

Audit Date: 19–20 August 2019 **RTO:** Glen Eira Adult Learning Centre Inc.

Applicant Details					
Applicant Name	Glen Eira Adult Learning Centre Inc.	TOID	6511		
Address	Address 260 Booran Road, Ormond, 3204				
		Website	http://gealc.org.au/		
Registration Contact	tion Contact Ms. Philippa Caris				
Phone Number	9578 8996	Email	manager@gealc.org.au		
Audit Team					
Audit Firm	Quorum QA Australia Pty Ltd	Auditor/s	Carol Macreadie		
Auditor/s		Other Attendees			
Registering Body Details					
Contact Person	Julie Florence				
Phone Number	9032 1560	Email	vet.audit@edumail.vic.gov.au		
Audit Details					
Type of Audit	Re-registration Audit				
Conditions Audited	3, 6, 7, 8, 9				
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, 2.4 , 2.5, 2.6, 2.7 3.1, 3.2, 3.3 , 3.4		3.1, 3.2, 3.3 , 3.4	
2016 VRQA Guidelines	1.3	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8 (If applicable)			
Audited	3.1, 3.2, 3.3, 3.4, 3.5	4.1,4.2, 4.3 to 4.6 (If applicable)			
Audit Date/s	19-20 August 2019	19-20 August 2019			

RTO Background

Glen Eira Adult Learning Centre Inc. (GEALC) has been operating for over 30 years and is an incorporated, not-for-profit organisation which aims to provide affordable and accessible educational opportunities to adults (18 years and over) in the Glen Eira area. It is community-managed through a voluntary Committee of Management.

GEALC provides services in four main program areas:

- English as an Additional Language (EAL) training, delivered by the RTO on a part-time rather than full-time basis
- Work-related skills such as computers, business administration, medical reception and MYOB
- Recreational and wellness programs
- Community strengthening activities and events.

The EAL students are either AMEP-funded students enrolled in accredited courses and ACFE-funded or fee-for-service students, in the same classroom but enrolled in pre-accredited training. In the last two years, student enrolment in EAL courses has grown from 55 to 170, mainly Chinese students.



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GEALC currently employs an Executive Officer, an Education Coordinator, a Finance Officer, three administration staff, and a number of part-time EAL tutors. It also relies on a significant contribution from volunteer members who carry out such tasks as administration, quality assurance, computer support, archiving and OHS.

Qualifications/Units Audited ¹				
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE				
TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site		
22486VIC	Certificate III in English as an Additional Language (Access)	260 Booran Road, Ormond		
22483VIC	Course in English as an Additional Language	260 Booran Road, Ormond		

Interviewee(s) – Staff name and position; employer name and position		
Philippa Caris	Executive Officer	
Ann Manning	Education Coordinator	
Stephanie Daley	Trainer, 22486VIC Certificate III in EAL (Access)	
Kerry Moore	Trainer, 22483VIC Course in EAL	

Permanent Delivery Sites –	Yes	No
Do the RTO's permanent delivery sites match the information provided by the VRQA?	X	
If 'No', please provide amended details below:		

Third party Arrangements –	Yes	No
Do the RTO's third-party arrangements match the information provided by the VRQA?		
If 'No', please provide amended details below:		

¹ Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology



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Audit Summary - AQTF Conditions of Registration

	QTF Conditions ace an X in the appropriate column	Compliant	Non- Compliant	Not audited
1	Governance			Х
2	Interactions with the Registering Body			Х
3	Compliance with Legislation	Х		
4	Insurance			Х
5	Financial Management			Χ
6	Certification and Issuing of Qualifications and Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs		Х	
8	Accuracy and Integrity of Marketing	Х		
9	Transition to Training Packages/Expiry of Accredited Courses	Х		

Summary of Non-Compliance²

CF.6.1

The RTO's Qualification and Statement of Attainment documentation does not meet the Australian Qualifications Framework (AQF) requirement that a Statement of Attainment must be in a form that ensures it cannot be mistaken for a testamur for a full AQF Qualification.

CF.6.2

The RTO has not issued Certificates or Statements of Attainment within a reasonable timeframe after students have been assessed as competent.

CF.6.3

The RTO does not supply a USI Privacy Statement to students.

CF 6.4

The RTO does not have an adequate system in place to keep its records secure as required by the AQTF.

CF.7.1

The RTO does not supply applicants and students with information about National Recognition of Qualifications.

Strength	٤
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² CF = Condition Finding. Finding references are aligned to the Detailed Findings section of this report.



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Audit Summary - AQTF Standards

AQTF Standards/Elements	Compliant	Non- Compliant	Not audited
Standard 1			
1.1 – Continuous Improvement Strategy		Х	
1.2 - Training and Assessment Strategies		Χ	
1.3 – Training and Assessment Resources	Х		
1.4 – Trainer and Assessor Competency	Х		
1.5 – Assessment Strategies		Χ	
Standard 2			
2.1 – Meeting the Needs of Clients	X		
2.2 – Continuous Improvement of Client Services		Χ	
2.3 – Provision of Information to Clients		X	
2.4 – Third-Party Engagement in Training and Assessment			Χ
2.5 – Provision of Support Services to Clients	Х		
2.6 – Learner Access to Records of Participation		Χ	
2.7 – Complaints and Appeals Strategy		Χ	
Standard 3			
3.1 – Operations Management		X	
3.2 – Continuous Improvement of Operations	Х		
3.3 – Third-Party Training and/ or Assessment Services			Χ
3.4 – Records Management		Х	

Summary of Non-Compliance³

SF.1.1.1

The RTO provided very limited evidence of collection and analysis of data relating to training and assessment to identify improvement opportunities and take actions to improve training and assessment.

SF 1.2.1

22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)

The documents which comprise the Training and Assessment Strategy (TAS) for both Qualifications do not identify the cohort in sufficient detail to explain how the strategy is developed to meet their needs.

³ SF = Standard Finding. Finding references are aligned to the Detailed Findings section of this report.



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SF 1.2.2

22486VIC Certificate III in EAL (Access)

The documents which comprise the Training and Assessment Strategy (TAS) do not describe the training program as delivered.

SF 1.5.1

22486VIC Certificate III in EAL (Access)

The assessment tools do not consistently meet the principles of assessment.

SF 1.5.2

Assessment tools are not systematically validated.

SF.2.2.1

The RTO provided only limited evidence of collection and analysis of data relating to client services to identify improvement opportunities and take actions to improve them.

SF.2.3.1

The RTO does not provide accurate enrolment documentation to clients prior to enrolment.

SF.2.6.1

The RTO has not provided learners with timely access to current and accurate records of their participation and progress.

SF.2.6.2

The RTO does not effectively communicate to learners and to staff about how learners can access records of their participation.

SF.2.7.1

The RTO's policy and procedures to address complaints and appeals do not include reference to escalation to the VRQA or the National Complaints hotline.

SF.3.1.1

The RTO's agreement with students does not adequately detail the services to be provided.

SF.3.1.2

The RTO's management of operations has not ensured that students receive the Certificates or Statements of Attainment to which they are entitled in a timely manner.

SF.3.4.1

The RTO has not managed its records to ensure they are accurate and complete.

Strengths



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Audit Summary - 2016 VRQA Guidelines for VET Providers

2016 VRQA Guidelines	Compliant	Non- Compliant	Not audited
1. Governance, Financial viability and Management systems			
1.1 – Strategic Plan and Business Plan			Χ
1.2 – Financial Viability			Χ
1.3 – Management Systems			Χ
1.4 – Governance			Χ
2. Transparency and oversight of third parties			
2.1 – Third party agreement			Χ
2.2 – Co-operation with VRQA			Χ
2.3 – Notifying VRQA of third-party agreements			Χ
2.4 – Information - Disclosure of third-party services			Χ
2.5 – Pre-enrolment materials - Disclosure of third-party services			Χ
2.6 – Changes to third party services			Χ
2.7 – Complaints - Third party services			Χ
2.8 – Appeals - Third party services			Χ
3. Trainer and assessor qualification (including individuals working under the supervision of a trainer			
3.1 – Vocational and Industry skill requirements	X		
3.2 - Training and Assessment (TAE) skill requirements	X		
3.3 – Assessment only skill requirements			Χ
3.4 – Supervision arrangement requirements			Χ
3.5 – Trainer under supervision skill requirements			Χ
4. Delivery of training and assessment services			
4.1 – Training and assessment practices	Х		
4.2 – Amount of training	X		
4.3 – TAE - Independent validation of assessment system, tools, processes and outcomes			Х
4.4 – TAE – Trainer and Assessor skills (1 January 2016 to 31 December 2016)			Χ
4.5 – TAE – Trainer and Assessor skills (1 January 2017 onwards)			Χ



4.6 – TAE – Trainer under supervision requirements	Х
4.7 – TAE – Registration requirements	Х
5. Annual Declaration of Compliance	
5.1 – Annual Declaration of Compliance	Х

Summary of Non-Compliance ⁴	
Nil	
Strengths	

 $^{^4}$ GF = Guideline Finding. Finding references are aligned to the Detailed Findings section of this report.



