

Newbery's Audit Guide - Standards for Registered Training Organisations (RTOs) 2015

Introduction

This document has been produced by Newbery Consulting to act as a guide to the audit evidence and questions an RTO may be required to respond to during an ASQA regulatory audit. The guide covers evidence relating to the *Standards for Registered Training Organisations (RTOs) 2015*. Of course this standard is only one component of the VET Quality Framework of which RTOs are required by the legislation to comply with, although most components of the VET Quality Framework are also covered within the standards. You can access more information on the VET Quality Framework at the following link on the ASQA website: [Click Here](#).

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Newbery Consulting is sincerely committed to supporting the Australian VET Sector and promoting high quality training and assessment. We are also committed to enabling RTOs to deal with the subjective nature of regulatory audits conducted by the National VET Regulator. Your readiness to deal with not only the core evidence requirements applicable to the standards but also being ready to deal with the auditor's personal preferences that they will no doubt impose on the audit, will mean the difference between a positive or a negative audit outcome. A wise person once said that "proper planning and preparation prevents piss poor performance". I absolutely echo that statement. We hope this document will assist you in your audit preparation.

Kind regards,

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Audit Guide – Clause 1.1

1.1 The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

What is this clause about:

You need to have a training and assessment strategy document that reflects how you deliver your training and assessment to your target cohort of learners. You might have different target cohorts such as enterprise clients and fee-for-service public courses. This would mean that the strategy you use to meet the needs of these different groups would vary and reflect the different approach in the delivery such as unit selection, mode of delivery, resourcing and duration.

A little (or a lot!) on Volume of Learning

There is a primary focus in the audit on determining if the course is of an acceptable training duration consistent with the AQF volume of learning ([click](#)). Where does volume of learning come from and what is its purpose? Clearly it comes from the AQF. It has been there in the AQF long before the current 2015 standards. It only came to prominence when it was used in these standards to place some requirement around the course duration. This was not a specified requirement in previous RTO standards. Some might say it was implied. I can tell you one thing, this was a source of auditor subjectivity, so bringing it into the current standards has at least put some clarity and objectivity around it (sort of).

The volume of learning is a dimension of the qualification's complexity. It is a guide to the notional duration of the qualification assuming that there are no factors that might otherwise reduce this duration. I personally support its introduction. I can see it is having a positive effect on the quality and structure of courses being delivered. I see RTOs now giving better consideration to the learning structure because, simply, they have to. Just to avoid the insertion of another link, I have summarised the allocated volume of learning below for our VET qualifications:

- Cert I - 600 - 1200 hours
- Cert II - 600 - 1200 hours
- Cert III - 1200 - 2400 hours
- Cert IV - 600 - 2400 hours
- Diploma - 1200 - 2400 hours
- Adv Diploma - 1800 - 2400 hours
- Grad Cert - 600 - 1200 hours

Audit Guide – Clause 1.1

- Grad Dip - 1200 - 2400 hours

Why is there a volume of learning range? Why do we say that a certificate III has a range of 1200 - 2400 hours? I find this is one of the most confused aspects of the volume of learning and there is no written guidance about this that I am aware of. The range is due to the different number of units of competency required in each qualification. For example, a Certificate III in Business requires 12 units, a Certificate III in Early Childhood requires 18 units, a Certificate III in Light Vehicle Mechanical Tech requires 36 units. So, same AQF level but vastly different expectation in respect to the volume of knowledge and skills required to be delivered. This is the reason for the range. It is not valid to say that the minimum volume of learning for all Cert III qualifications (as an example) is 1200 hours. It is not. As the number or units increase, so should your guideline for the target volume of learning. As an example, the target volume of learning for a Cert III with 18 units might be about 1500 hours, not 1200 hours which is more reflective of a volume for a Cert III with 10-12 units. This is a key factor to consider before anything else in establishing a qualifications target volume of learning.

There are push and pull factors to consider. When you consider the volume of learning, you need to approach it from both directions in terms of the factors that push it up and the factors which pull it down. I find that when I am doing an audit, the RTO will only state a total hours for the course. But what are those hours made up of? The hours are primarily comprised of the push factors which are the modes of learner engagement. These are things like classroom delivery and self-paced learning.

