



VRQA Guidelines for VET Providers AUDIT REPORT

RTO: 21859 Workplace Training Strategies Pty Ltd

Audit Date: 4 February 2013

RTO DETAILS					
RTO Name	Workplace Training Strategies Pty Ltd		NTIS Number	21859	
Address	604 Hawthorn Road, BRIGHTON EAST VIC 3187				
		Website	www.wts.edu.au		
Registration Contact	Charmaine Oliver				
Phone Number	03 9596 1099	Email	Charmaine@wptraining.com.au		
Student Numbers	Enrolments 2011 – 20 students Enrolments 2012 – 619 students				
AUDIT TEAM					
Lead Auditor	John Molenaar	Auditor/s			
Technical Advisor/s		Observer/s			
REGISTERING BODY DETAILS					
Contact Person	Emma Hickingbotham				
Phone Number	9032 1562	Email	vet.audit@edumail.vic.gov.au		
AUDIT DETAILS					
Type of Audit	Post-initial/Extension to scope/Renewal/Monitoring/Complaint/Strategic				
Guidelines audited	1.3.3, 1.3.4	2.1.1, 2.1.2,	3.4	4.1, 4.2, 4.4	5.1
Audit Date/s	4 February 2013				
Other audit notes	<p>Workplace Training Strategies Pty Ltd delivers targeted training to employees in selected workplaces. Training is marketed to employers and training/assessment arrangements are negotiated with employers for the training of employees. Agreements are entered into with employers for the required training. Once agreements have been entered into, the employees/learners are informed of the training to be delivered. All training is delivered in the enterprise.</p> <p>The majority of training is to be delivered through traineeship programs, through Higher Education and Skills Group funding. Approximately 10% of training is conducted through fee-for-service agreements.</p> <p>During 2011 20 students were enrolled in business and hospitality qualifications. During 2012 619 students were enrolled in business, finance, retail and hospitality qualifications.</p> <p>The RTO wishes to include two beauty qualifications on scope, to be delivered through traineeship programs. These qualifications are subject of this Extension to Scope audit.</p>				

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ACCOMPANYING REPORTS	Yes	No
Continuing Registration – Standards & Conditions	√	
VRQA Guidelines – Re-registration Checklist	√	

FOCUS OF AUDIT		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
NTIS Code	Qualification/Unit of Competence/Accredited Course (as per NTIS)	Delivery Site
SIB20110	Certificate II in Retail Makeup and Skincare	Enterprise work sites
SIB30110	Certificate III in Beauty Services	Enterprise work sites

INTERVIEWEE/S: Staff name and position; employer name and position; students by program (do not list by name)	
Stephen Hill	Course Coordinator

PERMANENT DELIVERY SITES:
Do the RTO's permanent delivery sites match the information provided by the VRQA?
<input checked="" type="checkbox"/> Yes, no further information required.
<input type="checkbox"/> No, please provided amended details below and seek evidence of relevant Class 9B certificates for the additional site/s:
Note: All training is delivered at employer worksites.



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AUDITOR DECLARATION

I have examined the application from the above named organisation against the *VRQA Guidelines for VET Providers* for the purpose of re-registration. It is my opinion that the organisation ~~meets~~ *does not meet* the requirements in the VRQA Guidelines for the training identified in their application.

Name of AuditorJohn Molenaar.....

Signed Date 8 February 2013

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AUDIT SUMMARY

Guideline 1: Governance, Probity and Compliance with Statutory Requirements	Result						
<p>Audit conclusion</p> <p>Guidelines 1.4 and 1.5 were not audited as part of this Extension to Scope of Registration Audit.</p> <p>Workplace Training Strategies Pty Ltd was identified as compliant with the requirements of Guidelines 1.3.3 and 1.3.4.</p>	<table border="1" style="width: 100%;"> <tr> <td style="text-align: center;">Compliant</td> <td style="text-align: center;">✓</td> </tr> <tr> <td style="text-align: center;">Non-compliant</td> <td></td> </tr> <tr> <td style="text-align: center;">Not audited</td> <td></td> </tr> </table>	Compliant	✓	Non-compliant		Not audited	
Compliant	✓						
Non-compliant							
Not audited							
Strengths							
Opportunities for Improvement							

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Guideline 2: Quality Assurance, Review and Evaluation Processes	Result
Audit conclusion	✓
Guideline 2.2 was not audited as part of this Extension to Scope of Registration Audit.	✓
Workplace Training Strategies Pty Ltd was identified as compliant with the requirements of Guidelines 2.1.1 and 2.1.2.	Compliant
Strengths	Non-compliant
Opportunities for Improvement	Not audited

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Guideline 3: Student Enrolment Records and Certification	Result
Audit conclusion	✓
Guidelines 3.1, 3.2, 3.3 and 3.5 were not audited as part of this Extension to Scope of Registration Audit.	✓
Workplace Training Strategies Pty Ltd was identified as compliant with the requirements of Guideline 3.4.	
Strengths	
Opportunities for Improvement	

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Guideline 4: Student Learning Outcomes and Welfare Services	Result
<p>Audit conclusion</p> <p>Guideline 4.3 was not audited as part of this Extension to Scope of Registration Audit.</p> <p>Workplace Training Strategies Pty Ltd was identified as compliant with the requirements of Guidelines 4.1, 4.2 and 4.4.</p>	<p>✓</p> <p>Compliant</p> <p>Non-compliant</p> <p>Not audited</p>
Strengths	
Opportunities for Improvement	

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Guideline 5: Teaching, Learning and Assessment	Result						
<p>Audit conclusion</p> <p>For the units sampled, the Unit Assessment Coversheets (Competency and Assessment Record) for each unit identified, as assessment evidence, the completion of Learner Guide learning activities. Though the Unit Assessment Coversheet (Competency and Assessment Record) provided for the confirmation that each 'learning activity' in the Learner Guide was completed, the course co-ordination confirmed that the learning tasks identified in the Learner Guide were summative assessment tasks, though the completed tasks would remain in the Learner Guide and would be retained by the learner. Completed learning tasks, or samples of completed tasks, would not be retained as evidence of the tasks completed by each student or for validation and moderation purposes.</p> <p>Recommendation:</p> <p>It is recommended that Workplace Training Strategies reviews the assessment task for each unit and determine if the Learner Guide 'learning activities' are to be formative 'assessment instruments' or 'learning activities' as part of the learning strategies. If the Learner Guide 'learning activities' are to be identified as formative assessment tasks, Workplace Training Strategies is required to identify a strategy by which samples of students' completed activities can be retained for moderation and validation purposes and clearly identify in candidate information that the 'learning activities' are to be completed as assessment tasks. If the Learner Guide 'learning activities' are not used as formative assessment instruments, these should not be identified on the Unit Assessment Coversheets (Competency and Assessment Record) as summative assessment tasks completed.</p> <p>Rectification evidence provided following the audit:</p> <p>Workplace Training Strategies had modified the Training and Assessment Strategies for the two qualifications to be included on scope, to remove reference to the Learner Guide 'learning activities' as formative assessments and to identify these as 'Learning Guide tasks'.</p> <p>Workplace Training Strategies had modified the learner information 'How will I be assessed' instructions to identify Learner Guide Tasks.</p> <p>Following a review of the rectification evidence Workplace Training Strategies was identified as compliant with the requirements of Guideline 5.1.</p>	<table border="1"> <tr> <td style="text-align: center;">Compliant</td> <td style="text-align: center;">✓</td> </tr> <tr> <td style="text-align: center;">Non-compliant</td> <td></td> </tr> <tr> <td style="text-align: center;">Not audited</td> <td></td> </tr> </table>	Compliant	✓	Non-compliant		Not audited	
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Department of Education & Training

Higher Education and Skills Group

2 Treasury Place
East Melbourne Victoria 3002
Telephone: 03 9637 2000
DX210083

21859

Ms Charmaine Oliver
Chief Executive Officer
Workplace Training Strategies
604 Hawthorn Road
BRIGHTON EAST 3187

Dear Ms Oliver

Subject: Outcome of Victorian Training Guarantee (VTG) Performance Review

I write regarding the VTG 2016 Performance Review (Review) conducted by Protiviti, on behalf of the Department of Education and Training (the Department), at Workplace Training Strategies on 31 March 2016.