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Detailed Findings - AQTF Conditions of Registration

CONDITION 1 - Governance

Not audited in Phase 2 audit

CONDITION 2 - Interactions with the Registering Body

Not audited in Phase 2 audit

CONDITION 3 - Compliance with Legislation

Compliant

- Staff and Volunteer Obligations form signed list of relevant legislation, kept in staff folders
- Employee Induction Checklist includes provision of Staff Handbook and online policy manual access
- Policies of GEALC Inc v.6.0 31/01/2019 Online Policy Manual
- Staff Handbook v3.0
- EAL/Literacy Tutor's Induction Checklist
- Interview with Philippa Caris, Executive Officer:
 - Staff can access the actual legislation documents on the RTO's Google Sharedrive
 - Tutors are notified of changes and updates at the quarterly tutor meetings, otherwise by email or face-to-face as they are all part-time.
- Student Handbook v4.0 for non-AMEP students
- Adult Migrant English Program (AMEP) Student Handbook v2.0 for AMEP students
- Student Acknowledgement of Obligations v1.0 includes student signature
- Interview with Ann Manning, Education Coordinator:



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- All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer. Privacy and similar issues are explained to them. Low level applicants generally bring a family member/friend to interpret for them. The Finance Officer (working 2 days per week) speaks Mandarin and assists when needed and available.
- The instructions for applying for a USI are available translated into Mandarin and Cantonese sighted
- The Enrolment Form, Student Handbook and Code of Conduct are available translated into Mandarin sighted
- They felt students didn't understand ticking the USI privacy box so they take the applicant and any helper present through the process using the Quick Guide and all students get their own USI at home.

CONDITION 4 - Insurance

Not audited in Phase 2 audit

CONDITION 5 - Financial Management

Not audited in Phase 2 audit



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CONDITION 6 - Certification and Issuing of Qualifications and Statements of Attainment

Non-Compliant

- Policies of GEALC Inc v.6.0 31/01/2019 10.7 Issuing Australian Qualification Framework Qualifications and Statements of Attainment
- Template for AQF Statement of Attainment follows the ASQA Factsheet sample format
- Template for AQF Statement of Completion issued for achievement of a Certificate
- Interview with Philippa Caris, Executive Officer, and Ann Manning, Education Coordinator:
 - RTO changed from delivering the Certificates in Spoken and Written English (CSWE) to the English as an Additional Language (EAL) Framework. There is a group of students from the period mid-2017 to end 2018, who were part-way through the CSWE qualification which is no longer being delivered. They were informed of the change to a new course and were not given RPL against the new units they were just enrolled in the new Qualification. Students generally didn't mind as they mostly still had AMEP hours left and they were happy to be learning English, not so focussed on getting a Qualification.
 At the end of Year 2 of delivery, they will get Statements of Attainment from GEALC for the EAL units they have completed successfully.
 - The hard copy 2018 Assessment the Student Management System (SMS) used is Wisenet, which produces AVETMISS compliant data and prevents
 Qualification issuance without a USI
 - Until mid-2017 all AMEP certificates were issued by the AMEP national contract manager. The RTO did not keep its own records of module completion as these were entered into the AMEP Reporting and Management System (ARMS) central database and available to the RTO. Since the contract manager of the AMEP Program changed in mid-2017, the RTO no longer has open access to ARMS. The RTO has not issued any Certificates or Statements of Attainment to students, only its own Statements of Participation.
 - The RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled. The RTO was unable to provide to the auditor a list of students to whom Certificates or Statements of Attainment have been issued as they have never maintained their own records and no longer have access to ARMS.
 - The RTO has developed these GEALC templates for Certificates and Statements of Attainment, for use later in 2019.
 - The RTO has established its own system for recording outcomes and issuing Certificates for use in 2019 but it has not been used so far as no students have yet completed a unit. Teachers are only just starting to complete units now, and all assessment is to be completed by end of November so there are no completions to input until then. In the meantime, teachers keep paper records of outcomes in the Attendance Roll. If a student withdrew now, the RTO could issue any earned Certificates or Statements of Attainment, and they would be filed as a pdf in each student's folder.
 - At the end of 2018, the Achievement Summary Grids were mislaid after the outcomes were entered into the ARMS database.



- Policy 2.7 Records Management and Version Control
- Policy 2.6 Student Management System Data Entry
- Version Control Register maintained and current
- Interview with Philippa Caris, Executive Officer:
 - All paper records are boxed and labelled with a 'destroy by' date. Signed paper documentation such as enrolment forms/attendance records/summaries of outcomes are stored for 30 years. They are kept in an unlocked cupboard on the premises.
 - As the RTO is affected by the varying requirements of different funding bodies, they decided to keep all other documents such as student assessments for 7 years.
 - Wisenet has a cloud-based storage system for outcomes, Certificates and enrolment information
 - Electronic copies of records and communications are backed up onto two small hard drives alternately and the Executive Officer takes one home every day so a maximum of one day's data is at risk.
- Interview with Ann Manning, Education Coordinator:
 - All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer. Low level applicants generally bring a family member/friend to interpret for them. The Finance Officer (working 2 days per week) speaks Mandarin and assists when needed and available.
 - The instructions for applying for a USI are translated into Mandarin and Cantonese sighted
 - They felt students didn't understand ticking the privacy box so they take the applicant and any helper present through the process using the Quick Guide and all students get their own USI at home.
- 12 x student Enrolment Forms
- Student Acknowledgement of Obligations v1.0 includes the line item, "Instructed in the creation of a USI" and includes student signature

CF.6.1 Finding	Required Rectification(s)
The RTO's Qualification and Statement of Attainment documentation does not meet the Australian Qualifications Framework (AQF) requirements that a Statement of Attainment must be in a form that ensures it cannot be mistaken for a testamur for a full AQF Qualification.	The RTO must ensure that their Qualification and Statement of Attainment documentation meets the Australian Qualifications Framework (AQF) requirements.



Evidence	
The RTO's Statement of Attainment follows the ASQA Factsheet sample format.	
 The RTO's Qualification testamur is titled 'Statement of Completion'. It is the same template as the Statement of Attainment and contains exactly the same wording except for "completion" instead of "attainment". It contains the words: "A statement of attainment is issued by a registered training organisation when an individual has completed one or more accredited units". 	
 It does not contain the words: "The Qualification is recognised within the Australian Qualifications Framework" or the AQF logo, as required in the AQF Qualifications Issuance Policy 2.1.5. 	
 AQF Qualifications Issuance Policy 2.5.5 states that: "The statement of attainment must be in a form that ensures it cannot be mistaken for a testamur". The highly similar look and phrasing could lead to confusion between the two documents. 	
CF.6.2. Finding	Required Rectification(s)
The RTO has not issued Certificates or Statements of Attainment within a reasonable timeframe after students have been assessed as competent.	The RTO must issue Certificates or Statements of Attainment within a reasonable timeframe after
Evidence	students have been assessed as competent.
The RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any	
Qualifications or Statements of Attainment to which they are entitled as it has not maintained its own records and it cannot currently access student records in the ARMS database.	
Qualifications or Statements of Attainment to which they are entitled as it has not maintained its own records	
 Qualifications or Statements of Attainment to which they are entitled as it has not maintained its own records and it cannot currently access student records in the ARMS database. The RTO was unable to provide to the auditor a list of students from 2018 to whom Certificates or 	Required Rectification(s)
 Qualifications or Statements of Attainment to which they are entitled as it has not maintained its own records and it cannot currently access student records in the ARMS database. The RTO was unable to provide to the auditor a list of students from 2018 to whom Certificates or Statements of Attainment have been issued. 	The RTO must supply a USI Privacy Statement to
 Qualifications or Statements of Attainment to which they are entitled as it has not maintained its own records and it cannot currently access student records in the ARMS database. The RTO was unable to provide to the auditor a list of students from 2018 to whom Certificates or Statements of Attainment have been issued. CF.6.3 Finding 	. ,



CF.6.4 Finding	Required Rectification(s)
	The RTO must ensure that it has an adequate system
1 EVIDENCE	in place to keep its records securely as required by the AQTF.
Signed paper documentation such as enrolment forms/attendance records/summaries of outcomes are kept in unlocked cupboards on the premises, not in a locked cupboard as per the RTO's own Policy 2.7 Records Management and Version Control	
The storage is not fireproof.	



