneral obligations

|  |  |  |  |
| --- | --- | --- | --- |
| 1.1 Maintain registration and standards | | | |
| **Considerations** | 1.1.1 Do you have a process to notify the us immediately if your registration is suspended or cancelled?  1.1.2 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? * comply with the applicable regulatory standards?   1.1.3 Do you comply with the Fair Jobs Code? | **Self-assessed status** | |
| Compliant  Non-compliant | |
| **Findings**  Icon  Description automatically generated | *(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**  Icon  Description automatically generated | **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 where you’ve outlined the actions to address these issues)* | | |
| **1.2 Requirements for Skills First teachers** | | | |
| **Considerations** | 1.2.1 Do all your Skills First teachers hold the relevant qualifications as required by the applicable regulator?  1.2.2 Are any of your Skills First teachers engaged through a subcontracting arrangement? If so, do you have our written approval of the arrangement?  1.2.3 Are your Skills First teachers aware that we may, at our discretion, require them to undergo training or professional development?  1.2.4 Do you keep and maintain sufficient records of Skills First teachers responsible for delivering each subject in programs delivered under the contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Skills First teacher files.* * *Position descriptions and program delivery of your teachers.* * *Documentation on subcontracting arrangements, e.g., copies of agreements.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 4.2 – 4.5 and clause 6**  *Always refer to your relevant contract type for specific detail* | | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 you meet your legal obligations? Including but not limited to the following:   * occupational health and safety laws; * the Australian Consumer Law; * privacy laws; * anti-discrimination and equal opportunity laws; * the Disability Act 2006 (Vic); * the Working With Children Act 2005 (Vic); * the Charter of Human Rights and Responsibilities Act 2006 (Vic) [as though you are a public authority within the meaning of section 4(c) of this legislation, including not acting in a way that is incompatible with a human right protected by it or, when making a decision about performing the training services, failing to properly consider such a human right]; and * the Child Wellbeing and Safety Act 2005 (Vic) | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Compliance tracking record of regulatory standards* * *Any material that outlines these requirements, such as a staff induction program or handbook.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 4.6**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **1.4 Comply with our directions and policies** | | |
| **Considerations** | 1.4.1 What process do you have in place to monitor announcements, contract notification, memos and documents relating to VET Fundings Contracts on SVTS?  1.4.2 How do you circulate the above to all relevant staff?  1.4.3 Do you have a process in place to comply with the Skills Firstquality charter? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of staff meeting minutes or all staff emails where new contract notifications and executive memoranda are circulated or discussed.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 4.7**  [**Quality charter**](https://www.education.vic.gov.au/Documents/training/providers/rto/Skills_First_Quality_Charter_Final.pdf)  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **1.5 Act ethically** | | | |
| **Considerations** | 1.5.1 Do you uphold the objectives of the Skills First program?  1.5.2 Are your staff aware of their ethical obligations in their dealings and conduct in providing training services? This includes that they cannot offer any person or organisation an incentive to encourage them to undertake government-subsidised training with you?  1.5.3 How do you ensure that you do not engage, employ, contract or otherwise deal with any disallowed person in connection with the contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of staff handbook or other materials outlining values of the organisation.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 3 and 4.8**  [**Quality charter**](https://www.education.vic.gov.au/Documents/training/providers/rto/Skills_First_Quality_Charter_Final.pdf)  *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 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, contract, and any changes to the contract as announced from time to time via contract notifications?  1.6.2 Are there appropriate compliance, reporting and auditing frameworks and controls, including segregation of duties, for the provision of training services and receipt of the funds?  1.6.3 Do you have processes in place to ensure you don’t infringe on the intellectual property rights of the State or any other person?  1.6.4 Do you have a process in place to ensure that the CEO is available at all reasonable times to communicate with the us?  1.6.5 Is there a plan in place to delegate the responsibilities in the absence of the CEO? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and Guidelines clauses**  Icon  Description automatically generated | **Clause 4.9 and 4.11**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 2. Scope of the training services

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| **2.1 Funded scope** | | |
| **Considerations** | 2.1.1 Do you have a policy and process in place to monitor your funded scope, as we may from time to time, add or remove programs from your funded scope? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 5.1 – 5.2**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **2.2 Commencement and program allocations (standard contract only)** | | |
| **Considerations** | 2.2.1 How 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *SVTS report. SVTS > Contracts > Contract Commencements Allocations >> Skills Sets and AQF qualifications* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 5.3 – 5.9 for standard contract only**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **2.3 Foundation skills approved provider list** | | |
| If N/A, proceed to 3.1 Subcontracting of pre-training review | | |
| **Considerations** | 2.3.1 Does you inform staff whether you’re included in the foundation skills approved provider list? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 5.10 – 5.11 for standard contract**  **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**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 3. Subcontracting

If you don’t subcontract any of the training services, select ‘n/a’ and proceed to 4, reporting and information.