In response to the recent *Review of Quality Assurance in Victoria's VET System* (Quality Review), the Victorian Government outlined¹ their commitment to "building a training system that better protects the interests of students, supports improved training quality and gives employers confidence in the skills and expertise of our workforce". The Quality Review and the Government's response places a priority on active monitoring and management of the performance of Registered Training Organisations (RTOs) to prioritise quality in determining eligibility to deliver government funded training.

Performance Reviews are one of the tools to be utilised in this new approach to the management of the VET system and are designed to monitor and assess the capabilities of RTOs to perform at a level that contributes to higher quality training services and to take further action if they are found to not be delivering quality services in key areas.

The review was conducted in accordance with Clause 10.1 of your organisation's VET Funding Contract. The objectives of the VTG Performance Review are to:

- ensure that RTOs meet the requirements of the key areas of relevant Standards, and
- assist with managing risks in the VTG program and its delivery arrangements.

Review process, scope of work and outcomes

The Review involved a site visit to gain an understanding of the quality of training services delivered by your organisation and interviews with students and trainers were conducted to provide a first-hand report against which the review observations could be compared.

The scope of work focused on gaining an understanding of the provision of quality training services delivered by your organisation in the following eight key areas:

- Training and Assessment Strategy,
- Industry Engagement,
- Facilities, equipment and training and assessment materials,

¹ Message from the Hon. Steve Herbert MP, Minister for Training and Skills, *Review of Quality Assurance in Victoria's VET System: Government response* (2015)

- Trainers' and assessors' competencies,
- Marketing practices,
- Pre-training Review (Learner Needs),
- Learner Information, and
- Learner protection

These key areas reflect the relevant quality standards for Registered Training Organisations. Additional information is also collected during the site visit relating, where relevant, to:

- student enrolment and course completion patterns,
- reporting in SVTS of elapsed time for courses,
- relevance of training assessment relative to the mode of training delivery,
- organisations' use of incentives or promotions to encourage enrolment,
- any brokering and sub-contracting arrangements, and
- the nature of professional development activities for RTOs' trainers and assessor

The Review outcome represents a point in time and is limited to the attributes listed above related to the specific qualifications nominated in its scope.

Review Observations

The two qualifications chosen for the Review were:

- Certificate III in Certificate III in Retail Baking (Bread), and
- Certificate III in Food Processing (Sales)

The report provided to the Department has identified some areas of inconsistency in one or both of the above qualifications. The inconsistencies were observed during the review based on your organisation's Training and Assessment Strategy (TAS), other relevant documentation and the student and trainer interviews. The table below highlights the specific areas of inconsistency noted in the report:

For course two: Certificate III in Food Processing (Sales)

TAS – Verification by Student Interview	A number of students interviewed in relation to the course reported an elapsed time inconsistent with the TAS course duration.
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For student and trainer interviews:

Student and Trainer Interview Detailed Observations	<ul style="list-style-type: none"> ● A number of students indicated that your organisation did not ask about their learning needs or assess whether they would be suitable for the course before they started their training. ● A number of students indicated that your organisation did not provide them with details of the units that would make up the course. ● A number of students indicated that they do not think the qualification has led to a job outcome such as a new job, increased responsibilities at their current job or allowed them to maintain their current job. ● A number of the interviews indicated that the course duration was much shorter (in hours) than the course duration stated in your organisation's TAS.
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The Department is concerned with the inconsistencies observed during the Review in relation to the reporting of short course duration and the information provided to students

prior to enrolment. The Department encourages your organisation to address these key areas as a matter of priority. The Department will continue to monitor your organisation's compliance with the VET Funding Contract as described in the VTG Compliance Framework, and reserves its right to conduct further assurance activity.

This summary completes your organisation's VTG Performance Review.

Next Steps

Thank you for your organisation's cooperation during the Review.

The Department reminds your organisation of Clause 4.1 of the VET Funding Contract that requires your organisation to "deliver high quality Training Services in accordance with [this] VET Funding Contract including but not limited to the requirements of the Quality Charter". A copy of the Quality Charter is attached for information.

The Department reserves its rights under the Contract (Clause 17.2) to withhold, suspend, cancel or terminate payment of funds and the right to require refund of funds.

The Department also reminds your organisation that in accordance with Clause 2.4 of the Contract, performance at audit or review may be taken into account when considering future contractual arrangements.

I trust that you found the performance review process helpful for supporting improvement within your organisation.

You will shortly receive a message from the Department via the SVTS containing a link to the Victorian Training Guarantee Contract Compliance Audit Program Satisfaction Survey which you are encouraged to complete. The survey is an opportunity to provide feedback regarding all aspects of the review process, and importantly assists the Department in the continuous improvement of its provider performance assurance program.

Yours sincerely



David Barron
Acting Director
Funding and Quality Assurance Services
Department of Education and Training

Date: 2/5/16

ATT: Quality Charter

Preamble

This Victorian Training Guarantee Quality Charter (the Charter) describes the Department's expectations of the RTO in the provision of key aspects of Training Services. It should be read in conjunction with the VET Funding Contract. The Charter also sets out what the RTO must do to satisfy the Department's expectations. The RTO must comply, at all times, with all parts of the Quality Charter (including this Preamble). The Charter will be updated from time to time. For the purposes of the Charter:

- Terms have the same meaning as in the VET Funding Contract; and
- a "student" means, as and when the case requires, an individual considering enrolling in or undertaking government subsidised training or an Eligible Individual.

Principle 1	Essential awareness of training entitlement
Objective	The student values and understands their training entitlement.
RTO Obligations	The RTO must communicate government funded training opportunities in a manner that is:
<i>Be ethical</i>	a. ethical, including compliant with the Statement of Expectations;
<i>Be accurate</i>	b. accurate;
<i>Be transparent</i>	c. transparent; and
<i>Be accessible</i>	d. accessible.
Principle 2	Informed choice of course and provider
Objective	The student makes an active and informed choice of both course and provider.
RTO Obligations	The RTO must, to and for each student:
<i>Inform</i>	a. provide information and support, including: <ul style="list-style-type: none"> i. how the RTO's training products, programs, pathways and delivery options will affect the individual's training outcome; and ii. all fees, costs and requirements of undertaking the program, including in accordance with the Statement of Fees;
<i>Be clear</i>	b. ensure the information provided is clear, accurate, full and relevant;
	c. ensure the support provided is reasonable and accessible; and
<i>Explain</i>	d. ensure they are made aware of how undertaking training and assessment will impact their access to further government funded training. This includes ensuring that students are aware of the full effect of any dual enrolment on the student's lifetime VTG entitlement.
Principle 3	Deliberate planning of training program
Objective	The student's training program is suitable for their individual needs.
RTO Obligations	The RTO must ensure the student's training program is suitable, where suitable means the training program:
<i>Individualise</i>	a. meets the individual's needs;
<i>Link to outcomes</i>	b. links to likely job, participation and/or further study opportunities; and
<i>Add value</i>	c. minimises duplication of the individual's existing competencies,
	as:
<i>Document</i>	d. determined and documented through a thorough and individual Pre-Training Review; and
	e. ultimately, reflected in the Training Plan.