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CONDITION 7 - Recognition of Qualifications Issued by other RTOs

Non-Compliant

- Policy Manual 10.3.2 Recognition of Qualifications Issued by other RTOs states that this information will be included in information to clients
- Student Handbook and AMEP Student Handbook neither of these contain information on National recognition of Qualifications
- Interview with Ann Manning, Education Coordinator:
 - Prior to mid-2017 when the course management changed hands, Credit Transfer for AMEP students happened through the ARMS central database. Now if a student says they have studied a similar course previously at another centre, they would contact that centre and request details of the student's achievements.
 - There is no Credit Transfer student application form because to date no-one has asked for it.

CF.7.1 Finding	Required Rectification(s)
The RTO does not supply applicants and students with information about National recognition of Qualifications.	The RTO must supply applicants and students with
Evidence	information about National recognition of Qualifications.
There is no information on national recognition of Qualifications in any of the documentation provided to applicants or students, contrary to the RTO's own policy.	



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CONDITION 8 - Accuracy and Integrity of Marketing

Compliant

Evidence/Documentation Reviewed

- Website http://gealc.org.au/
- Other print-based marketing materials Course Brochure Term 3 2019; flyer for EAL Beginners, EAL III; EAL Timetable Term 3 2019
- Policy and Procedure 2.3 Enrolment refers to film and photographic permission
- Policy 5. Marketing
- Enrolment form contains a tickbox for photographic permission

Improvement Opportunities

• The photographic permission tickbox on the Enrolment form is with two other tickboxes agreeing to receive newsletters and to be acknowledged in a ceremony. It is in very small font and under the heading 'Membership'. Its significance should be clearer and more explicit to ensure students understand what they are consenting to.



CONDITION 9 - Transition to Training Packages/Expiry of Accredited Courses	Compliant	
Evidence/Documentation Reviewed		
Website and flyers are accurate		
Certification templates are accurate		
Learning and assessment resources are compliant		



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Detailed Findings - AQTF Standards

ELEMENT 1.1 - The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment.

Non-Compliant

- Interview with Philippa Caris, Executive Officer:
 - Lots of continuous improvement issues are dealt with informally and verbally because they are a small organisation operating out of one site.
 - At the end of a course, students fill in surveys by funding source AMEP students complete an online survey. The RTO used to receive a feedback summary but not since the contract manager changed in mid-2017
 - ACFE students complete a print survey a small number of copies were sighted
 - GEALC conduct their own internal online survey of all students annually. The aim is to determine the course offering for the next year summary of 38 responses with bar graphs viewed.
 - The EO takes any items of interest to either a staff meeting (fortnightly) or the Committee (monthly).
- Tutor meeting minutes for 2019 these always include some professional development, for example discussing task bank assessment tasks and how to use them to assess ACSF scores for the progressive assessment, moderation of student assessment answers. The Education Coordinator attended cultural awareness training in March and then delivered a session for trainers.
- 4 x fortnightly Staff meeting minutes from 2019 the 5 key staff attend, not the trainers
- Committee meeting minutes 2019
- AQTF learner survey report 2018 5 responses in total
- 1 x Tutor course evaluation 2018
- Internal Audit June 2019 outcomes conducted by EO plus others, just a set of tickboxes
- Policy 4.5 Professional Development and Procedure
- Policy 8.5 Internal and External Audits states that: "internal audits will be conducted on a scheduled basis".



- Policy 8.6 Feedback
- Continuous Improvement Register this deals only with OHS issues
- Internal audit checklist 2018.

SF	1.1.1 Finding	Required Rectification(s)	
ide	e RTO provided very limited evidence of collection and analysis of data relating to training and assessment to ntify improvement opportunities and take actions to improve training and assessment.	The RTO must develop and implement effective processes for collecting and analysing data relating to training and assessment and for acting upon that data as appropriate to support continuous improvement.	
•	The AQTF learner surveys 2018 had only 5 responses in total and all had very similar written comments including: "I was totally satisfied".		
•	The RTO does not survey its own AMEP students despite no longer being provided with a summary of feedback by the contract manager		
•	The Internal Audit June 2019 checklist is a set of tickboxes with no detailed comments or evidence of an evaluative approach.		
•	The Continuous Improvement Register only deals with OHS issues, not training and assessment.		



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ELEMENT 1.2 - Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.

Non-Compliant

- Learning resources and required equipment compliant see S.1.3
- Trainers and assessor Qualifications compliant see S.1.4
- Learning and assessment resources are sufficient for the size of the groups
- Delivery Matrix, Centre timetable, Attendance Rolls there are sufficient trainers for both courses audited
- Attendance Rolls for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access
- Delivery and Assessment Strategy and Delivery Matrix for 22483VIC Course in EAL:
 - The learner cohort is identified as adults from non-English speaking backgrounds.
 - The course of 515 nominal hours is delivered part-time over 2 years. The RTO delivers 228 face-to-face hours in each of Year 1 and Year 2, totalling 456 hours, which is suitable for the learner cohort. The duration is extended as the RTO is registered for part-time delivery.
- Delivery and Assessment Strategy and Delivery Matrix for 22486VIC Certificate III in EAL (Access):
 - The learner cohort is identified as adults non-English speaking backgrounds.
 - The course of 490 nominal hours is delivered part-time over 2 years. The RTO delivers 266 face-to-face hours in each of Year 1 and Year 2, totalling 532 hours.
 This is suitable for the learner cohort. The duration is extended as the RTO is registered for part-time delivery.
 - The TAS does not list Year 2 units to be offered; it lists all possible electives.
- Interviews with Philippa Caris, Executive Officer, Ann Manning, Education Coordinator and both trainers: All staff could describe the cohort more precisely. The learner cohort has changed significantly over the last two years and is now largely Chinese, often highly educated, often part-time employed or small business owners, might have good reading and writing but low oracy due to the way they learned English in China.



- Interview with Philippa Caris, Executive Officer:
 - The electives are largely topic and project-based, for example, health, the law, art and culture. The 2020 electives for **22486VIC Certificate III in EAL (Access)** are not selected yet because it may depend on knowledge gained of students' need and interests and the interests of teachers.
 - The delivery matrix changed from 40 weeks to 38 weeks about two years ago because the students were leaving early anyway.
 - There are actually two separate classes doing two different courses in **22486VIC Certificate III in EAL (Access)** (3 units and 2 units)
 - The Centre holds a Community Consultation Breakfast annually in Oct-Nov, although they missed 2018 due to changes in courses/AMEP/staffing. Invitees include
 the local TAFE, Job Actives, other training organisations, cultural support groups, other community groups and the local church. Timetabled again for this
 November.
 - The Education Coordinator attends a Southern Region multicultural group
 - The Executive Officer attended Communities Working Together conference run by Glen Eira Council and has been requested to attend a similar external conference on their behalf.
- Community Consultation Breakfast Nov 2017 report
- Database of industry stakeholders

Database of industry stakeholders	
SF.1.2.1 Finding	Required Rectification(s)
· · ·	The RTO must ensure that its Training and
identify the cohort in sufficient detail to explain how the strategy (TAS) for both Qualifications do not	Assessment Strategy documentation identifies the learner cohort in sufficient detail to explain how the strategy is developed to meet their needs.
Evidence	outledgy to developed to most their messes.
The documents identify the learner cohort for both courses as adults from non-English speaking backgrounds.	
 At interview all staff interviewed were able to be much more specific about the learner cohort, which has changed substantially over the last two years, and to discuss how this affects delivery and assessment strategies and scheduling. 	



SF	1.2.2 Finding	Required Rectification(s)
22	186VIC Certificate III in EAL (Access)	The RTO must ensure that the Training and
	e documents which comprise the Training and Assessment Strategy (TAS) do not describe the training gram as delivered.	Assessment Strategy (TAS) describes the training program as delivered.
Ev	dence	
•	The elective units for Year 2 are not specified. At interview the Executive Officer explained why this is so, but this rationale should be stated in the TAS.	
•	The Attendance Roll shows that students who wish to do the four units allocated to Year 1 would have to attend three days per week, not two as the TAS states.	
•	The number of delivery weeks changed from 40 to 38 about two years ago but p.2 of the Delivery and Assessment Strategy still refers to a 40-week program.	
•	There are two separate classes doing two different courses but only one Delivery Matrix.	



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ELEMENT 1.3 - Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.