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| --- | --- | --- |
| **3.1 Subcontracting of pre-training review** | | |
| **Considerations** | 3.1.1 Do you ensure that no aspect of the pre-training review is subcontracted? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 6.3**  *Always refer to your relevant contract type for specific detail*  **Guide to subcontracting** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **3.2 Subcontracting of training and assessment and subcontracting generally** | | | |
| **Considerations** | 3.2.1 Do you ensure that subcontracting arrangements meet the requirements of the contract?  3.2.2 Do you have a process for ensuring that subcontracting arrangements for training and/or assessment are approved by us?  3.2.3 How 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?  3.2.4 Do you ensure that all subcontractors have appropriate qualifications and are suitably experienced and capable of providing training services as required by the contract?  3.2.5 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**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of the written approval from us.* * *Copies of the agreement used between your organisation and subcontractors or the list of subcontracting arrangements you provided to us.* * *Copies of the relevant qualifications and/or resumes of the subcontractors.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 6.4 – 6.10**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources** | Icon  Description automatically generated | **Guide to subcontracting** | |
| **Actions if non-compliant** | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 

## 4. Reporting and information

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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?  4.1.2 What process do you have in place to ensure accurate and complete reporting to us about training services? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of release notes (or similar) from your SMS vendor advising of any updates to the system.* | |
| **Contract and guidelines clauses** | **Clause 7.1**  **The Victorian VET student statistical collection guidelines**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 we are 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**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 7.2**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Reporting brokering services form** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 we are notified of any proposed change in control at least 20 business days before the change takes effect?  4.3.2 Do you have a process to ensure that any person/s taking over control of you are made aware that we may, at our sole discretion, object to the change in control, and may terminate the contract if you undergo (or have undergone) the change in control. | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 7.3 - 7.4**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact sheet: Change in control** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 us:   * of significant changes to your other VET Funding arrangement(s), e.g. restrictions or reductions in scope, termination, etc? * of any significant change to your ownership, CEO and/or operations? * of your shares or other securities being listed on a stock exchange (where you haven’t notified us as part of a change in control notification under clause 7.3)? * if, at any time when your shares are listed on a stock exchange, any disallowed person obtains at least 35% of your voting power or obtains control of you? * if your Fair Jobs Code Pre-Assessment Certificate is revoked or lapses. | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 7.5 - 7.9 for standard contract**  **Clauses 7.5 - 7.7 for TAFE and dual sector contracts**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated |  | **Outline the position/s within your organisation with the responsibility for ensuring we are informed about these events.** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *A copy of your ABN.* * *Evidence demonstrating your GST registration.* * *Screen shot of Australian Business Register (ABR) reflecting ABN and GST status (abr.business.gov.au/).* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 9.2 and 9.5**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 6. Records

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| --- | --- | --- | --- |
| **6.1 Record keeping requirements** | | | |
| **Considerations** | 6.1.1 Do you have a policy and process in place to ensure that:   * complete and accurate records (hard copy or electronic form) 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 or any other applicable law? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 10.1 – 10.8**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact sheet: Recordkeeping requirements** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

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| **6.2 Security and integrity of Records** | | | |
| **Considerations** | * + 1. What process have you put in place to ensure: * that all records are stored securely from unauthorised access or use? * Records that include personal information are disposed of in line with PDP Act?   + 1. When you identify the need to amend a record, do you have processes in place to ensure: * Records are not amended in such a way that they are not accurate? * Amendments are documented in a way that a reasonable person could ascertain the nature of and rationale for the amendment in a straightforward way including annotating when, and by whom, the amendment was made? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 10.9 – 10.10**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact sheet: Recordkeeping requirements** | |
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| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 have appropriate processes and controls in place for administration of funds?  6.3.2 Do you have a complete record of all financial dealings with the contract, which can be audited by the Auditor-General of Victoria, or any other entity as directed by us? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 10.11**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **6.4 Electronic signatures** | | | |
| **Considerations** | 6.4.1 When using an electronic action by a person that is equivalent to a signature, do you ensure it is done in accordance with the requirements set out in the contract? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 10.14 – 10.15**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact sheet: using electronic signatures** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 7. Audit, review and investigation