Principle 4	High quality delivery of training and assessment
Objective	The student's training and assessment meets regulatory standards and is delivered by experts in a manner appropriate for their individual needs.
RTO obligations	The RTO must ensure:
<i>Meet RTO standards</i>	a. the student's training and assessment is delivered to Regulatory Standards;
	b. the student's training and assessment is delivered in an appropriate manner, including that:
	i. the student is provided reasonable and accessible support to facilitate their participation in training and attainment of skills; and
<i>Train enough</i>	ii. the Volume of Learning, Amount of Training, Duration, delivery modes, materials, facilities and equipment are sufficient:
	A. to meet the student's needs, including as identified through the Pre-Training Review;
	B. for the student to consolidate skills and produce job-ready competencies; and
<i>Train for long enough</i>	C. to meet the requirements and guidance in the Australian Qualifications Framework, training packages and accredited courses,
	as documented through:
<i>Use the right resources</i>	D. the Training and Assessment Strategy; and/or
	E. the Training Plan;
<i>Document</i>	c. for each learner cohort, where the Training and Assessment Strategy is structured so as to be completed in a shorter time period than the minimum described in the Australian Qualifications Framework, the RTO describes and documents within the Training and Assessment Strategy, using a rationale based on the previous skills and knowledge and the needs of learners, how a specific learner cohort:
	i. has the characteristics to achieve the required rigour and depth of training, and
	ii. can meet all of the competency requirements in a shorter timeframe.
<i>Be expert</i>	d. for each student undertaking a Practical Placement, a written agreement is in place between the RTO and the host organisation; and
	e. the student's training and assessment is delivered by a VTG Teacher.

Principle 5	Responsive feedback systems
Objective	The student can provide feedback on their training experience and the RTO responds and improves adequately.
RTO Obligations	The RTO must:
<i>Listen</i>	a. have and maintain a complaints and appeals process compliant with Regulatory Standards;
<i>Be open</i>	b. publish on its website its complaints and appeals process;
<i>Respond and resolve</i>	c. respond to and co-operate with any complaints mechanism or process established by the Department, and
<i>Improve</i>	d. participate in performance improvement initiatives as determined by the Department.

PQS Compliance Audit

Audit Report (Certificate 3 Guarantee | Higher Level Skills)

SUPPLIER		ATTACHMENT 1	
Registration Code	21859		
RTO	Workplace Training Strategies Pty Ltd as Trustee for the Workplace Training Strategies Business Trust trading as Workplace Training Strategies		
Address	604 Hawthorn Road, Brighton East, Victoria, 3187		
PARTICIPANTS			
Lead Auditor	Suzanne Sheppard	Auditor(s)	Anthony Ferry
Auditor Phone	07 3328 6816		
Supplier	Charmaine Oliver - CEO Michelle Armstrong – Administration Team Leader Amelia Gow – QLD General Manager		
AUDIT DETAILS			
Date(s)	6 and 7 September 2016		
Location	Surfers Paradise		
PQS Agreement(s)	QS100917		
Type	Monitoring <input checked="" type="checkbox"/>	Re-audit	<input type="checkbox"/>
Outcome	Compliant <input type="checkbox"/>	Not Compliant	<input checked="" type="checkbox"/>
Funding Program(s)	Certificate 3 Guarantee <input checked="" type="checkbox"/>	Higher Level Skills	<input checked="" type="checkbox"/>
Policy(-ies)	2016-17 <input type="checkbox"/> 2015-16 <input checked="" type="checkbox"/>	2016-17 <input type="checkbox"/> 2015-16 <input checked="" type="checkbox"/>	
Notes	An audit of the supplier's PS100918 User Choice PQS Agreement was conducted in conjunction with this audit.		
Qualification Code	Qualification	Number of Students Sampled	
FDF20111	Certificate II in Food Processing	16	
FDF30111	Certificate III in Food Processing	3	
SIR30212	Certificate III in Retail Operations	2	
SIT40313	Certificate IV in Hospitality	4	
SIT30713	Certificate III in Hospitality	3	
SIR40212	Certificate IV in Retail Management	2	

ASSESSMENT
 Compliant Not Compliant Not Examined

N/C N/A

For each competency for each student the supplier has retained evidence:

- to support competency had been achieved (AVETMISS Outcome identifier 20). *(PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4)*
- to support that students have attempted all assessments and failed in at least one method (AVETMISS Outcome identifier 30). *PQS Policy 15-16, 16-17 Appendix 6, Table 4)*
- to support recognition of prior learning (AVETMISS Outcome identifier 51). *(PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4)*
- resubmitted AVETMISS data to remove any previous AVETMISS Outcome identifier 40 claims for payment where the supplier has subsequently submitted a claim for payment for the same student reporting an outcome which would pay 100% (for example, AVETMISS Outcome identifiers 20, 30 and 51) and does not have approval from the department *PQS Policy 15-16, 16-17 Appendix 6, Table 4)*
- to support gap training for non-equivalent units within a transition from a superseded qualification where a unit of competency had been successfully completed under the old qualification, but the superseded competency does not map directly into the new competency, therefore requiring additional training delivery (department Outcome identifier 65). *(PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4)*

TRAINING
 Compliant Not Compliant Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- records of each student's participation in training for each unit of competency, including records of the commencement of educational content, attendance and progression. *(PQS Agreement, Clause 9)*
- This must include:
- date of training,
 - location of training,
 - hours of training for that date (e.g. 2pm-5pm),
 - unit/s of competency – trainer's name and signature, and
 - student's name and signature.

AVETMISS Reporting Requirements

The supplier has retained evidence:

- to support the student's participation in the learning activity prior to withdrawing (AVETMISS Outcome identifier 40). *(PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4)*

Achieve a minimum outcome for students

The supplier can demonstrate it:

- maintains a strong industry and employer networks to deliver training that directly links to local job vacancies and employment outcomes. *(PQS Policy 15-16, 16-17 Performance Standard 5A)*

Vocational Placement

The supplier has, where vocational or work placement is a mandatory requirement for training in a qualification, retained evidence:

- of vocational placement.
- of the quantum of vocational placement.

ADMINISTRATIVE

 Compliant Not Compliant Not Examined

N/C N/A

Records

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- a copy of the qualification(s) and statement(s) of attainment issued to each student. *(PQS Agreement, Clause 9)*

The supplier provided:

- a completed and accurate assessor's marking guide, criteria and observation checklists for each unit of competency. *(PQS Agreement, Clause 9)*
- evidence to support credit transfers (AVETMISS Outcome identifier 60). *(PQS Policy 15-16, 16-17 Appendix 4 E – Credit Transfer, Appendix 6 - Table 4)*

PQS Obligations

The supplier has:

- retained evidence it has referred each funded student to any applicable fact sheet for the relevant Program published on the department's training website *(PQS Policy 15-16, 16-17 Performance Standard 1F)*

The supplier has retained evidence it provided information up front regarding:

- a breakdown of all costs including how and when fees will be charged and collected at the unit of competency level *(PQS Policy 15-16, 16-17 Performance Standard 1, Appendix 1H)*
- training timelines, delivery mode and delivery location *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- vocational/work placement when this is a mandatory component of the qualification *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- support services available to assist students to complete training *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- a requirement to complete a student employment survey within three months of completing or discontinuing the qualification or skill set *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*

The supplier has:

- retained evidence it informed prospective students they will no longer be eligible for a government subsidised training place under the Certificate 3 Guarantee once they complete a certificate level III qualification *(PQS Policy 15-16, 16-17 Performance Standard 1) **C3G ONLY***
- retained evidence it informed prospective students they would no longer be eligible for a government subsidised training place under the Higher Level Skills program once they complete a certificate level IV or higher qualification *(PQS Policy 15-16, 16-17 Performance Standard 1) **HLS ONLY***

Refunds

The supplier has:

- a refund policy. *(PQS Policy 15-16, 16-17 Performance Standard 1C)*
- provided each prospective student a copy of, or provided access to, its refund policy *(PQS Policy 15-16, 16-17 Performance Standard 1C)*
- issued refunds as per its refund policy and retained supporting evidence.