Compliant

- All classes are delivered at the Booran Rd premises, which is a converted house 2 x classrooms with a maximum capacity of 25 students each; 1 x computer lab with 11 PCs and a standing desk; 25 iPads for use in classrooms; 2 public computers for non-classroom use in the kitchen/dining area; a large kitchen/dining area and outside covered area used for break times and small group conversation; tutor library; 2 x office spaces; photocopy room.
- Residential Tenancy Agreement between the Uniting Church and GEALC for the use of the Booran Rd property, dated 2017 to end 2019 with an option to extend.
- Interview with Ann Manning, Education Coordinator:
 - All groups have a mix of AMEP-funded students (enrolled in an accredited Qualification and assessed) and ACFE-funded students (enrolled in non-accredited training and not assessed)
- Training and Assessment Strategy (TAS) for 22483VIC Course in EAL
- Training and Assessment Strategy (TAS) for 22486VIC Certificate III in EAL (Access)
- 22486VIC Certificate III in EAL (Access) Tues and Fri class Attendance Roll 40+ students enrolled; attendance ranged between 6 and 14. Some students come one day, some come both. Two teachers teach different units on the two days.
- 22486VIC Certificate III in EAL (Access) Wed class Attendance Roll approximately 28 enrolled, attendance ranged between 19 and 25 in Term 3
- 22483VIC Course in EAL Tues and Fri class Attendance Roll 33 enrolled, 18–23 attending. Got overcrowded so started a new class on Monday and moved some students to that, last attendance was 13 students. Some students come one day, some come both, colour-coding system to identify. Two teachers teach different units on the two days.
- 22483VIC Course in EAL Monday class Attendance Roll this class is newly formed as the existing class got too big. 5–7 students currently attending. Three others enrolled and will commence once childcare is available
- Learning resources students do not own a text. The trainers use/adapt commercial resources and 'home-made' ones based on authentic materials such as brochures and news articles
- Timetables Evidence of sufficient staffing



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ELEMENT 1.4 - Training and assessment is delivered by trainers and assessors who:

- a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and
- b) have the relevant vocational competencies at least to the level being delivered or assessed, and
- c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and
- d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.

Evidence/Documentation Reviewed

Kerry Moore - Trainer for 22483VIC Course in EAL

- Diploma of Teaching (Primary), Melbourne College of Advanced Education, 1987
- Bachelor of Education (Primary), University of Melbourne, 11/03/1992
- Graduate Certificate in TESOL, Deakin University 30/04/2004
- Graduate Certificate in Career Development, RMIT University, 25/05/2012
- TAE40116 Certificate IV in Training and Assessment, Blue Print Career Development (08/05/2019), TOID: 30978
- CV Evidence of vocational currency
- Professional Development record sheet
- TAE40116-- Evidence of professional development in competency-based training and assessment
- National Criminal History Check

Stephanie Daley - Trainer for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)

- Bachelor of Arts, Monash University 1997
- Diploma of Education (Secondary), Monash University 2002
- Postgraduate Diploma of Education specialising in TESOL, Monash University 09/12/2010

Compliant



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- TAE40110 Certificate IV in Training and Assessment including TAELLN401A, Address adult language, literacy and numeracy skills ASCET TAFE 18/04/2011
- TAEASS502 Design and develop assessment tools, Victoria University 04/02/2019
- CV Evidence of vocational currency
- · Professional development record sheet
- TAEASS502 Evidence of professional development in competency-based training and assessment
- National Police Check

Susan Hennenberg - Trainer for 22486VIC Certificate III in EAL (Access)

- Graduate Diploma in TESL, State College of Victoria Toorak, 29/03/1980
- Diploma in Education, Monash University 03/06/1977
- Bachelor of Arts, Monash University 1975
- TAE40116 Certificate IV in Training and Assessment, Chisholm Institute 03/10/2018
- CV Evidence of vocational currency
- TAE40116 from 2018 Evidence of professional development in competency-based training and assessment
- · Professional development record sheet
- National Criminal History Check

Jenny Boyarski - Trainer for 22486VIC Certificate III in EAL (Access)

- Certificate of T.E.S.O.L., Hawthorn Institute of Education 13/09/1990
- Diploma of Education, State College of Victoria 08/09/1977
- Diploma of General Studies, Caulfield Institute of Technology 31/12/1976



- TAE40116 Certificate IV in Training and Assessment, Blue Print Career Development, 30/04/2019
- CV Evidence of vocational currency
- Professional development record sheet
- TAE40116 Evidence of professional development in competency-based training and assessment
- National Police Certificate



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ELEMENT 1.5 - Assessment including Recognition of Prior Learning (RPL):

- a) meets the requirements of the relevant Training Package or accredited course
- b) is conducted in accordance with the principles of assessment and the rules of evidence
- c) meets workplace and, where relevant, regulatory requirements
- d) is systematically validated.

Evidence/Documentation Reviewed

- Interview with Philippa Caris, Executive Officer:
 - Trainers tend to do assessments in May and October because with part-time delivery, each trainer only delivers one unit per semester to a class. No students have been assessed in any units yet in 2019
 - The unit VU22384 Develop and document a learning plan and portfolio (20 nominal hours) is a portfolio collection so is assessed at the end of Year 1.
- Student Handbook for all students a brief heading in Section 3 offers RPL
- Interview with Ann Manning, Education Coordinator:
 - Students are assessed and placed in a class at the relevant LLN level so RPL is not an issue.
 - At the end of 2018, the RTO changed from delivering the Certificates in Spoken and Written English (CSWE) to the English as an Additional language (EAL)
 Framework. This has led to a problem relating to assessment materials as there were few assessment tasks available for the new EAL Framework in the online Task Bank and the trainers have struggled to adapt or create relevant tasks.
 - The RTO has never needed to conduct validation as all tasks in the AMEP Task Bank were already validated. However, there is now no requirement in the AMEP contract to use their tasks, and the limited number of validated tasks for the new EAL Framework in the Task Bank means this must change.
 - The RTO does not have a file of assessment tasks to be used for any of the units to be assessed in 2019. The trainers must modify the tasks from the preceding Qualification if possible or develop their own.

22486VIC Certificate III in EAL (Access)

VU22610 Engage in casual conversations and straightforward spoken transactions

• When Assessment tools for VU22610 Engage in casual conversations and straightforward spoken transactions were requested, the trainer supplied the unit of competency with some pencilled notes on the elements and PCs. No scenarios or role cards, mapping, recording sheet, advice to the assessor, advice to the student, observation checklist or model answers/marking guide were supplied.

Non-Compliant



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- Interview with Stephanie Daley, Trainer, 22486VIC Certificate III in EAL (Access):
 - She taught a unit similar to VU22610 Engage in casual conversations and straightforward spoken transactions last year. It is logistically difficult to assess a speaking unit she hopes to do it 1:1 but the class is large. ACFE-funded students tend to be needier but don't need to be assessed.
 - VU22384 Develop and document a learning plan and portfolio (20 nominal hours) no assessment of this has been conducted so far she plans to do summative assessment starting this term and have it finished by mid-Term 4. Although it is described as a portfolio, there is no checklist for selected documents to include for summative assessment she has advised students to include all their classwork.
 - There are not suitable assessment resources in existence for the units in the new EAL course. They are being developed ad hoc but she feels she is not paid to develop her own assessment tools with mappings, only administrative work at a lower rate.
- Assessment tools for VU22612 Read and write straightforward communications and transactional texts (80 nominal hours)
 - Assessment Cover Sheets assessor puts ticks against the elements and performance criteria, not the assessment tasks
 - Assessment Achievement Summary Grid lists a class group against the elements and performance criteria
- Completed 2018 student assessments for CSWE III SWECON302A Comprehending and participating in casual conversations
 - 5 out of 9 students achieved the module in August 2018.
 - An AMEP Bank assessment task was used so a mapping, student and teacher instructions were supplied.
 - Students were provided with feedback.