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| **7.1 Audits, reviews and investigations by us** | | |
| **Considerations** | 7.1.1 Do you have a process in place to prepare for an audit when notified and to respond to items identified at audit?  7.1.2 Do you have a process for implementing a Management Action Plan (MAP) and notifying us in writing, (within 6 months of receipt of the audit recommendations), of your compliance with, and implementation of, the recommendations and/or MAP? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 11.1 - 11.3**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 have a process in place to conduct an annual internal audit within 6 months of the contract commencement date, and again during 2025?  7.2.2 Have you documented a timeframe for the actions on your rectification plan to be completed? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Your internal audit report and rectification plan.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 11.4 - 11.7**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 8. Confidentiality and privacy

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| **8.1 Confidentiality and privacy** | | |
| **Considerations** | 8.1.1 Do you have a policy to ensure the information regarding this contract (including details of the funds paid for any individual) or any of our confidential information is not disclosed except as permitted under the contract?  8.1.2 Do you have processes to ensure that all necessary consents are obtained when collecting any personal information for the purposes of the contract, in accordance with all applicable laws?  8.1.3 Do you have processes to ensure you notify us of any:   * breach of the privacy clauses of the contract (12.5 – 12.7), * unauthorised disclosure, use, modification or access, attempted unauthorised disclosure, use, modification or access, or misuse or loss of any Personal Information collected or held for the purposes of this Contract; or * act or practice of yours which causes us to fail to comply with our obligations under the PDP Act or the Health Records Act? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clauses 12.1 – 12.8**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 9. Liability, indemnity and insurance

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| **9.1 Liability, indemnity and insurance** | | |
| **Considerations** | 9.1.1 Do you have current and valid insurance cover for:   * workers compensation; * public liability; * professional liability/indemnity; and * property?   9.1.2 Have you kept your evidence of insurance cover and can provide it to us on request? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(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**  Icon  Description automatically generated | **Clauses 13.1 – 13.7 for standard and dual sector contracts**  **Clauses 13.1 – 13.5 for TAFE contracts**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 10. Student information and protection

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| **10.1 Marketing and recruiting students** | | |
| **Considerations** | 10.1.1 Does your marketing of the programs on the funded scope 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.* * *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 where you’ve outlined the actions to address these issues)* | |

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| **10.2 Promotional materials** | | |
| **Considerations** | 10.2.1 Does your promotional material relating to Skills First training meet the requirements of the contract?  10.2.2 Does it acknowledge that the training services are provided with funds made available by the Victorian and Commonwealth governments?  10.2.3 Does it identify the legal entity and/or registered business name and TOID? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(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**  Icon  Description automatically generated | **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 where you’ve outlined the actions to address these issues)* | |

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| **10.3 Your website and the Victorian Skills Gateway** | | | |
| **Considerations** | 10.3.1 Do you ensure that you publish in a prominent place on your website:   * standard tuition fees for Skills First subsidised training for each program you deliver and any other relevant fees? * a list all providers of brokering services? * where there is a subcontracting arrangement for training and assessment, the identity of the subcontractor and the respective roles of you and the subcontractor? * your complaints and appeals process?   + 1. Do you maintain an up-to-date profile on the Victorian Skills Gateway? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A printout of your web page including URL.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 1.3 - 1.4**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated |  | [**Victorian Skills Gateway**](https://www.skills.vic.gov.au/s/) | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 11. Skills First eligibility

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| **11.1 Eligibility requirements, exemptions and exclusions** | | | |
| **Considerations** | 11.1.1 Do you ensure that your relevant staff understand and apply the student eligibility criteria (including the eligibility exemptions and exclusions detailed in clause 2 of schedule 1 of the contract), for Skills First funding when conducting eligibility assessments?  11.1.2 Have you incorporated the guidelines about eligibility as well as all relevant eligibility exemptions and exclusions into your eligibility assessment process? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings** | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copy of the results from your internal review of eligibility forms* | | |
| **Contract and guidelines clauses** | **Schedule 1, clauses 2.2 – 2.5 and 2.11 – 2.12**  **Guidelines about eligibility**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources** |  | **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?** | |
| Icon  Description automatically generated | **Fact Sheet: Student eligibility for** **Skills First** | |
| Icon  Description automatically generated | **Fact sheet: Sighting and retaining evidence of eligibility** | |
| Icon  Description automatically generated | **Fact sheet: Understanding skill sets** | |
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| **Actions if non-compliant** | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