Demonstrate professional and ethical standards of behaviour

The supplier has:

- complied with all departmental policies and directives in relation to the proper promotion and marketing of a program; including not advertising, marketing or promotion to consumers any gift or inducement an enrolled student would be eligible to receive upon enrolment *(PQS Policy 15-16, 16-17 Performance Standard 2D)*
- ensured that appropriate avenues exist for students (and/or employers where applicable) to make complaints and that business processes are in place to resolve any complaints in a timely and fair manner *(PQS Policy 15-16, 16-17 Performance Standard 2G)*

Non-compliances

Credit transfers

For Larissa Carroll (SIT40313) three units, *SITHIND301*, *SITXCOM401* and *SITXFSA101*, did not have sufficient evidence to support a credit transfer. A transcript of results was provided however, only a portion of the document was copied and it was a poor copy which was very difficult to read. The supplier was given opportunity to provide a readable statement of attainment or copy of the qualification however no additional evidence relevant to this issue was provided prior to the end of the site audit.

PQS obligations

The supplier had not retained evidence it had informed prospective students they will no longer be eligible for a government subsidised training place under the Certificate 3 Guarantee once they complete a certificate level III qualification. Similarly, the supplier had not retained evidence it had informed prospective students they will no longer be eligible for a government subsidised training place under the Higher Level Skills program once they complete a certificate level IV or higher qualification.

Rectification RequiredCredit transfers

The supplier must ensure it retains a readable copy of the qualification or statement of attainment previously issued to the student for each unit of competency/module being reported as credit transfer (AVETMISS Outcome identifier 60).

PQS obligations

The supplier must have a process in place to ensure it informs prospective students concerning all relevant information regarding the Certificate 3 Guarantee funding program identified in the policy framework and retain evidence to show this information has been provided.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

ELIGIBILITY
 Compliant Not Compliant Not Examined

N/C N/A

The supplier has retained evidence it has:

- used the Apprenticeships Info Self Service (AISS) to verify eligibility for each student. *(PQS Policy 15-16, 16-17 Performance Standard 3C)*
- implemented and used other supporting processes of integrity to verify eligibility for each student. *(Evidence Guide for Pre-qualified Suppliers 2016-17)*
- verified any specific restrictions for enrolment in a qualification outlined in the Queensland Training Subsidies List. *(PQS Policy 15-16, 16-17 Performance Standard 3C)*

Training Eligibility

The supplier has assessed prospective student's eligibility and retained evidence each student:

- was aged 15 years or above and no longer at school (with the exception of VET in School students). *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- permanently resided in Queensland. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- was an Australian citizen, an Australian permanent resident (including humanitarian entrants), a temporary resident with the necessary visa and work permits on the pathway to permanent residency, or a New Zealand citizen. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- completed Year 12 in Queensland and have commenced training within 12 months of graduating Year 12 (i.e. by the end of the calendar year after completing Year 12). *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)* **YEAR 12 GRAD ONLY**
- did not already hold a certificate level III or higher level qualification, nor be enrolled in a certificate level III or higher level qualification not including qualifications completed at school and foundation skills training. *(C3G Program Policy 15-16, 16-17)* **C3G ONLY**

- did not already hold a certificate level IV or higher level qualification, nor be enrolled in a certificate level IV or higher level qualification; not including qualifications completed at school and foundation skills training (other exceptions applicable). [\(HLS Program Policy 15-16, 16-17\)](#) **HLS ONLY.**

Subsidy Availability

The supplier has retained evidence each student, who at the time of enrolment, claimed concessional student status: [\(C3G Program Policy 15-16, 16-17\)](#) [\(HLS Program Policy 15-16, 16-17\)](#) [\(PQS Policy 15-16, 16-17 Appendix 1K\)](#)

- a) held a Health Care concession card or Pensioner Concession Card issued under Commonwealth law, and/or
- b) was the partner or a dependent of a person who held a Health Care Card or Pensioner Concession Card and is named on the card, and/or
- c) provided the Supplier with an official form under Commonwealth law confirming they, their partner, or the person of whom the student is a dependent, is entitled to concessions under a Health Care Card or Pensioner Concession Card, and/or
- d) is an Aboriginal and/or Torres Strait Islander, and/or
- e) was enrolled in a VETiS program, and/or
- f) had a disability, and/or
- g) was an adult prisoner

Non-compliances

AISS

The supplier had not carried out AISS searches for Lorene Jordan (SIT30713), Monique Smith (SIT40313), Xanana Noyay-Pass (SIR30212), Matt Reece (SIR40212), and Andrew Leech (SIR40212) to verify eligibility prior to enrolment.

Subsidy restrictions

The supplier did not retain sufficient evidence to support entry requirements for the Higher Level Skills (i.e. evidence the candidate is an existing worker in the hospitality or retail industry) for SIT40313 Certificate IV in Hospitality students Larrissa Carroll, Cassandra Ohl, and Monique Smith, or SIR40212 Certificate IV in Retail Management students Andrew Leech and Matt Reece. The supplier had retained service agreements from the relevant employers, and when asked for more evidence managed to obtain from employers and students a variety of supporting documentation, including emails verifying employment from employers, and payslips. In this instance recovery will not be sort for these students, however the supplier is reminded they are required to assess student eligibility prior to enrolment and retain all evidence to verify eligibility including any specific restrictions for enrolment in a qualification outlined in the Queensland subsidy list. This evidence must be retained for all relevant students for any future audits.

Previously held qualifications

In preparation for the site audit, the lead audit access departmental data reports for the 2014-15 and 2015-16 financial years identifying claims for seven students ineligible for the Certificate 3 Guarantee Program due to previously held qualifications. A list of these students was provided at the site audit and the supplier was given opportunity to present evidence to validate these enrolments. Prior to the end of the site audit the supplier confirmed none of the students on the list were eligible.

Payments made for students where there is insufficient evidence of eligibility or where there is evidence of ineligibility constitute "Overpayments" as defined in Clause 8 of the PQS Agreement and the department will seek recovery in this regard. Overpayments for these students will be listed separately in Attachment 2 (Schedule of Overpayments) under the title 'Previously Held Qualifications'.

Rectification Required

AISS

The supplier must develop processes to ensure an AISS search is conducted for each candidate prior to enrolment in either the Certificate 3 Guarantee or the Higher Level Skills funded program. Part of this process involves retention of a screen shot or equivalent evidence the AISS search has been conducted.

Subsidy restrictions

The supplier must assess student eligibility prior to enrolment and retain all evidence to verify eligibility including any specific restrictions for enrolment in a qualification outlined in the [Queensland Training Subsidies List](#). A process must be put in place to ensure evidence relevant to the restrictions specified is retained for all relevant future candidates.

Previously held qualifications

The supplier is required to cooperate with the department in the recovery of funds for unsubstantiated claims identified above and in Attachment 2 (Overpayments Schedule). The supplier is required to review and revise its administrative

and enrolment processes to ensure it accesses and retains records from the AISS system and other relevant sources, regarding the prospective student's achievement of or enrolment in previous nationally recognised qualifications. The absence of a student's name in AISS does not guarantee his/her eligibility under this criterion. AISS for example, does not contain all fee-for-service or interstate training records. The supplier must retain enrolment forms or other pre-enrolment documentation which requires the prospective student to provide sufficient information to enable an informed decision on eligibility to be made. Where AISS indicates a qualification has been previously attained, this renders the student ineligible irrespective of the number of units of competency reported as being achieved. If the supplier is convinced the student does not hold a qualification identified through an AISS search it may provide alternate evidence as outlined in the Evidence Guide to justify accepting the student under the funding program.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

FEES
 Compliant Not Compliant Not Examined

N/C N/A

The supplier has:

- disclosed prior to enrolment all co-contribution fees (inclusive of all essential training costs) for both concessional and non-concessional students for each qualification it is approved to deliver under the program. *(PQS Policy 15-16, 16-17 Performance Standard 1A - B, Appendix 1F)*
- published its concessional and non-concessional fees schedule to its website, labelled as the co-contribution fee *(PQS Policy 15-16, 16-17 Performance Standard 1A, Appendix 1F)*
- charged and collected a co-contribution fee for each student, and the fee was paid by the student, employer or a third party and was not paid or waived by the supplier. *(PQS Policy 15-16, 16-17 Appendix 1H - I)*
- charged and collected Student Contribution Fees at the unit of competency level. *(PQS Policy 15-16, 16-17 Appendix 1H)*
- not advertised fee free training. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- not charged for a qualification or offering in addition to the co-contribution fee. *(PQS Policy 15-16, 16-17 Appendix 1)*
- not charged co-contribution fees for units with an AVETMISS Outcome identifier of 60 or for (department Outcome identifier 65). *(PQS Policy 15-16, 16-17 Appendix 1L)*

Non-compliances

None of the invoices verifying fees charged included detail to the unit of competency level. Similarly, the information on the supplier's website and enrolment form regarding fees did not demonstrate the charging and collection of fees were at the unit of competency level.