22483VIC Course In EAL

- TAS for 22483VIC Course In EAL
- Assessment tool for VU22586 Communicate basic personal details and needs this was a CSWE task from the AMEP Task Bank which also met the EAL unit
 requirements so it had student and assessor instructions, model answers and a mapping. Assessment Cover Sheet simply uses the unit elements and PCs for the
 teacher to tick against.
- 6 x completed 2018 student assessment tasks for SWETRA103A Comprehending and participating in short transactional exchanges from the CSWE. This was a task from the AMEP Task Bank, including outcomes record sheet, outcomes summary, 2 assessments tools
- 6 x completed student tasks for the unit VU22585 Use beginning language learning strategies with support



- Interview with Kerry Moore, trainer, 22483VIC Course in EAL
 - She adapted an assessment task for VU22585 Use beginning language learning strategies with support but later realised it didn't cover Elements 1 and 2. She needs to validate another task with a colleague for these two elements. There is no requirement in the AMEP contract to use their tasks. Teachers can validate a task with a colleague but trainers are not confident about doing it because they are accustomed to being provided with validated tools. Many new tasks on the task bank are mapped to the ACSF but not to the unit.
 - Results are entered onto the Assessment Achievement Summary Grid. This records achievement against the Performance Criteria, not the assessment task.
 She plans to differentiate between the two different assessments by using two different coloured pens.
 - If a student is not competent on the first attempt, she uses oral questioning to query an answer and give students an opportunity to change their answers. This level of support is acceptable at beginners and level 1. Her judgement is based on her knowledge of their performance in class. She notes in the feedback section if she has used oral questioning.
 - She gives students feedback when she returns work to them
 this is an ongoing process as part of learning.
 - No other assessment tools for this Qualification were able to be viewed.

SF	1.5.1 Finding	Required Rectification(s)
22	186VIC Certificate III in EAL (Access)	The RTO must ensure that all assessment tools used
Th	e assessment tools do not consistently meet the principles of assessment.	meet the principles of assessment.
Ev	idence	
•	The assessment tools for <i>VU22384 Develop and document a learning plan and portfolio</i> (20 nominal hours) – although it is described as a portfolio, there is no checklist for selected documents to include for summative assessment. The trainer has advised students to include all their classwork. This does not meet the principle of fairness which requires students to be informed about the assessment process.	
	There is no mapping to show how the pieces of work would contribute to evidence of competency. This does not meet the principle of validity – that the task enables the learner to demonstrate the skills and knowledge described in the unit.	
•	On the Criteria Mapping form for VU22612 Read and write straightforward communications and transactional texts, the trainer has listed 10 different items of evidence. The tasks are presented as classroom activities	



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and there is no identification that they will be used as assessment tasks. There is no cover sheet, advice to the assessor, advice to the student or model answers/marking guide. This does not meet the principle of fairness, that learners are informed about the assessment process.

- For the same unit; the Critical Aspects for assessment and evidence required to demonstrate competency' states that "Assessment must confirm the ability to use straightforward conventions and linguistic knowledge to:
 - o read a range of personal communications on straightforward topics
 - write a range of personal communications on straightforward topics <u>comprising at least one</u> appropriately structured paragraph
 - o read and complete transactional forms requiring detail according to requirements
 - o proofread and adjust text".

The 10 listed tasks do not demonstrate coverage. For example, the task <u>Socialising at a barbecue</u> is mapped to Performance Criteria 1.1–1.4:

- 1.1 Identify the context and purpose of the straightforward communications
- 1.2 Identify the main ideas referred to
- 1.3 Locate specific details
- 1.4 Note conventions and discourse features of the texts.

The task is to listen to a conversation and fill in the gaps on a sheet, which are Australian idioms. It does not ask students to carry out any of the tasks to which it is mapped. This does not meet the principle of validity – that the task enables the learner to demonstrate the skills and knowledge described in the unit.

Assessment tools VU22610 Engage in casual conversations and straightforward spoken transactions were
supplied as a copy of the unit of competency with some pencilled notes on the elements and PCs. No
scenarios or role cards, mapping, recording sheet, advice to the assessor, advice to the student, observation
checklist or model answers/marking guide were supplied. This does not meet the assessment principles of
validity, in relation to enabling learners to demonstrate the skills and knowledge described in the unit; or
reliability, in terms of enabling consistent assessment judgements.



SF.	1.5.2 Finding	Required Rectification(s)
Ass	sessment tools are not systematically validated.	The RTO must ensure that the assessment tools it
Evi	dence	uses are systematically validated.
•	The RTO made the decision to change from CSWE to EAL Framework in late 2018. This would require the RTO to commence validating at least some of its own assessment tools as they could not rely on the Assessment Task Bank having suitable tasks; however, validation so far has been ad hoc as new assessment tasks are developed, and has not used robust validation tools and processes.	
•	There is no validation schedule or plan for the future.	



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2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.

Compliant

- Pre-Training Learner Assessment v4.0 a record sheet which contains space for outcomes in the five macro-skills and for detailed observations which may indicate a learner's ability, such as poor handwriting or poor auditory perception
- Interview with Ann Manning, Education Coordinator ACFE pre-accredited students have a 40-minute interview and LLN assessment whereas the AMEP initial interview and assessment is allocated 2 hours as the contract requires a much more detailed assessment. All LLN assessments are conducted by either the Education Coordinator or Kerry Moore, Trainer, 22483VIC Course in EAL
- EAL and Adult Literacy Enrolment Manual
- AMEP Streamlined Initial Assessment Kit very detailed and comprehensive, especially at the lower levels
- 12 x completed LLN assessments, 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)
- 12 x Enrolment forms
- 12 x Individual Learner and Pathway Plans
- Training Plan and Student Obligations v2.0 for non-AMEP
- Student Handbook v4.0 for all students
- AMEP Student Handbook includes information about childcare placement, pathways, contact details for a range of settlement services, student feedback and complaints
- Client Checklist of documents in student file.
- The Enrolment Form, Student Handbook and Code of Conduct are available translated into Mandarin, and the instructions for applying for a USI are available translated into Mandarin and Cantonese
- Interview with Stephanie Daley Trainer for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access) She can record any student notes on a sheet of paper stapled in the front of the roll, for the information of other teachers sharing the class.



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2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.

Non-Compliant

- Policy 4.5 Professional Development and Procedure
- Policy 8. Quality Assurance this states that there is a Quality Assurance and Continuous Improvement Sub-committee within the Committee of Management, that the Executive Officer is on it, that quarterly meetings are held as part of the CoM monthly meetings, and that it conducts an annual internal audit.
- Policy 8.1 Continuous Improvement
- Policy 8.5 Internal and External Audits
- Policy 8.6 Feedback
- Interview with Philippa Caris, Executive Officer:
 - The Quality Assurance and Continuous Improvement Sub-committee doesn't actually meet or contribute to meetings, since all members are volunteers; they
 decided to meet only if a matter arose. Quality is included in the Executive Officer's monthly report if there is an issue.
 - Continuous improvement issues are often dealt with informally and verbally because they are a small organisation operating out of one site.
 - AMEP students complete an online survey. The RTO used to receive a feedback summary but have not received this since the contract manager changed in mid-2017
 - The Centre holds a Community Consultation Breakfast annually in October/November, although not in 2018. The Executive Officer and Education Coordinator attend regional and local multicultural umbrella groups See S.1.2.
- Internal audit June 2019 outcomes
- AQTF learner survey report 2018 5 responses in total
- ACFE students print survey— a small number of copies sighted
- GEALC internal online students survey 38 responses in total
- Continuous Improvement Register OHS only
- Community Consultation Breakfast Nov 2017 report



- 1 x Tutor course evaluation 2018
- Tutor meeting minutes for 2019
- 4 x fortnightly Staff meeting minutes from 2019
- Committee of Management meeting minutes 2019

Committee of Management meeting minutes 2019	
SF.2.2.1 Finding	Required Rectification(s)
The RTO provided only limited evidence of collection and analysis of data relating to client services to identify improvement opportunities and take actions to improve them.	The RTO must ensure that it collects and analyses data relating to client services in order to identify
Evidence	improvement opportunities and take actions to improve them.
The Quality Assurance and Continuous Improvement Sub-committee referred to in Policy 8. Quality Assurance does not actually function as described	uiciii.
Student survey responses are small in number	
The RTO does not survey its own AMEP students despite no longer being provided with a summary of feedback by the contract manager	
The Internal Audit June 2019 checklist is a set of tickboxes with no detailed comments or evidence of an evaluative approach.	
The Continuous Improvement Register only deals with OHS issues, not client services.	



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2.3 - Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.

Non-Compliant

- Website http://gealc.org.au/
- Other print-based marketing materials Course Brochure Term 3 2019; flyer for EAL Beginners, EAL III; EAL Timetable Term 3 2019
- Interview with Ann Manning, Education Coordinator:
 - Once a student enrols, they get a receipt for payment, a Student Handbook and a timetable.
 - All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer. Privacy and similar issues are explained to them. Low level applicants generally bring a family member/friend to interpret for them. The Finance Officer (working 2 days per week) speaks Mandarin and assists when needed and available.
- Mandarin and/or Cantonese translations of the Enrolment Form, Student Handbook, the Code of Conduct and the instructions for applying for a USI
- Privacy Notice and Student Declaration v2.0
- Student Acknowledgement of Obligations v1.0
- Client Code of Conduct v3.0
- 12 x Enrolment forms and Individual Learning Plans, 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)
- Interview with Philippa Caris, Executive Officer:
 - The RTO is aware of some of these shortcomings and has actually newly developed, but not yet used, a form which should meet some of these needs.