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| **11.2 Additional eligibility requirements for apprentices and trainees** | | |
| If N/A because you don’t deliver apprenticeships or traineeships, proceed to 11.3 Additional eligibility requirements for individuals under 17 years of age | | |
| **Considerations** | 11.2.1 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clause 2.6**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **11.3 Additional eligibility requirements for individuals under 17 years of age** | | | |
| If N/A, proceed to 12. Assessing and evidencing eligibility | | | |
| **Considerations** | 11.3.1 Do you ensure that the students under 17 years of age, (not applicable for school based apprenticeship or traineeship):   * have received an exemption from school attendance; and * participate in training on a full-time basis, or combination of training and employment?   11.3.2 Do you have a procedure in place to ensure that evidence of the exemption from school attendance meets the requirements of the contract and the guidelines about eligibility? This includes the retention of evidence.  11.3.4 Do you have a procedure in place to ensure that you notify the relevant regional office and the student’s previous school if they stop attending training (and are still under 17 years of age)? | | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of the evidence of exemption from school attendance.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 2.7 – 2.10**  **Guidelines about eligibility**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact sheet: Enrolling students under 17** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 12. Assessing and evidencing eligibility

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| **12.1 Assessing and evidencing eligibility** | | |
| **Considerations** | 12.1.1 Do you have clear and documented processes for determining students’ eligibility for Skills First?  12.1.2 Do you ensure that you only enrol eligible students in Skills First?  12.1.3 How do you ensure that all questions prescribed by is in the guidelines about eligibility, have been completed and documented?  12.1.4 Do you have a process to ensure all relevant information and evidence of eligibility assessment are kept on the student’s file and are available for audit? This includes:   * documenting any eligibility exemptions granted; and * for students enrolled in disability-specific programs, appropriate evidence of a permanent cognitive impairment or intellectual disability? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Copy of your internal audit.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 3.1 - 3.5**  **Guidelines about eligibility**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## [13.](#_Accounts_and_Records) Pre-training review and enrolment requirements

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| **13.1 Pre-training Review** | | | |
| **Considerations** | 13.1.1 Do you have a clear and documented business process for conducting pre-training reviews that is consistent with the objectives in clause 3 of the contract?  13.1.2 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 (including through RPL, recognition of current competency (RCC) or credit transfer)? * consider the student’s   + existing educational attainment and capabilities?   + literacy and numeracy skills   + digital capability, where proposed learning includes portions delivered online; * identify whether 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 – 4.7**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources** | Icon  Description automatically generated | **Conduct an audit of government subsidised student files. Are the PTR forms complete? Is all the evidence of the individual’s objectives for training and competencies previously acquired documented? Is there evidence to support the decision that the program is suitable and the most suitable for each student?**  **Skills First pre-training review template** | |
| Icon  Description automatically generated | **Fact sheet: How to consider literacy and numeracy skills** | |
|  | **The VDC conduct workshops on planning and delivering suitable and appropriate training and good practice literacy and numeracy (LN) assessments. VDC workshops can be found in the 'Documents' section of SVTS. It can also be access through the** [**website**](https://vdc.edu.au/)**.** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

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| **13.2 Enrolment requirements** | | | |
| **Considerations** | 13.2.1 Do you have a process in place to ensure that prior to enrolling a prospective student, they are informed that their enrolment is under the Skills First program and how it will impact their future Skills First entitlement?  13.2.2 How do you ensure that your enrolment processes include asking all mandatory enrolment questions from the Victorian VET student statistical collection guidelines?  13.2.3 Do your enrolment forms include a standard privacy notice which advises individuals how their data may be supplied to, and used by, us and Commonwealth VET Student Loan agencies?  13.2.4 How do you advise students about the possibility of being contacted by NCVER or us, including to request their participation in:   * an NCVER survey; * our annual student outcome survey; and/or * our audit, review or investigation processes.? | **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**  **Victorian VET Student statistical collection guidelines**  *Always refer to your relevant contract type for specific detail* | | |
| **Actions if non-compliant** | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 14. Tuition and other fees