Rectification Required

The supplier had adjusted its website and enrolment form information to rectify this non-compliance prior to completion of the site audit. The supplier is required to ensure invoices and receipts issued to funded students also meet this requirement.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

LOWER LEVEL / FOUNDATION SKILLS
 Compliant Not Compliant Not Examined

N/C N/A

The supplier has:

- retained evidence to support the delivery of lower-level training to eligible students. *(PQS Policy 15-16, 16-17 Performance Standard 4)*
- retained evidence to support the delivery of foundation skills training (i.e. language, literacy and numeracy). *(PQS Policy 15-16, 16-17 Performance Standard 4)*

Where the supplier has delivered LLN and/or foundation skills training, it retained evidence:

- it ensured foundation skills training delivered to a student was preceded by effective assessment of the student's LLN proficiency skills as defined in Performance standard 4. *(PQS Policy 15-16, 16-17 Performance Standard 4B)*
- it undertook, prior to the commencement of training, an informed analysis of each student's capabilities by assessing his/her knowledge and skills against recognised foundation skills benchmarks and the judgement was made against the skills required for entry to and completion of the vocational qualification. *(PQS Policy 15-16, 16-17 Performance Standard 4B)*
- it customised the competencies required for the desired vocational qualification. *(PQS Policy 15-16, 16-17 Performance Standard 4B)*
- it considered documented evidence of the student's history (i.e. previous education and training, work history, impairments, disabilities). *(PQS Policy 15-16, 16-17 Performance Standard 4B)*
- It developed a training and support plan that outlined how the foundation skills training that were to be delivered and the foundation skills outcomes that were to be achieved through to completion of the vocational qualification. *(PQS Policy 15-16, 16-17 Performance Standard 4B)*
- the student supported his/her training and support plan and learning pathway. *(PQS Policy 15-16, 16-17 Performance Standard 4B)*

The supplier has retained evidence, when enrolling disadvantaged learners in lower-level qualifications, it developed a training and support plan:

- tailored to the individual's circumstances and abilities. *(PQS Policy 15-16, 16-17 Performance Standard 4)*
- that included learning support strategies. *(PQS Policy 15-16, 16-17 Performance Standard 4)*
- that included an upfront skills assessment that identified the learner as disadvantaged and requiring lower-level vocational training (other than foundation skills/LLN training) prior to certificate III enrolment. *(PQS Policy 15-16, 16-17 Performance Standard 4)*

Where the supplier had provided subsidised lower-level qualifications (excluding delivery to VETiS students) it has:

- retained evidence industry or local employers have supported the qualification as the preferred employment outcome (Industry option) (could include including basic trade skills to support entry into a traditional apprenticeship pathway). *(C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)*
- ensured the qualification is mandated as a prerequisite for the certificate III level qualification under training package rules (Qualification option). *(C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)*
- adequately assessed that the student requires this pathway (Individual option). *(C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)*

Non-compliances

The supplier delivers FDF20111 Certificate II in Food Processing under the Individual option for disadvantaged learners. Outside of delivery to VETiS students, the PQS may only deliver certificate I and/or II level qualifications on the Queensland Training Subsidies List in the following circumstances:

- Qualification — where the qualification is mandated as a prerequisite for the certificate III level qualification under training package rules.
- Individual — where the student is assessed as requiring this pathway, for example lower level qualifications are supported for disadvantaged learners.
- Industry — where industry or local employers have supported the qualification as the preferred employment outcome, including basic trade skills to support entry into a traditional apprenticeship pathway.

The PQS indicated the 'Individual' pathway was the one applicable to students in the scope of the audit. For disadvantaged learners the PQS must develop a training and support plan that is tailored to the individual's circumstances and abilities at enrolment. Justification for choosing lower-level qualifications and the expected outcomes for all students must be evidenced and supporting documentation retained. Also, the PQS must develop a training and support plan that is tailored to the individual's circumstances and abilities at enrolment. For disadvantaged learners the training and support plan must include:

- learning support strategies
- documented skills assessment/s identifying the need for lower-level vocational training (other than foundation skills/LLN training) prior to, or rather than, certificate III enrolment.

The supplier did not provide sufficient evidence to support this pathway for any of the students scoped in this qualification. Further, the supplier did not provide sufficient evidence of policies, procedures or templates forming a

thorough process to support analysis of specific areas of difficulty an individual may have in completing a certificate. Of the LLN tests on student files examined only two out of the 16 students scoped indicated a requirement for extra help, and no analysis by a qualified assessor had been included. Standard training plans were also supplied, not a training and support plan that is tailored to the individual's circumstances and abilities. There was no evidence on these plans of reviewing the plan or adjusting the training pathway if needed based on the individual's progress. These training plans in some cases included some description of extra support required but no strategies, analysis of specific areas of difficulty an individual may have in completing the certificate, creative teaching methods, students preferred learning style or any further information on exactly what was required for the individual student. There was no information on how they were going to achieve this, why it was needed, or what extra support the supplier/ trainer themselves were going to need/provide. The supplier also supplied 'individual' calendars for several students however these were exactly the same template for each student just with differing dates. They included no individual strategies learnings, or support programs. Finally, there were spreadsheets with minutes of meetings between the trainers regarding students. The column relating to the handover to the trainer of a particular student included no information on any individual problems or issues, nor did it contain any information on strategies to be used. There was some evidence of reviews on students and their progress, however no individualisation of strategies or customisation.

Claims made where the supplier has no justification for delivering lower level qualifications constitute 'Overpayment' as defined in Clause 8 of the PQS Agreement and the department will seek recovery in this regard for the 16 students whose files were examined. Refer to Attachment 2 (Schedule of Overpayments) for further details

Rectification Required

The supplier is required to cooperate with the department in the recovery of funds for unsubstantiated claims made. The supplier is also required to ensure any future claims for lower level skills made under the Certificate 3 Guarantee program meet all policy requirements and align with the relevant Evidence Guide. For any future claim in this category the supplier must retain evidence of the circumstances that support the student's enrolment in a lower level qualification, either at the qualification, individual, industry or pre-apprenticeship level. Having chosen the Individual pathway, the supplier must create plans and implement procedures to ensure there is a thorough process to support analysis of specific areas of difficulty an individual may have in completing qualifications customised to the student and to the end result qualification.