SF.2.3.1 Finding	Required Rectification(s)
The RTO does not provide accurate enrolment documentation to clients prior to enrolment.	The RTO must provide accurate enrolment
Evidence	documentation to clients prior to enrolment.
• The enrolment forms are not completed using the correct Qualification code or title. Abbreviated names for the Qualification are used, such as 'EAL 3' or 'Wed Level 3". Students do not receive an accurate record of the Qualification or units they are enrolling in.	



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 Neither the marketing materials, the Enrolment Form nor the Individual Learning Plan specify the units students will be studying.
 There is no record of the specific units in the enrolment except on the bottom of the hard copy Attendance Roll for a particular class. These are only for Year 1 of the two-year course.

2.4 - Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.

Not audited



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2.5 - Learners receive training, assessment and support services that meet their individual needs.

Compliant

- Pre-Training Learner Assessment v4.0 a record sheet which contains space for outcomes in the five macro-skills and for detailed observations which may indicate a learner's ability, such as poor handwriting or poor auditory perception
- Interview with Ann Manning, Education Coordinator:
 - ACFE pre-accredited students have a 40-minute interview and LLN assessment whereas the AMEP initial interview and assessment is allocated 2 hours as the contract requires a much more detailed assessment. All LLN assessments are conducted by either the Education Coordinator or Kerry Moore, Trainer, 22483VIC Course in EAL
- EAL and Adult Literacy Enrolment Manual
- AMEP Streamlined Initial Assessment Kit very detailed and comprehensive, especially at the lower levels
- 12 x Enrolment forms and completed LLN assessments, 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)
- 12 x Individual Learner and Pathway Plans
- Student Handbook v4.0
- AMEP Student Handbook includes information about childcare placement, pathways, contact details for a range of settlement services, student feedback and complaints
- The Enrolment Form, Student Handbook and Code of Conduct are available translated into Mandarin, and the instructions for applying for a USI are available translated into Mandarin and Cantonese
- Interview with Stephanie Daley, Trainer for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access):
 - She can record any student notes for the information of other teachers sharing the class.
 - She makes reasonable adjustment for students as appropriate.
- Interview with Kerry Moore, Trainer for 22483VIC Course in EAL: She makes reasonable adjustment for students as appropriate.



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2.6 - Learners have timely access to current and accurate records of their participation and progress.

Non-Compliant

Evidence/Documentation Reviewed

- Student Handbook, AMEP Student Handbook
- Staff Handbook V.3
- Interview with Philippa Caris, Executive Officer, and Ann Manning, Education Coordinator:
 - Until mid-2017 all Certificates were issued by the national program contract manager through the AMEP Reporting and Management System (ARMS) central database. The RTO did not keep its own records of module completion as it had open access to ARMS. Since the contract manager changed in mid-2017, the RTO no longer has open access to ARMS. Since then, the RTO has not issued any Certificates or Statements of Attainment, only its own Statements of Participation. It has developed GEALC templates for Certificates and Statements of Attainment, for use later in 2019. However, the RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled.
 - Students can ask the trainer and see their progress on the Attendance Roll.
- The RTO was unable to provide to the auditor a list of students to whom Certificates or Statements of Attainment were issued in 2018 as they have never maintained their own records and no longer have access to ARMS.
- The hard copy 2018 Assessment Achievement Summary Grids were mislaid after the outcomes were entered into the ARMS database.

SF.2.6.1 Finding	Required Rectification(s)	
The RTO has not provided learners with timely access to current and accurate records of their participation and progress.	The RTO must ensure that it can provide learners with timely access to current and accurate records of their	
Evidence	participation and progress.	
 The RTO was unable to provide to the auditor a list of students to whom Certificates or Statements of Attainment were issued in 2018. 		
 The hard copy 2018 Assessment Achievement Summary Grids were mislaid after the outcomes were entered into the ARMS database. 		



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The RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled.		
SF.2.6.2 Finding	Required Rectification(s)	
The RTO does not effectively communicate to learners and to staff about how learners can access records of their participation.	The RTO must effectively communicate to learners and to staff about how students can access records of their	
Evidence	participation.	
There is no information about how students can access records of their participation in any of the Student Handbook, the AMEP Student Handbook or the Staff Handbook V.3.		



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2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.

Non-Compliant

Evidence/Documentation Reviewed

- Policy 8.7 Complaints and Appeals
- Complaints and Appeals Form
- Student Handbook only describes an internal process
- AMEP Student Handbook describes escalation of a complaint to the AMEP Program in the Department of Education or Commonwealth Ombudsman
- Interview with Philippa Caris, Executive Officer, and Ann Manning, Education Coordinator:
 - There has never been a complaint from a student.
 - Staff receive information about the complaints process during meetings.

SF.2.7.1 Finding	Required Rectification(s)
The RTO's policy and procedures to address complaints and appeals do not include reference to escalation to the VRQA or the National Complaints hotline.	The RTO's policy and procedures to address complaints and appeals must include reference to
Evidence	escalation to the VRQA or the National Complaints hotline.
The RTO's Policy 8.7 Complaints and Appeals does not mention escalation to the VRQA or the National Complaints hotline.	
Neither of the Student Handbooks mention escalation to the VRQA or the National Complaints hotline.	



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3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.

Non-Compliant

Evidence/Documentation Reviewed

- Website http://gealc.org.au/, print marketing materials
- Trainers qualifications are compliant see S.1.4
- Facilities are adequate and sufficient see S.1.3
- Pre-Training Learner Assessment v4.0
- Timetable, Attendance rolls
- 12 x Enrolment forms
- 12 x Individual Learning Plans
- The RTO has some processes in place to ensure that clients understand the terms of their agreement with the RTO, see interview below
- Interview with Ann Manning, Education Coordinator:
 - All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer. Privacy and similar issues are explained to them. Low level applicants generally bring a family member/friend to interpret for them. The Finance Officer (working 2 days per week) speaks Mandarin and assists when needed and available.
 - The Enrolment Form, Student Handbook and Code of Conduct are available translated into Mandarin and the instructions for applying for a USI are available translated into Mandarin and Cantonese.
 - They felt students didn't understand ticking the USI privacy box so they take the applicant and any helper present through the process using the Quick Guide and all students get their own USI at home.
- Interview with Philippa Caris, Executive Officer:
 - Until mid-2017 all Certificates were issued by the national program contract manager through the ARMS central database. The RTO did not keep its own records
 of module completion as it had open access to ARMS. Since the contract manager changed in mid-2017, the RTO no longer has open access to ARMS. Since
 then, the RTO has not issued any Certificates or Statements of Attainment, only its own Statements of Participation. It has developed GEALC templates for



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Certificates and Statements of Attainment, for use later in 2019. However, the RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled.

SF.3.1.1 Finding	Required Rectification(s)			
The RTO's agreement with students does not adequately detail the services to be provided.	The RTO's agreement with students must adequately			
Evidence	detail the services to be provided.			
The enrolment forms are not completed using the correct Qualification code or title. Abbreviated and internal names for the Qualifications are used, such as 'EAL 3' or 'Wed Level 3".				
Neither the marketing materials, the Enrolment Form nor the Individual Learning Plan specify the units students will be studying.				
SF.3.1.2 Finding	Required Rectification(s)			
The RTO's management of operations has not ensured that clients receive the Certificates or Statements of Attainment to which they are entitled in a timely manner.	The RTO's management of operations must ensure that clients receive the Certificates or Statements of			
Evidence	Attainment to which they are entitled in a timely manner.			
The RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled.				



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3.2 - The RTO uses a systematic and continuous improvement approach to the management of operations.