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| **14.1 Tuition and other fees** | | |
| **Considerations** | 14.1.1 Do you ensure that correct fees and charges are calculated and levied to students each year as per the current guidelines set out in the contract and any contract notifications?  14.1.2 Does your statement of fees include all the minimum information required for the enrolment?  14.1.3 How do you determine whether individuals are eligible to receive a concession or fee waiver?  14.1.4 Do you have a process in place to collect and maintain evidence to support your application of fee concessions and fee waivers for each student, as required under the guidelines about fees?  14.1.5 Do you have a system and process to report the student’s eligibility for a fee concession/fee waiver that you’ve granted?  14.1.6 Do you have a documented process for granting a grace period for providing evidence of concession (if you allow grace periods)? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Your template for calculating fees and charges.* * *Copies of invoices issued to students.* * *Your Statement of Fees* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 5.1 and 5.2**  **Guidelines about Fees**  *Always refer to your relevant contract type for specific detail* | |
| **Tips / Useful Resources**    **Actions if non-compliant**  Icon  Description automatically generated | *Conduct an audit of government subsidised student files. Is all the evidence to support your application of fee concessions and fee waivers for each student documented?*  *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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

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| **15.1 Training and Assessment Strategy** | | | |
| **Considerations** | 15.1.1 Do you have a Training and Assessment Strategy (TAS) for each program and for each cohort of students the program will be delivered to, 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.   15.1.2 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?  15.1.3 Do you have a clear and documented business process to systematically review and evaluate each TAS? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Copies of your TAS.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **User guide to Standards for RTOs – chapter 4**  **Schedule 1, clauses 6.1 - 6.3**  *Always refer to the relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **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**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

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| **15.2 General training plan requirements (non-apprentice/ trainee Skills First students)** | | |
| **Considerations** | 15.2.1 Is the information in the training plan:   * consistent with the programs/subjects to be attained? * customised as required for the needs of the individual? * aligned to the relevant TAS?   15.2.2 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?  15.2.3 What is the process in place to ensure that the training plan is provided to Skills First students either before training commencement, or no later than four weeks after training commencement?  15.2.4 If the student is participating in training conducted in a workplace where they are employed, is the training plan agreed to and signed by the employer?  15.2.5 Do your training plans meet the requirements set out in the contract?  15.2.6 Do you ensure that the training plan is updated according to any changes that occur during the delivery of training and/or assessment and ensure the changes are communicated to the student as soon as practicable? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Training plans provided to non-apprentice/ trainee Skills First students.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses and 6.4 – 6.13**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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| **15.3 Training Plan requirements (Apprentices/ Trainees)** | | |
| If N/A, proceed to 16. Training and assessment | | |
| **Considerations** | 15.3.1 Do you have a process in place to jointly develop the training plans with the employer and the apprentice/trainee?  15.3.2 Are the training plans:   * aligned with the relevant TAS, or document and justify any variation from the TAS; * vocationally relevant; * reflective of industry requirements; and * supported by appropriate work within the workplace?   15.3.3 Do you ensure that the training plan is signed (and dated) by you, the employer and the apprentice/trainee (and the school in the case of a school-based apprenticeship/traineeship)?  15.3.4 Do you ensure that the training plan is provided to all parties either before training commencement, or no later than four weeks after training commencement.  15.3.5 Does the content of the training plan (apprentices/ trainees) align with requirements set out in the contract?  15.3.6 Do you have a process to regularly review the training plan and ensure it reflects the current status of the Apprentice's or Trainee’s training, so that the training plan can facilitate competency based progression and completion?  15.3.7 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* * *Training plans provided to students.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 6.14 – 6.20**  **Guidelines about apprenticeship/traineeship training delivery**  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 16. Training and assessment