The supplier should familiarise themselves with the disadvantaged learners fact sheet, the Evidence Guide for Pre-qualified Suppliers, and their obligations under the PQS Agreement. In particular for future reference performance Standard Four(c) in the PQS Policy 2016-17.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

AVETMISS DATA

Compliant Not Compliant Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- accurate AVETMISS activity start and activity end dates for each student for each unit of competency. *(PQS Agreement, Clause 9)*

The supplier has:

- reported the Delivery mode identifier specified in AVETMISS for the relevant delivery mode. *(PQS Policy 15-16, 16-17 Appendix 4D)*
- reported the Outcome code identifier specified in AVETMISS for the relevant outcome. *(PQS Policy 15-16, 16-17 Appendix 4D and Appendix 6, Table 4)*
- reported the student's eligibility for concession. *(PQS Policy 15-16, 16-17 Appendix 4D and Appendix 6, Table 3)*
- reported the correct amount of co-contribution fees collected per unit of competency (rounded to the nearest dollar). *(PQS Policy 15-16, 16-17 Appendix 4D, Appendix 8 – Table 6)*
- reported AVETMISS postcodes that accurately reflect the location in which the majority of training has been undertaken. *(PQS Policy 15-16, 16-17 Appendix 4D and E Location loadings)*
- reported the postcode and location where the training was coordinated for online delivery *(PQS Policy 15-16, 16-17 Appendix 4D and E Location loadings)*
- not submitted claims for payment for units in excess of the competency count for the qualification. *(PQS Policy 15-16, 16-17 Appendix 5B and Appendix 7 – Table 5)*

- | | | |
|-------------------------------------|--------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | not submitted claims for payment for units of competency previously assessed as competent. (PQS Policy 15-16, 16-17 Appendix 4E and Appendix 7 – Table 5) |
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | It correctly granted and reported any unit of competency available for credit transfer. (PQS Policy 15-16, 16-17 Appendix 4E, Appendix 6 - Table 4) |
| <input type="checkbox"/> | <input type="checkbox"/> | reported the correct fund source code for the student and Program (PQS Policy 15-16, 16-17 Appendix 4D, Appendix 6 Tables 1-3) |
| <input type="checkbox"/> | <input type="checkbox"/> | reported the student's highest level of school and year completed (PQS Policy 15-16, 16-17 Appendix 4D) |
| <input type="checkbox"/> | <input type="checkbox"/> | reported, within 30 days, the qualification issued flag when the student had successfully completed all requirements of a recognised qualification and the supplier has issued the qualification (PQS Policy 15-16, 16-17 Appendix 4D, Appendix 8 Table 6) |

Non-compliances

Incorrect postcodes

Incorrect postcodes had been reported for six students, Jordan Lorene, Kim Cassar, Stephanie Cornelliuss, Matt Reece, Andrew Leech, and Xanana Noyay-Pass.

Credit transfers

For both Monique Smith and Larissa Carroll, *SITHFAB201* should have been recognised as a credit transfer. Both had statements of attainment on file which identified the unit as having already been achieved. However, the supplier had not recognised the unit in the delivery of the qualification. As a result claims were submitted for competencies already assessed as competent

New student file management system

Three students were identified as not having their qualification issued. The supplier provided evidence to show the Nat file had been flagged 'yes', and suggested that migration of data issues related to a change over from VETtrak to aXcelerate student file management systems may be responsible. The supplier agreed to review its AVETMISS data delivery in the new system to eradicate any barriers to interface with the departmental system. No penalty will be imposed for the three students, Shannon Whiting, Larissa Carroll, and Cassandra Ohl.

Also, for Zenas Sofinowski and Julie Mcquade invoices examined showed a differing amount of fees collected to the amount reported. Evidence was produced to show the correct amount had been entered under one system but had not migrated correctly. Again, no penalty will be recommended in this instance.

Rectification Required

Incorrect postcodes

The supplier must correctly report the postcode where training delivery predominantly took place. The supplier must review and update its processes for the submission of AVETMISS data to ensure postcodes accurately reflect the correct location of training delivery for each student.

Credit transfers

The supplier must put process in place to ensure all credit transfers are acknowledged and are included in the competency count.

New student file management system

The supplier is required to review its current student file management system and consult with its case manager in order to correct anomalies which are affecting delivery of accurate and timely information to the departmental data management system.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

All documents are available online at: www.training.qld.gov.au.

PQS Compliance Audit

Audit Report (User Choice 2010-2016 & 2016-2017)

SUPPLIER		ATTACHMENT 1	
Registration Code	21859		
RTO	Workplace Training Strategies Pty Ltd as Trustee for the Workplace Training Strategies Business Trust trading as Workplace Training Strategies		
Address	604 Hawthorn Road BRIGHTON EAST VIC 3187		
PARTICIPANTS			
Lead Auditor	Kathiravelu Navaratnam	Auditor(s)	Drew Clark
Auditor Phone	07 3513 5462		
Supplier	Charmaine Oliver, Chief Executive Officer		
AUDIT DETAILS			
Date(s)	6-7 September 2016		
Location	Marriner Views Apartments, 18B, 7 Fern Street, Surfers Paradise, QLD, 4217		
PQS Agreement(s)	PS100918		
Type	Monitoring <input checked="" type="checkbox"/>	Re-audit	<input type="checkbox"/>
Outcome	Compliant <input type="checkbox"/>	Not Compliant	<input checked="" type="checkbox"/>
Notes			
Qualification Code	Qualification		Number of Students Sampled
SIR20212	Certificate II in Retail Services		10
SIT30713	Certificate III in Hospitality		8
FDF30610	Certificate III in Retail Baking (Bread)		6
FDF30710	Certificate III in Retail Baking (Combined)		5
SIR30212	Certificate III in Retail Operations		1

ASSESSMENT

 Compliant
 Not Compliant
 Not Examined

N/C N/A

For each competency for each student the supplier has:

- gathered sufficient evidence that competency has been achieved, as expressed by the relevant endorsed industry/enterprise competency standards of a Training Package or by the learning outcome of an accredited course to support the outcome of the assessment (AVETMISS Outcome identifier 20) *(PQS Agreement, Clause 9) (User Choice 2016-2017 Policy, Clause 2.4 (Table 3))*
- retained sufficient evidence to support that students have attempted all assessments and failed in at least one method (AVETMISS Outcome identifier 30) *(PQS Agreement, Clause 9) (User Choice 2016-2017 Policy, Clause 2.4 (Table 3))*
- retained sufficient evidence to support recognition of prior learning (AVETMISS Outcome identifier 51) *(PQS Agreement, Clause 9) (User Choice 2016-2017 Policy, Clause 2.4 (Table 3))*
- retained sufficient evidence to support transition of student to a superseding qualification and similar units of competency are deemed to be non-equivalent *(PQS Agreement, Clause 9) (User Choice 2016-2017 Policy, Clause 2.3.3) (User Choice 2016-2017 Policy, Clause 2.2.3 and 2.4 (Table 3))*
- not been funded for delivery of a unit of competency/module through RPL in any instance where this leads to the entire qualification being achieved through RPL *(User Choice 2016-2017 Policy, Table 5)*

Non-compliances

For student Shirley Brandsen enrolled in SIT30713 Certificate III in Hospitality, evidence required to adequately demonstrate competency in *SITHFAB204 Prepare and serve espresso coffee* was not retained. Packaging rules required evidence of the ability to prepare and present a diverse range of espresso coffee beverages, over multiple service periods, to meet different customer requests, e.g. cafe latte, cappuccino, espresso (short black), flat white, long black, piccolo latte, mocha, ristretto and short and long macchiato. Observation evidence was retained only for preparation and presentation of cafe latte. Non-compliance relating to insufficient assessment evidence constitutes "overpayment" as defined in Clause 8 of the Pre-qualified Supplier Agreement and the department will seek recovery in this regard. Please see Attachment 2 (Schedule of Overpayments) for further information..