A very useful reference to understand what volume of learning consists of is ASQA's Users' guide to the Standards for VET Accredited Courses 2016 ([click](#)). I know it is about accredited courses, but have a read. I have been developing accredited courses for over a decade and defining the volume of learning has been front and center to that process for most of that time. This guide separates the consideration of the delivery hours and modes of learner engagement into those which are supervised and non-supervised. This is useful, as it prompts you to sub-categorise the modes of learner engagement into those which are supervised and non-supervised. The following descriptions of these have been adapted from the aforementioned guide:

- **Supervised hours** represent the supervised structured learning and assessment activity required to sufficiently address the content of each unit. Supervised hours are assigned to learning and assessment activities that are delivered via face-to-face or monitored online and/or structured distance education.
- **Unsupervised hours** represent activities that contribute to achieving the course outcomes that are not supervised by an RTO trainer or assessor. These may include activities such as non-supervised work experience, field placement, private study and/or assignment work.

So, instead of simply describing the volume as a single number of hours, I encourage clients to describe the modes of learner engagement (push factors) using these categories, such as the following example:

Audit Guide – Clause 1.1

Supervised hours

- Classroom Training = 182 hours based on 7 hours per fortnight over 26 fortnights
- Practical Skills Training = 70 hours based on 7 hours per month over 10 months
- Assessment in the workplace = 104 hours based on 4 hours per fortnight over 26 fortnightly visits

Non-supervised hours

- Self-paced study = 324 hours based on 6 hours per week over 54 weeks of study
- Work placement = 220 hours based on 6 hours per week over 54 weeks and less the 104 hours to conduct assessment in the workplace.
- Assessment Preparation = 216 hours based on 4 hours per week over 54 weeks

The total volume of learning for this course is therefore 1116 hours delivered over 54 weeks.

This example is actually a real course (Cert III - 18 units) that we have designed and which has successfully been through about 35 initial registration and addition to scope audits. I'm certainly not claiming it is as perfect and we will continue to evolve it, but it is a solid model for describing your volume of learning on the push side of the equation. You may be thinking; hang on, didn't we say that a Cert III with 18 units should have a volume of about 1500 hours? Keep that thought in mind.

Ok, what about those pull factors? Cause 1.2 identifies three things that serve to reduce the duration of training. This clause focuses on "each learner" but these factors are equally applicable at a cohort level that you may be designing a course for. ASQA do canvas this in their guide but it dances around the point and I don't see RTOs using this effectively to their advantage.

The three things that reduce the training duration are:

1. The existing skills, knowledge and the experience of the learner. So, let's say you have a target learner that are an existing worker or perhaps they have all completed a lower related qualification that had shared knowledge and skills with the qualification being developed? This means that it is likely these cohorts of learners have some existing skills and knowledge which should reduce the amount of learning required. This should reduce the expected volume of learning.
2. The mode of delivery. This refers to the mode or combination of modes used to deliver the intended training. It can also refer to the design structure of the course such as unit-by-unit, unit clustering or holistic delivery. If you deliver a course using multi modes such as part-time classroom combined with online learning and work placement as an example, then of-course this delivery model is highly efficient. There learner has greater access to learning where they

Audit Guide – Clause 1.1

benefit from both trainer facilitation and their own directed and self-directed study. It is reasonable to claim a reduced course duration based on this rationale. Equally, if you are using unit clustering in your course design (the grouping together of units for learning and assessment), this avoids the overlap of having to teach and assess the same thing on multiple occasions. This is highly efficient and should lead to significant reductions in the training duration.

3. The reduction in the number of units required to be delivered. This factor is very straight forward, if you can issue units through credit transfer or recognition of prior learning before the "training" commences, then this reduces the number of units needing to be delivered. As was explained earlier, the lower number of units, the lesser the expected volume of learning.

So, these are the factors that pull the required volume of learning down. The tricky part of considering the pull factors is establishing how much time to claim and how to explain this in the strategy. ASQA refer to this explanation as your rationale for the volume of learning. The following statement comes from the ASQA Factsheet – Amount of Training:

If your RTO is considering that its training and assessment strategy should specify a shorter timeframe than that defined in the AQF volume of learning, you will need to be able to identify and explain why there is a variation. Your training and assessment strategy may include a rationale explaining how, based on the previous skills and knowledge and needs of learners, a specific learner cohort.