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| **16.1 Amount of training** | | |
| **Considerations** | 16.1.1 How 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence** | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **User guide to standards for RTOs – chapter 4**  **Schedule 1, clause 7.1**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

|  |  |  |
| --- | --- | --- |
| **16.2 Training delivery** | | |
| **Considerations** | 16.2.1 What process do you have in place to ensure that all training and assessment is delivered in line with the relevant training plan and TAS?  16.2.2 What process do you have in place to ensure that all training and assessment is delivered in compliance with regulatory standards and the assessment requirements of the relevant training package or accredited course?  16.2.3 Do all learning materials provided online comply with the principles of web content accessibility guidelines 2.0?  16.2.4 If applicable, 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?   16.2.5 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**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls (e.g. validation process and schedule)* * *Confirmation of your approval from NMBA and the ANMAC.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 7.2 – 7.6**  Guidelines about apprenticeship/traineeship training delivery  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

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

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| --- | --- | --- | --- |
| **17.1 Practical Placements** | | | |
| If N/A, proceed to 18. Evidence of participation | | | |
| **Considerations** | 17.1.1 Do you ensure that students undertaking practical placements have a written practical placement agreement?  17.1.2 Before the commencement of the practical placement, is each practical placement agreement signed by:   * you; * the employer or organisation hosting the practical placement; and * the Skills First Student?   17.1.3 Do you ensure that all practical placement agreements include the required minimum information?  17.1.4 Is each practical placement sufficient and appropriate to meet the vocational outcomes of the subjects?  17.1.5 For interstate practical placement, do you ensure that the practical placement agreement:   * Show that the duration of the practical placement is no more than six months; and * State that the Skills First student is enrolled in training in Victoria?   17.1.5 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**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *Templates of your practical placement agreement.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 8.1 - 8.6**  [**Practical placement guidelines**](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**  Icon  Description automatically generated | Icon  Description automatically generated | **The guidelines include a template for practical placement agreement. We highly recommend that you use this template.** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 18. Evidence of participation

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| --- | --- | --- | --- |
| **18.1 Evidence of participation** | | | |
| **Considerations** | 18.1.1 Do you meet the contract requirements for Evidence of Participation (EOP).and have you updated your processes to reflect the changes to EOP requirements introduced in the 2024-25 contract?  18.1.2 Do you have a process to ensure that you retain valid EOP in line with the contract to evidence training and/or assessment?  18.1.5 Do you ensure sufficient EOP is retained for withdrawn students? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence** | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* * *A copy of your internal audit.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 9.1 – 9.9**  *Always refer to your relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated |  |  | |
| Icon  Description automatically generated | **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).** | |
| Icon  Description automatically generated | **Guide to withdrawals** | |
|  |  | |
| Icon  Description automatically generated | **Fact Sheet: Evidence of participation** | |
|  |  | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

## 19. Reporting training activity, government-subsidised tuition fees and other information

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| --- | --- | --- |
| **19.1 Reporting training activity, government-subsidised tuition fees and other information** | | |
| **Considerations** | 19.1.1 Do you have a process for the reporting statistical data to us, and verifying that it is accurate and complete?  19.1.2 Do all staff who are responsible for reporting training delivery understand the requirements for statistical reporting?  19.1.3 Do you submit student statistical reports at least once every calendar month per data collection year?  19.1.4 If any of the data is incorrect in the student statistical reports, do you ensure correct data is resubmitted by no later than the following month?  19.1.5 Do you have processes in place to ensure that your CEO (or their nominee) certifies that the data is complete and accurate?  19.1.6 Do you comply with the reporting requirements for the Victoria Student Number (VSN)?  19.1.7 Do you ensure withdrawals are reported by the earlier of two months after the date of withdrawal or the final data submission date for the data collection year? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 10.1 – 10.7**  **Victorian VET student statistical guidelines**  **Guide to withdrawals**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 20. Determining and paying funds

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| **20.1 Fee concession / fee waiver contribution** | | | |
| **Considerations** | 20.1.1 How do you ensure that you accurately calculate the fee to be charged to students with a valid concession in accordance with the contract and guidelines about fees?  20.1.2 Do you ensure that you properly report the fee concession in accordance with the Victorian VET student statistical collection guidelines, the contract and guidelines about fees? | | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | | |
| *Examples:*   * *Your relevant process and controls.* | | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1, clauses 11.5 – 11.8**  **Guidelines about fees**  *Always refer to the relevant contract type for specific detail* | | |
| **Tips / Useful Resources**  Icon  Description automatically generated | Icon  Description automatically generated | **Fact Sheet: Concessions** | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | | |

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| --- | --- | --- |
| **20.2 Relationship between reporting and payments** | | |
| **Considerations** | 20.2.1 How do you ensure that you use the funds we pay you for training services in relation to the student for whom you claimed those funds?  20.2.2 Do you verify and confirm the following information before a student statistical report is lodged:   * that you have delivered the reported scheduled hours of training and assessment; and * that you have evidence of participation for each student to support the funds being claimed? | **Self-assessed status** |
| Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Clause 8.2**  **Schedule 1, clauses 11.12 – 11.19**  *Always refer to the relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your rectification plan where you’ve outlined the actions to address these issues)* | |

## 21. Programs and initiatives

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| --- | --- | --- |
| **21.1 Conditions** | | |
| **Considerations** | 21.1.1 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?  21.1.2 Have you incorporated the compliance requirements for any new initiatives or updates to existing initiatives? | **Self-assessed status** |
| N/A  Compliant  Non-compliant |
| **Findings**  Icon  Description automatically generated | *(Describe your practice)* | |
| **Evidence**  A picture containing text, outdoor, painted, sign  Description automatically generated | *(Embed / attach evidence)* | |
| *Examples:*   * *Your relevant process and controls.* | |
| **Contract and guidelines clauses**  Icon  Description automatically generated | **Schedule 1 part C clauses 13 – 15.6 for standard contract**  **Schedule 1 part C clauses 13 – 16.9 for TAFE and dual sector contracts**  Guidelines about eligibility  *Always refer to your relevant contract type for specific detail* | |
| **Actions if non-compliant**  Icon  Description automatically generated | *(List the relevant sections in your 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 |  |  |  |  |  |  |  |  |  |
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| 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)** | You must: ensure that all persons you employ or engage to provide the training Services are aware of all obligations under this 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 | 8/08/2024 | M Anderson | 30/06/2024 |
| **2** | **Schedule 1, Clause 3.3** | You must: record your assessment of the individual’s eligibility using the form we prescribe in [the guidelines about eligibility], or in a form that records the same information.  . | 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 | 15/02/2024 | M Anderson | 15/02/2024 |
| **5** | **Schedule 1, Clause 4.4** | You must document why you determined the program each Skills First student enrolled in was a suitable, and the most suitable, program for that individual, with reference to the information obtained through considering all items in Clause 4.3 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 15/05/2024 to ensure trainers are aware of the contract requirements. | Trainer Coordinator | 15/05/2024 | M Anderson | 15/05/2024 |
| **3** | **Schedule 1, Clause 4.10** | The Training Provider must:  You must ensure that your enrolment processes include asking all mandatory standard enrolment questions as described in the Victorian VET student statistical collection guidelines | 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 | 8/08/2024 | M Anderson | 30/06/2024 |
| **4** | **Schedule 1, Clause 6.5 (b)** | You must ensure the training plan aligns with the relevant training and assessment strategy, or documents and justifies any variation from the training and assessment strategy. | 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 2024. | Training Coordinator | 30/09/2024 | M Anderson | 30/09/2024 |
| **5** | **Schedule 1, Clauses 9.1 and 9.2** | You must document evidence of participation at the subject level for all programs on the funded scope that are delivered to Skills First students. | A review of all current year’s completed student files showed that all EOP was documented and filed as required. However, there was one instance where the EOP (work completed on assessment day) was dated one day before the Activity Start 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 * Subject ID * Date of completion  1. A refresher course for all trainers on the contract requirement is scheduled in September 2024. | Trainer Coordinator | 30/09/2024 | M Anderson | 30/09/2024 |

## CEO Endorsement

|  |  |
| --- | --- |
| **ENDORSEMENT** | |
| **Your trading name** |  |
| **Your legal name** |  |
| **TOID** |  |
| **Date of contract commencement** |  |
| **IAT conducted by** |  |
| **Date/s internal audit conducted** |  |
| *I certify that this Internal Audit Tool has been completed in accordance with the requirements of the VET Funding Contract Skills First program. In particular, the internal audit was completed within 6 months of the commencement date (i.e by 30 June 2024).  I acknowledge that the non-compliances identified through the Internal Audit Tool will be addressed in the rectification plan.* | |
| **Certified by the Chief Executive Officer (or equivalent) as an accurate appraisal of the your compliance with the provisions of the VET Funding Contract, including the rectification plan where applicable.** | **Name** |
| **Role** |
| **Signature** |
| **Date** |