Compliant

- GEALC 2018 Annual Report includes Strategic Goals, Treasurer's Report, Education Report, Executive Officer's Report, Finance Report, Independent Auditor's Report published in hard copy and available
- Organisational structure and reporting lines diagram
- Committee of Management meeting minutes 2019 meetings cover a full range of issues
- 4 x fortnightly Staff meeting minutes from 2019 meetings are held regularly and attended consistently
- Internal Audit June 2019 outcomes
- Continuous Improvement Register for OHS issues
- Interview with Philippa Caris, Executive Officer:
 - Lots of continuous improvement issues are dealt with informally and verbally because they are a small organisation operating out of one site.
 - The RTO changed venues while renovations are being undertaken by the landlord (Anglican Church) at the original site. A lot of work has been put into improving
 the current facility to meet standards and with the growth in student numbers, the RTO hopes to retain this site also once the original site becomes available again.
 - Some of the issues identified during audit are in the process of being dealt with, such as the development of a new enrolment summary form and the need to keep own records.
- Interview with Ann Manning, Education Coordinator:
 - Tutor meetings always include some professional development, for example discussing task bank assessment tasks, moderation of student assessment answers.
 - The Education Coordinator attended cultural awareness training in March and then delivered a session for trainers.
- Tutor meeting minutes 2019 meetings are held regularly and attended consistently.
- Employee Induction Checklist
- Policies of GEALC Inc v.6.0 31/01/2019 Online Policy Manual
- Policy 8.5 Internal and External Audits



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- Policy 4.5 Professional Development and Procedure
- Policy 8.6 Feedback

3.3 - The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.

Not audited

3.4 - The RTO manages records to ensure their accuracy and integrity.

Non-Compliant

- Policy 2.7 Records Management and Version Control
- 12 x student files 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access), including enrolment forms, LLN assessments and some completed student assessments
- Attendance Rolls for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access) AMEP attendance must be submitted fortnightly through ARMS
- Student File Contents Checklist
- The RTO had significant problems locating requested files and data such as assessment tools for selected units, and a summary record of students who had successfully completed units of competency/modules in 2018
- Interview with Philippa Caris, Executive Officer, and Ann Manning, Education Coordinator:
 - Until mid-2017 all Certificates were issued by the national program contract manager through the ARMS central database. The RTO did not keep its own records of module completion as it had access to ARMS. Since the contract manager changed in mid-2017, the RTO no longer has open access to ARMS. Since then, the RTO has not issued any Certificates or Statements of Attainment, only its own Statements of Participation. It has this year developed GEALC templates for Certificates and Statements of Attainment, for use later in 2019.
 - However, the RTO cannot ascertain if any students from the period mid-2017 to end 2018 have received any Qualifications or Statements of Attainment to which they are entitled.
 - The handwritten hard copy 2018 Assessment Achievement Summary Grids were mislaid after the outcomes were entered into the ARMS database.



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- Interview with Kerry Moore, trainer, 22483VIC Course in EAL:
 - Two tasks are needed to cover VU22585 Use beginning language learning strategies with support. Results are entered onto the Assessment Cover Sheet and the Assessment Achievement Summary Grid. These record outcomes against the elements and Performance Criteria, not the assessment task/s. She will differentiate between the two different assessment outcomes by using two different coloured pens.

SF	3.4.1 Finding	Required Rectification(s)
Th	e RTO has not managed its records to ensure they are accurate and complete.	The RTO must develop systems to manage its records
Ev	dence	to ensure they are accurate and complete.
•	The enrolment forms are not completed using the correct QUALIFICATION code or title. Abbreviated and internal names for the Qualifications are used, such as 'EAL 3' or 'Wed Level 3". No units are specified.	
•	The Assessment Cover Sheet and the Assessment Achievement Summary Grid do not allow teachers to record assessment outcomes for more than one assessment task. A trainer stated at interview that she would differentiate between two different assessment outcomes by using two different coloured pens.	
•	The RTO had significant problems locating requested files and data such as assessment tools for selected units, and a summary record of students who had successfully completed units of competency/modules in 2018.	
•	The RTO was unable to provide to the auditor a list of students to whom Certificates or Statements of Attainment were issued in 2018 as they have never maintained their own records and no longer have access to ARMS.	
•	The handwritten hard copy 2018 Assessment Achievement Summary Grids were mislaid after the outcomes were entered into the ARMS database.	



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Detailed Findings – 2016 VRQA Guidelines for VET Providers

GUIDELINE 1.1 - An RTO must ensure that it has a current strategic plan and a detailed business plan which have been approved by its governing body.

- a) An RTO ensures the strategic plan details the overall vision, mission, board of directors and strategic directions of the RTO and clearly indicates that provision of vocational education is a primary purpose of the RTO.
- b) An RTO ensures the business plan details the operational and workforce development arrangements for a three year period that incorporates:
 - i. description of the business including an organisation chart, courses, location(s) and facilities
 - ii. a continuous improvement plan or risk management strategy
 - iii. a work force development plan
 - iv. strategic alliances with other education or service providers or third party arrangements
 - v. training and assessment delivery including proposed facilities and delivery hours

GUIDELINE 1.2 - An RTO demonstrates its financial viability and its capacity to sustain quality VET into the future by ensuring it has a three-year financial plan that includes:

- a) projected student enrolments by qualifications
- b) a range of financial indicators, including
 - i. cash flow
 - ii. current ratio of total current assets versus total current liabilities (equal to or greater than 1)
 - iii. debt ratio Total Liabilities/Total Assets (equal to or less than 1)
- c) the VET provider shows that it has a financial guarantor with the capacity to service the guarantee and/or to demonstrate sufficient working capital to operate for at least 6 months without tuition fees.
- d) details about whether any person involved in the management or provision of courses by the RTO meets any of the descriptions listed in section 4.3.11(2) of the Act.

Not Audited in Phase 2 audit

Not audited in Phase 2 audit



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GUIDELINE 1.3 - An RTO ensures that it has management systems that include:

- a) management information including:
 - I. details of company incorporation in Australia (alternatively evidence of being an incorporated body in receipt of government funds)
 - II. a physical address of the company in Victoria for the purposes of serving notices
 - III. details of the directors, CEO/PEO and senior management members with associated police checks and Working With Children Checks if students are under 18 years of age
 - IV. confirmation that at least one Director or CEO/PEO has his/her principal residence in Victoria
 - V. contact arrangements for the CEO/PEO including during holidays and other closure periods
 - VI. a physical addresse for the location of financial, student and staff records including archives and computer back up storage
- b) a financial management system including a system for managing student fee payments and student refunds
- c) a student records management system that includes the capacity to provide the VRQA with AVETMISS compliant data and to ensure that copies of student records are
 - not able to be withheld from the RTO: and
 - II. able to be provided in electronic and print versions, at no cost to the VRQA in the event that the VET provider ceases operations
- d) a staff records management system including arrangements which ensure that for each staff member involved in training and assessment, the RTO holds verified documentation indicating each staff member's qualification and skills.

GUIDELINE 1.4 - An RTO ensures that it has appropriate governance structures that includes:

- a) transparent governance and ownership arrangements, such as a Board of Directors, governing council, executive management and academic management
- b) a governance structure that includes appropriate appointments of persons for oversight of academic/educational integrity and quality assurance, such that:
 - i. for an RTO with anticipated ongoing operation of less than 150 equivalent full time students or an annual student fee turnover of less than \$1.5m per annum, persons are appointed with suitable qualifications and experience; and
 - ii. for all other RTOs, a governance committee is established that includes individuals who are independent of the RTO's ownership and are employed with suitable qualifications and experience
- c) a CEO/PEO and members of the RTO's senior management team with appropriate qualifications and educational experience.

Not audited in Phase 2 audit

Not audited in Phase 2 audit



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Addit Date: 1	9-20 August 2019	KTO. Glen Ella Addit Leanning Centre Inc.	
	written agreement.	on its behalf by a third party the provision of those services is the	Not audited
	 A third party means any party that provides services on employment with the RTO. 	behalf of the RTO but does not include a party to a contract of	
	 Services mean training, assessment, related educations prospective students, but does not include student coun 	al or support services and/or any activities related to the recruitment of nselling, mediation or ICT support services.	
	2.2 – An RTO ensures that any third party delivering servith the VRQA:	vices on its behalf is required, under a written agreement, to	Not audited
a) by p		ests from the VET Regulator relevant to the delivery of services; and operations.	
GUIDELINE behalf:	2.3 – An RTO notifies the VRQA of any written agreement	t entered into under Guideline 2.2 for the delivery of services on its	Not audited
*	in 30 calendar days of the agreement being entered into or purs first; and	rior to the obligations under the agreement taking effect, whichever	
b) with	in 30 calendar days of the agreement coming to an end.		
CHIDELINE	2.4. Information substher discominated directly by an D	TO as he another newly an ite habelf is both accurate and factual	Not audited
	2.4 – Information, whether disseminated directly by an R luding by:	TO or by another party on its behalf, is both accurate and factual,	Not audited
b) dist	ifying whether a third party is recruiting prospective students to inguishing where it is delivering training and assessment on be vered on its behalf by a third party.	for an RTO on its behalf; and behalf of another RTO or where training and assessment is being	



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Not audited GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO t provides, in print or through referral to an electronic copy, current and accurate information that: enables the student to make informed decisions about undertaking training with the RTO and b) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, Not audited including in relation to any relevant changes to existing or new third party arrangements or changes in ownership. GUIDELINE 2.7 - An RTO has a complaints policy to manage and respond to allegations involving the conduct of: Not audited a) the RTO, its trainers, assessors or other staff: a third-party providing services on the RTO's behalf, its trainers, assessors or other staff; or a student of the RTO. GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, Not audited made by an RTO or a third-party providing services on the RTO's behalf.