In regards to our example above (Cert III with 18 units), the course was clustered with 18 units reduced to 7 clusters. This has a profound effect on reducing the required volume. I would estimate that the 1500 hours would be conservatively reduced to 1200 hours. We included a long rationale statement of which the following small section addressed the time saving through clustering:

It should be noted that some time efficiency in the delivery has been achieved through the mode of delivery using a clustered unit delivery model. This resulted in 18 units of competency being delivered in 7 unit clusters. In accordance with Clause 1.2 of the RTO Standards, this mode of delivery has led to a reduced course duration. The estimated 1500 hours of volume of learning is considered to be reduced to 1200 hours based on this mode of delivery. Clustering units of competency together according to their common work function, shared knowledge and skills means that these items can be trained and assessed more efficiently without unnecessary repetition.

In conclusion:

- Be sure to identify the target volume of learning based on how many units you have in your qualification.
- Be sure to clearly outline the delivery hours and modes of learner engagement (push factors) into their supervised and non-supervised components.
- Be sure to utilise the full kit bag of pull factors which you can validly point to as reducing the expected volume of learning.

Audit Guide – Clause 1.1	
<ul style="list-style-type: none"> • Be sure to provide sufficient detail in your TAS that explains the rationale for your expected duration and any time savings. <p>Just on a quick closing point on volume of learning. In our experience, we have not experienced (generally) auditors being dogmatic with the volume of learning. I can point to many examples of courses we have presented (through the client) to ASQA where the volume of learning was significantly below what was required with little justification in regard to valid rationale. The common thing in all of these courses was the detailed course structure and the RTO being able to demonstrate that all of the required knowledge and skills had been covered with sufficient time allocated to skill development. This is an overriding factor. If your volume is not stupid low and your learning and assessment is compliant, then you should be OK. At least that is our experience.</p>	
<p>Evidence to prepare:</p> <p>Training and Assessment Strategy (current) for each item on the scope of registration. This must identify:</p> <ul style="list-style-type: none"> – the target learner or cohort – the mode of delivery – entry requirements – licensing or regulatory requirements – language literacy and numeracy requirements – the units of competency – the planned duration and allocation of supervised and non-supervised time (detailed) – rationale for the amount of training – work placement arrangements if applicable – the learning delivery methods and activities 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – your strategy is targeting a specific learner cohort and is tailored for their needs – your selection of units of competency complies with the training package rules – you can identify the specific learning and assessment activities align to each unit of competency or cluster and show how these are sequenced and structured in the course program – your strategy complies with mandatory entry requirements, prerequisites and licensing requirements applicable to the training product being delivered – you are delivering the training product in an acceptable duration that is consistent with the AQF volume of learning – your strategy is consistent with the way your training is being delivered and <u>advertised</u> <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through the way this course is delivered? – Who is the target learner for this course and how has the course been adjusted to their needs? Do they have any pre-existing knowledge and skills?

Audit Guide – Clause 1.1	
<ul style="list-style-type: none"> – the assessment methods and tasks – the resources and equipment requirements – plan for evaluation and continuous improvement <p>A supporting training program or training schedule document (very important) that details the actual program of delivery including the planned learning and assessment activities and how these are sequenced and structured into the course.</p> <p>A detailed resource guide that identifies the physical and non-physical resources required to deliver the course. This should not be broad statements and is recommended to be quite detailed list of equipment and other resources needed for the delivery.</p> <p>A staff matrix document or equivalent (not compulsory but recommended) that identifies the nominated trainers and assessors used in the delivery of the course. This document should provide a summary of their qualifications, industry experience and recent professional development.</p> <p>Evidence of industry engagement that informed the course development (not compulsory but recommended). This should identify the industry representatives that were engaged with, the details of the meeting and the outcomes relevant to the course development.</p>	<ul style="list-style-type: none"> – What was the basis for your selection of elective units? – What are the pre-requisite or entry requirements for this course and how have you catered for them in the enrolment process? – Can you explain the design structure for the course and what was the reason for adopting this structure (i.e. unit by unit, clustered, holistic)? – What is the duration of the course and how have you determined that this is sufficient time to achieve all the specific requirements of each unit of competence? – The planned duration does not appear to be consistent with the recommended volume of learning. What is the rationale for the planned duration? – You have quite a large amount of time allocated to ‘self-paced learning’. Do you have developed self-paced learning activities that learners complete during this time? – How will training sessions be delivered in this course? Can you talk me through the training delivery strategy? – How will assessment be conducted in the course? Can you talk me through how assessment methods will be applied and show any examples of these in the program? – Can you talk me through how the work placement is organised? I am particularly interested in how you will ensure that the work placement site is suitable and if the required resources are available. How will the learner be orientated and supervised?