Rectification Required

The supplier **must** implement a process to conduct a full range of assessment which aligns with training package requirements for all units of competency of the qualification. The supplier **must** also ensure all evidence to support completed assessment outcomes for individual units is collected and retained prior to the submission of any future claim for payment from the department.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

TRAINING

 Compliant
 Not Compliant
 Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- records of each student's participation in training for each unit of competency, including records of the commencement of educational content, attendance and progression. *(PQS Agreement, Clause 9)*

The supplier has retained evidence:

- to support the student's participation in the learning activity prior to withdrawing (AVETMISS Outcome identifier 40). *(PQS Agreement, Clause 9) (User Choice 2016-2017 Policy, Clause 2.4 (Table 3))*

Training Plans and Training Records

Where training is required to be delivered by the employer or the SRTO, the employer or the SRTO has at intervals of not more than 3 months:

- required the apprentice or trainee to produce the training record to have the particulars of the training completed by the apprentice or trainee during the interval entered and has kept the record complete, accurate and up-to-date by entering the particulars in it. *(FET Regulations r. 4(6))*

ADMINISTRATIVE

 Compliant Not Compliant Not Examined

N/C N/A

Induction information

The supplier provided, for each unit of competency:

- rate of student contribution fees
- partial tuition fee exemption categories
- full exemption tuition fee categories
- full refunds for units not commenced and proportionate refunds for units commenced but not completed
- any additional fees to be charged to the employer/industry (*User Choice 2016-2017 Policy, Clause 2.6*)

Records

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- a copy of the qualification(s) and statement(s) of attainment issued to each student. (*PQS Agreement, Clause 9*)

The supplier provided, for each unit of competency:

- a completed and accurate assessor's marking guide, criteria and observation checklists for the unit of competency. (*PQS Agreement, Clause 9*)

Training Plans

- signatures of all parties (student, employer and SRTO) sighted for all training plans *FET Act s. 74(1)*
- The SRTO has taken reasonable steps to ensure each training plan is signed:
 - (a) if the training plan is the initial training plan for the apprentice or trainee – within 3 months of the start of the apprenticeship or traineeship *FET Act s. 74(2)(a)*; or
 - (b) if a training plan for an apprentice or trainee ends because the SRTO registered training organisation has been replaced – within 28 days after the replacement day (*FET Act s. 74(2)(b)*); or
 - (c) if a training plan for an apprentice or trainee ends because the registered training contract has been permanently, temporarily or a statutory transfer – within 28 days after the transfer of the contract (*FET Act s. 74(2)(c)*)
- The SRTO ensured a copy of the signed training plan is given to each apprentice or trainee, and the employer, within 14 days after the parties sign it (*FET Act s. 75*)

Requirements of a Training Plan for an Apprentice or Trainee

- The training plan format implemented by the organisation contains the minimum requirements as outlined within Guide to Training Plans and Training Records and the nationally approved training plan template (released 11 September 2014) (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Training Plans*)
- Individual training plans within student files have been fully developed (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Training Plans*)
- Training plans address training package requirements in relation to the selection and sequencing of units of competency (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Training Plans*)

Training Records

- The SRTO has provided the apprentice or trainee with the appropriate training record to be kept for the apprenticeship or traineeship within 14 days after a training plan is signed by the parties to the training plan (*FET Regulations r. 4(1)*)

AVETMISS Reporting Requirements

The supplier has:

- retained sufficient evidence to support credit transfers (AVETMISS Outcome identifier 60) (*PQS Agreement, Clause 9*) (*User Choice 2016-2017 Policy, Clause 2.4 (Table 3)*)
- retained sufficient evidence that an induction was conducted and training plan developed prior to the student's training contract being cancelled or the student changing suppliers (SRTO1 Administration Payment) (*User Choice 2016-2017 Policy, Clause 2.4.7*)

Opportunity for Improvement

It is recommended the supplier revise its current processes for demonstrating it has provided students with the appropriate training record within 14 days after a training plan was signed by the parties to include in the sign-off that the student has **received** the record not just that it is 'attached'.

Non-compliances

Training plan

The supplier used a customised training plan template and it did not contain some required components as outlined within *Guide to Training Plans and Training Records* and the nationally approved training plan template. Information on core/elective, training mode, training responsibility, assessment details and support services were not captured in the template used by the supplier. Also, across the sample reviewed, the supplier was not able to demonstrate a copy of the signed training plan had been given to relevant employers within 14 days after all the parties have signed it.

Training Package requirements

For Shirley Bransden, Isabella Connelly and Chloe Downs, enrolled in SIT30713 Certificate III in Hospitality, training plans on file contained 17 units of competency, two more than the 15 identified in training package requirements. The inclusion of the additional two units of competency was discussed, and the supplier was advised that any additional units of competency agreed between the parties which do not form part of the User Choice funded component of the training and assessment must be separated on the training plan and specify fee for service units in excess of training package requirements..

In addition, for these three students, sequencing of units of competency within the training plan did not account for *SITXFSA101 Use hygienic practices for food safety* being a pre-requisite for a number of units (mainly *SITHFAB203 Prepare and serve non-alcoholic beverages*, *SITHFAB206 Serve food and beverage* and *SITHFAB309 Provide advice on food*). The 'Training Calendar' for the workplace reiterated this as the above 4 units of competency commenced on 23 February 2016 and the pre-requisite unit of competency commenced on 2 March 2016. Thus, the sequencing of units of competency within the training plan was not in line with Training Package requirements. However, further review of the actual delivery schedule proved that this pre-requisite unit of competency had been delivered before the related units of competency.

For Shirley Bransden enrolled in SIT30713 Certificate III in Hospitality, the training plan showed that the selection of *SITHFAB206 Serve food and beverage* and *SITHFAB401 Plan and monitor espresso coffee service* did not align with Training Package requirements. The supplier selected only three units of competency (*SITHFAB203 Prepare and serve non-alcoholic beverages*, *SITHFAB204 Prepare and serve espresso coffee* and *SITHFAB309 Provide advice on food*) of the required five units of competency from the Group B in relation to the selection of electives. Accordingly, the training plan did not align with the training package requirements for this qualification as *SITHFAB206* and *SITHFAB401* were not available in Group B and consequently excess to required units. Consequently the department will recover funds paid for these two units. Please see Attachment 2 (Schedule of Overpayments) for further information.

Rectification Required

Training Plan

The supplier **must** ensure it includes all components required for inclusion in the training plan as outlined within the *Guide to Training Plans and Training Records* and the nationally approved training plan template and that there is a monitoring process in place to guarantee training plans are fully completed. Also, the supplier **must** ensure that a copy of the training plan has been issued to the employers within 14 days after all the parties have signed and retain evidence this process has occurred.

Training Package requirements

The supplier **must** implement a process to ensure that the training plan is developed in accordance with the Training Packaging rules in terms of type and number of units of competency requirements specific to qualification delivered. If additional units of competency to those required by the packaging rules are to be delivered the supplier **must** ensure the training plan clearly separates units funded under the User Choice program from those provided outside of the funding. In addition, the supplier **must** have a process in place to ensure that sequencing of units of competency within training plan accounts for required pre-requisite in line with Training Package requirements and deliver them accordingly.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

EMPLOYER RESOURCE ASSESSMENT

 Compliant
 Not Compliant
 Not Examined

N/C N/A

The supplier provided evidence it:

- assessed employment arrangements of each student to ensure the employer provides adequate facilities, range of work supervision and the on-the-job training required by the Act. (*User Choice 2016-2017 Policy, Clause 1.2*)
- sourced or developed an employer resource assessment document which addresses the employment and training arrangements required under the Act for traineeships and apprenticeships (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Employment Arrangements*)
- has taken appropriate action when the employment arrangements do not meet the requirements of the Act, the Agreement and/or the qualification (*User Choice 2016-2017 Policy, Clause 1.2*)

Non-compliances

Review of the Employee Resources Assessment (ERA) form (ATF-013) for SIR20212 Certificate II in Retail Services indicated a variation between the number of qualified persons stated as available within the workplace and the number of persons detailed within the supervisory arrangements section. In many instances, the supplier stated five qualified persons as supervisors, however, the details provided within the supervisory arrangement section varied between 2 and 4. In addition, the supplier failed to provide rationale for why supervisory arrangements have been determined sufficient where there were more trainees than qualified supervisors. The student mix consisted of part and full-time students and School Apprentices and Trainees (SAT). Evidence of supervisory arrangements was inadequate across the qualification. The supplier has also failed to take appropriate satisfactory action when the employment arrangements did not meet the requirements of the qualification, including when a supervisor transfers from workplace.