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GUIDELINE 3.1 In addition to the requirements specified in Guidelines 3.2 and 3.3, an RTO's training and assessment is only delivered only by persons who have:

Compliant

- a) vocational competencies at least to the level being delivered and assessed;
- b) current industry skills directly relevant to the training and assessment being provided; and
- c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

Kerry Moore - Trainer for 22483VIC Course in EAL

- Diploma of Teaching (Primary), Melbourne College of Advanced Education, 1987
- Bachelor of Education (Primary), University of Melbourne, 11/03/1992
- Graduate Certificate in TESOL, Deakin University 30/04/2004
- Graduate Certificate in Career Development, RMIT University, 25/05/2012
- CV Evidence of vocational currency
- Professional Development record sheet
- TAE40116 Evidence of professional development in competency-based training and assessment

Stephanie Daley - Trainer for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)

- Bachelor of Arts, Monash University 1997
- Diploma of Education (Secondary), Monash University 2002
- Postgraduate Diploma of Education specialising in TESOL, Monash University 09/12/2010
- CV Evidence of vocational currency
- Professional development record sheet
- TAEASS502 Evidence of professional development in competency-based training and assessment



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Susan Hennenberg - Trainer for 22486VIC Certificate III in EAL (Access)

- Graduate Diploma in TESL, State College of Victoria Toorak, 29/03/1980
- Diploma in Education, Monash University 03/06/1977
- Bachelor of Arts, Monash University 1975
- CV Evidence of vocational currency
- TAE40116 from 2018 Evidence of professional development in competency-based training and assessment
- Professional development record sheet

Jenny Boyarski - Trainer for 22486VIC Certificate III in EAL (Access)

- Certificate of T.E.S.O.L., Hawthorn Institute of Education 13/9/1990
- Diploma of Education, State College of Victoria 08/09/1977
- Diploma of General Studies, Caulfield Institute of Technology 31/12/1976
- CV Evidence of vocational currency
- Professional development record sheet
- TAE40116 Evidence of professional development in competency-based training and assessment



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GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.

Compliant

Kerry Moore - Trainer for 22483VIC Course in EAL

• TAE40116 Certificate IV in Training and Assessment, Blue Print Career Development (08/05/2019), TOID: 30978

Stephanie Daley - Trainer for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)

- TAE40110 Certificate IV in Training and Assessment including TAELLN401A, Address adult language, literacy and numeracy skills ASCET TAFE 18/04/2011
- TAEASS502 Design and develop assessment tools, Victoria University 04/02/2019

Susan Hennenberg - Trainer for 22486VIC Certificate III in EAL (Access)

• TAE40116 Certificate IV in Training and Assessment, Chisholm Institute 03/10/2018

Jenny Boyarski - Trainer for 22486VIC Certificate III in EAL (Access)

• TAE40116 Certificate IV in Training and Assessment, Blue Print Career Development, 30/04/2019



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GUIDELINE 3.3 Where a person conducts assessment only, an RTO ensures that the person has the qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1 of these Guidelines.

GUIDELINE 3.4 Where the RTO, in delivering training and assessment, engages an individual who is not a qualified trainer and/or assessor, the individual works under the supervision of a qualified trainer and/or assessor and must not determine assessment outcomes.

GUIDELINE 3.5 An RTO ensures that any individual working under the supervision of a trainer:

a) holds the skill set defined in Item 4 of Schedule 1 of these Guidelines;
b) has vocational competencies at least to the level being delivered and assessed; and
c) has current industry skills directly relevant to the training and assessment being provided.



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GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.

Compliant

- Delivery and Assessment Strategy and Delivery Matrix for 22483VIC Course in EAL
 - The learner cohort is adults from non-English speaking backgrounds.
 - The course of 515 nominal hours is delivered part-time over 2 years. The RTO delivers 228 face-to-face hours in each of Year 1 and Year 2, totalling 456 hours, which is suitable for the learner cohort.
 - There is little or no unsupervised or self-paced learning.
- Delivery and Assessment Strategy and Delivery Matrix for 22486VIC Certificate III in EAL (Access)
 - The learner cohort is adults from non-English speaking backgrounds.
 - The course of 490 nominal hours is delivered part-time over 2 years. The RTO delivers 266 face-to-face hours in each of Year 1 and Year 2, totalling 532 hours.
 This is suitable for the learner cohort.
 - The amount of unsupervised or self-paced learning is realistic for the cohort
- Students are appropriately placed in classes:
 - Interview with Ann Manning, Education Coordinator: All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer.
 - 12 x completed LLN assessments, 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)



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GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:

Compliant

- a) the existing skills, knowledge and the experience of the student;
- b) the mode of delivery; and
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.
- Delivery and Assessment Strategy and Delivery Matrix for 22483VIC Course in EAL
 - The learner cohort is adults from non-English speaking backgrounds with an ACSF score of less than 1.
 - The course of 515 nominal hours is delivered part-time over 2 years. The RTO delivers 228 face-to-face hours in each of Year 1 and Year 2, totalling 456 hours, which is suitable for the learner cohort.
 - There is little or no unsupervised or self-paced learning.
- Delivery and Assessment Strategy and Delivery Matrix for 22486VIC Certificate III in EAL (Access)
 - The learner cohort is adults from non-English speaking backgrounds with an ACSF score of 2-3
 - The course of 490 nominal hours is delivered part-time over 2 years. The RTO delivers 266 face-to-face hours in each of Year 1 and Year 2, totalling 532 hours.
 This is suitable for the learner cohort.
 - The amount of unsupervised or self-paced learning is realistic for the cohort.
- Students are appropriately placed in classes:
 - Interview with Ann Manning, Education Coordinator: All EAL students come in for a 1:1 interview and LLN assessment with either her or Kerry Moore, experienced trainer.
 - 12 x completed LLN assessments, 6 each for 22483VIC Course in EAL and 22486VIC Certificate III in EAL (Access)



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GUIDELINE 4.3 - From 1 January 2016, to deliver any AQF qualification or assessor skill set from the Training and Education Training Not audited Package (or its successor), an RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in Schedule 2 (and the definitions of independent validation and validation) of these Guidelines. GUIDELINE 4.4 - From 1 January 2016, to deliver any AQF qualification or skill set from the Training and Education Training Package (or Not audited its successor), an RTO ensures that all trainers and assessors delivering the training and assessment hold the training and assessment qualification at least to the level being delivered, or have demonstrated equivalence of competencies. GUIDELINE 4.5 - From 1 January 2017, to deliver the training and assessment qualification specified in Item 1 of Schedule 1 of these Not audited Guidelines, or any assessor skill set from the Training and Education Training Package (or its successor), an RTO ensures all trainers and assessors delivering the training and assessment: hold the qualification specified in Item 5 of Schedule 1 of these Guidelines; or work under the supervision of a trainer that holds the qualification specified in Item 5 of Schedule 1 of these Guidelines. GUIDELINE 4.6 - An RTO ensures that any individual working under supervision holds the qualification specified in Item 1 of Schedule 1 Not audited of these Guidelines and does not determine assessment outcomes. GUIDELINE 4.7 - An application to add any AQF qualification or assessor skill set from the Training and Education Training Package (or Not audited its successor) to an RTO's scope of registration has only be granted if an RTO has: held registration for at least two years continuously at the time of adding the qualification and/or skill set to scope; and

b) from 1 January 2016, undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with

Guideline 4.3.



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GUIDELINE 5.1 - An RTO registered with the VRQA has provided an annual declaration of compliance with the AQTF Essential Conditions and Standards for Continuing Registration (the AQTF Standards) and these Guidelines, and in particular whether it:

Not audited

- a) currently meets the requirements of the AQTF Standards and these Guidelines across all of its existing scope of registration; and
- b) has met the requirements of the AQTF Standards for all AQF certification documentation which it has issued in the previous 12 months; and
- c) has training and assessment strategies and practices in place that ensure that all current and prospective students are or will be trained and assessed in accordance with the requirements of the AQTF Standards and these Guidelines.