<p>Audit Guide – Clause 1.2</p>	
<p>1.2 For the purposes of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to:</p> <p>a) the existing skills, knowledge and the experience of the learner;</p> <p>b) the mode of delivery; and</p> <p>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.</p>	
<p>What is this clause about: This clause works in conjunction with clause 1.1. If you take the clause as read it specifically says that the RTO must determine the amount of training they provide to “each learner”. We interpret this to mean that you must engage with the learner to understand their individual pre-existing knowledge and skills, existing competency and taking into consideration the mode of delivery. These things have the effect of reducing the amount of training that the individual needs and will therefore influence the training and assessment strategy that applies to their individual situation. We think of this as an individual learning pathway. It is also valid to apply the same concepts to an entire cohort if it is applicable. An example of this may include a cohort of learners who have completed a lower level qualification where some units of competency would achieve a direct credit transfer into the higher qualification. These learners may also be existing workers and potentially have some pre-existing knowledge and skills on their entry into the program. In this scenario, it is appropriate to take into consideration a reduced amount of training for the cohort in developing the course program.</p>	
<p>Evidence to prepare:</p> <p>Evidence of the arrangements to engage with each learner during their enrolment to determine their existing skills and knowledge and opportunities for credit transfer and RPL.</p> <p>Evidence of how the amount of training has been adjusted based on the understanding of learner cohort or individual learners pre-existing knowledge, skills and existing competency.</p> <p>RPL arrangements that justify how an individual learners prior learning is assessed.</p> <p>Credit transfer arrangements that justify how an individual learner’s current competency is verified</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – you engage with each learner to determine if they have pre-existing knowledge and skills which may reduce the volume of learning – you can apply different modes of delivery according to each learner’s needs that may influence the amount of training required – you engage with each learner to determine their eligibility to reduce their duration of training through recognition of prior learning or credit transfer <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – How do you engage with each learner to determine the amount of training they need?

Audit Guide – Clause 1.2	
<p>Enrolment arrangements that detail the process for the learner’s enrolment and demonstrates how they are engaged during this process</p> <p>Enrolment interview or pre-training review records if applicable</p> <p>Learner records of learners who have benefited from an adjusted individual learning pathway that has reduced their overall volume of learning. This will typically be evident in learners who received RPL or credit transfer.</p> <p>Evidence of training needs analysis of a cohort that may have determined their pre-existing knowledge and skills and existing competency.</p>	<ul style="list-style-type: none"> – Can you provide examples of how you have adjusted the training program for an individual learner based on their individual entry level into the qualification? – How do you customise the training and assessment strategy or training plan based on the individual learner’s requirements? – You have allocated a considerable saving training time based on the learner’s pre-existing knowledge and skills. How did you determine this? Do you verify this entry level during the learner’s enrolment? – You have identified a saving of the training duration based on the mode of delivery. What was your rationale for determining this?