Non-compliance relating to insufficient Employee Resource Arrangement will be referred to the respective Regional office.

Rectification Required

The supplier **must** establish process to verify and confirm that the number of qualified persons stated as available within the workplace and the workplace supervisors detailed within the supervisory arrangements section of the ERA are the same and all information provided is accurate. The supplier **must** also ensure that the ratio of trainees to supervisory staff is justified as to why supervision arrangements have been determined sufficient where there were more trainees than qualified supervisors within workplace. When the employment arrangements do not meet the requirements of the Act, the Agreement and/or the qualification, the supplier must take appropriate action to meet the requirements of the qualification, including when supervisor transfers from workplace.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

FEES

 Compliant
 Not Compliant
 Not Examined

N/C N/A

The supplier has:

- charged student contribution fees for all students (excluding school-based apprentices and trainees (SATs) and appropriately approved exemptions) and retained evidence of fees collected (*User Choice 2016-2017 Policy, Clause 2.6.1*)
- calculated individual student contribution fees at the correct rate taking into consideration any partial or full exemptions (*User Choice 2016-2017 Policy, Clause 2.6.1*)
- retained sufficient evidence to support the granting of student contribution fee exemptions (*User Choice 2016-2017 Policy, Clause 2.6.2 and Clause 2.6.3*)
- not charge a student contribution fee for any SAT (*User Choice 2016-2017 Policy, Clause 2.6.3*)
- not charged student contribution fees for units of competency/modules granted, or which should have been granted, through credit transfer/national recognition (*User Choice 2016-2017 Policy, Clause 2.6.3*)
- not charged student contribution fees for units of competency/modules when the student has transferred to a superseding qualification and the unit of competency/module is deemed to be non-equivalent (*User Choice*

2016-2017 Policy, Clause 2.6.3)

- not charged student contribution fees for students undertaking a qualification as part of a *Skilling Queenslanders for Work – Work Skills Traineeship* (*User Choice 2016-2017 Policy, Clause 2.6.3*)
- not charged Queensland Year 12 graduates who have commenced a High Priority qualification within 12 months of completing Year 12 (*User Choice 2016-2017 Policy, Clause 2.6.4*)
- retained sufficient evidence that additional charges to the employer have been negotiated (*User Choice 2016-2017 Policy, Clause 2.6.5*)
- not charged a fee for:
- (a) the provision of materials essential to achieving competence
- (b) the development and supply of a training plan
- (c) the development and supply of the initial training record (*User Choice 2016-2017 Policy, Clause 2.6.7*)
- not withheld the issuance of a qualification or statement of attainment due to non-payment of fees (*User Choice 2016-2017 Policy, Clause 2.6.9*)

Refunds

The supplier has:

- provision for full refunds to students for Student Contribution Fees charged for training delivery that had not commenced at the time of cancellation of the enrolment. (*User Choice 2016-2017 Policy, Clause 2.6.6*)
- provision for proportionate refunds where the student has withdrawn from a Unit of Competency/Module. (*User Choice 2016-2017 Policy, Clause 2.6.6*)
- provision for refunds for employers/industry for additional charges paid beyond the student and government contributions. (*User Choice 2016-2017 Policy, Clause 2.6.6*)

Non-compliances

Mathew Popovic and Thomas Popovic, enrolled in SIR202212 Certificate II in Retail Services qualification, had commenced their traineeship within 12 months of completing their Year 12. The enrolment form incorrectly nominated the student have GS2 (Year 12 Graduate 100% Fee Free) and did not charge and collect student contribution fees from them. This qualification did not have a high priority rating for User Choice funded training and thus fee free exemption was not applicable to the two students.

For Isabella Connelly, the supplier failed to calculate and charge student contribution fees due to fees charged for a unit of competency granted through credit transfer. This resulted in an overcharge to the student of \$16.00.

Rectification Required

The supplier must review and revise its process to determine Year 12 Graduate 100% Fee Free (GS2) according to the policy framework and the priority list of qualifications for the students who commenced their training within 12 month of completion of Year 12 to ensure accuracy in fees charged.

The supplier must also revise its administrative and monitoring processes to identify credit transfers for all candidates and ensure student fees are consistently adjusted accordingly.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

ON THE JOB VERIFICATION

Compliant Not Compliant Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment:

- including evidence that the supplier has a process in place to capture the employer's verification regarding the on-the-job training component (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Assessment*)
- including evidence that the supplier has consistently retained evidence to support that the on-the-job training component has been achieved for each unit of competency for each student prior to submission of claims for payment (*PQS Agreement, Clause 9.1(c)*) (*Evidence Guide (User Choice 2016-2017) for FET Act 2014, Assessment*)

Non-compliances

The supplier had a process in place for conducting on-the-job verification. However, this process did not provide sufficient detail in terms of student progress through individual units of competency across the sample audited for SIT30713 Certificate III in Hospitality, FDF30610 Certificate III in Retail Baking (Bread), FDF30710 Certificate III in

Retail Banking (Combined) and SIR30212 Certificate III in Retail Operations.

For Amy-Anne Powley and Jasmyrn Rae, enrolled in SIR20212 Certificate in Retail Services, third party reports were completed for all units of competency. However, for both students *SIRXMER202 Plan, create and maintain displays*; *SIRXSL002A Advise on products and services*; and *SIRXSL201 Sell products and services* had been signed off by someone who was not recognised within ERA as a supervisor. Thus, the supplier provided no evidence of valid and adequate on-the-job verification for the six units of competency. This constitutes an 'Overpayment' as defined in Clause 8 of the PQS agreement and the department will recover in this regard.

In five instances, on-the-job verifications have been signed off by staff members other than those recognised within the ERA as being qualified workplace supervisors. However, the supplier provided an email with a statement from the relevant employer confirming all staff members named have sufficient retail experience to be a qualified supervisor for these trainees.

Rectification Required

The supplier **must** have a process in place to ensure that on-the-job training component has been signed off for every unit of competency for all students by employer or supervisor who has been acknowledged as being a 'qualified person' and is listed within the student's relevant employer resource assessment. If it is to be signed by another person, the supplier must retain evidence to substantiate how this person has met the requirements of a 'qualified person'.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

AVETMISS DATA

Compliant Not Compliant Not Examined

N/C N/A

The supplier has:

- reported the Delivery mode identifier specified in AVETMISS for the relevant delivery mode. (*User Choice 2016-2017 Policy, Clause 2.4.3*)
- reported accurate AVETMISS activity start and activity end dates for each student for each unit of competency (*PQS Agreement, Clause 9.1*)
- submitted AVETMISS postcodes that accurately reflect the location in which the majority of training has been undertaken (*User Choice 2016-2017 Policy, Clause 2.4.3*)
- not submitted claims for payment for units in excess of the competency count for the qualification (*User Choice 2016-2017 Policy, Clause 2.4 Table 5*)
- not submitted claims for payment for units of competency previously assessed as competent (*User Choice 2016-2017 Policy, Clause 2.4 Table 5*)

Non-compliances

The supplier reported to AVETMISS incorrect postcodes that did not accurately represent the location where the training had been conducted for some students across the qualifications in scope of this audit. The incorrect reporting of the postcodes did not have material impact on the funds claimed by the supplier. For Mathew Popovic and Thomas Popovic enrolled in SIR20212 Certificate II in Retail Services, AVETMISS end dates reported for three units of competency were incorrect. Thus, the end date reported to the department and funds claimed had occurred prior to the actual completion date.

Rectification Required

The supplier must develop and implement a process to ensure that it submits AVETMISS postcodes which accurately represent the location in which the training and assessment have taken place for each student. The supplier **must** also implement a process to ensure that it submits evidence to support complete training and assessment including accurate and valid the start and end dates for each student for each unit of competency.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

All documents are available online at: www.training.qld.gov.au.