Audit Guide – Clause 1.3	
<p>1.3 The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:</p> <p>a) trainers and assessors to deliver the training and assessment;</p> <p>b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;</p> <p>c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and</p> <p>d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.</p>	
<p>What is this clause about: It is primarily about making sure that the RTO has sufficient facilities, resources, people and services to support the delivery of training and assessment consistent with its scope of registration. This obviously will vary based on the RTO's scope of registration, geographic area of delivery and delivery modes. The focus in this clause is particularly on the availability of learning resources and equipment/facilities that complement the training product being delivered. We find that auditors do not particularly focus on 1.3a (trainers) and 1.3b (support services) when auditing this clause as these items are also covered in other specific clauses that deal with these things in much more specific detail. That is not to say that these things can be ignored completely in this clause. The auditor is entitled to take into consideration if the RTO has a sufficient number of trainers and assessors for the planned number of learners. This equally applies to support services. As there is no specified benchmarks for these things (i.e. mandatory learner/trainer ratios), they are quite subjective.</p>	
<p>Evidence to prepare:</p> <p>All learning materials for all items on the scope of registration. This may include text, workbooks or reference material, session plans, training aids, handouts, electronic presentations, etc. the learning resources must complement the specified knowledge and tasks identified in each unit of competency. For some auditors this is the go to place to sample the knowledge against the learning content.</p> <p>All equipment used in the delivery of training for all items on the scope of registration.</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – you have enough qualified trainers and assessors to support the number of learners you are delivering to (links with 1.13 to 1.16) – you have appropriate access and provision to education support services for the planned number of learners (links with 1.7) – you have the learning resources such as learner guides, textbooks, session plans, presentation tools, et cetera for each training product on your scope of registration

Audit Guide – Clause 1.3	
<p>Training facilities such as classrooms, computer labs, outdoor practical areas, etc</p> <p>Staff matrix identifying trainers and assessors nominated for each training product on the scope of registration</p> <p>Equipment inventories or evidence of arrangements to support the management of equipment and resources.</p> <p>Evidence to demonstrate how equipment and resources required in the learner’s workplace are validated as available. May be some type of Workplace Equipment and Resources Checklist.</p> <p>Lease agreements for facilities if leased. Keep in mind ASQA’s health and safety requirements for educational premises Click Here</p> <p>Evidence of local government approval to operate a training business at your designated training sites.</p> <p>MOU or letter of confirmation from facility owners where these facilities are not leased and being accessed on a casual basis.</p> <p>Completed facility checklist to confirm that you have inspected the facilities and confirm their suitability for the training being delivered.</p> <p>Service agreements (or licence) with associated service providers that may provide services in support of the RTO operations, such as equipment hire, commercial learning resources, et cetera</p>	<ul style="list-style-type: none"> – you have the equipment and facilities required for your mode of delivery and according to the requirements of each unit of competency being delivered <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can we take a tour of your training facilities? – I would like to see all of the learning materials for the following unit of competence. Do you have any guide that shows how the knowledge requirement within the units is addressed? – Do you have associated support materials that enable the implementation of the training strategy? I am specifically interested in seeing session plans, training aids, handouts, electronic presentations, etc. – I am auditing the unit of competency CHCECE005 - Provide care for babies and toddlers, and just looking at the required knowledge in the unit, can you show me within your learning material where you address the required knowledge of “guidelines for infection control” (As an example)? – Can you show me the equipment that is available to support the delivery of training for this unit of competence? For instance, this unit relates to observing the candidate conducting food preparation, do you have appropriate space, facilities and equipment for the candidate to be assessed undertaking food preparation and applying food hygiene practices? (As an example). – How do you ensure that specific equipment required to support workplace training is available? Do you have a process to validate this or negotiate this with the employer?

Audit Guide – Clause 1.3	
All assessment materials for all items on the scope of registration. Please refer to clause 1.8	<ul style="list-style-type: none">– Can you show me a copy of the lease for the training facilities you have nominated at these delivery locations? Alternatively, do you have an MOU or a formal / written confirmation that these venues can be leased as you need them?– Do you have local government approval to operate a training business at your designated training sites? Can you show me this please?

Audit Guide – Clause 1.4	
1.4 The RTO meets all requirements specified in the relevant training package or VET accredited course.	
<p>What is this clause about: This clause essentially requires that the training and assessment strategies and practices applied by the RTO meet the requirements of each training product sampled in the audit. It is a direct overlap with the requirements specified within clauses 1.1, 1.3 and 1.8. It requires that the training and assessment being delivered meets the requirements of the training package which of course includes the training products (i.e. Qualifications, Skill Sets and Units of Competency). Although this clause is generally always in the audit scope, it is not particularly audited separately and is informed by the compliance of outcomes after the auditor has completed their audit of clauses 1.1, 1.3 and 1.8.</p>	
<p>Evidence to prepare:</p> <p>Refer to clause 1.1, 1.3 and 1.8</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – Your arrangements for the delivery of training and assessment aligned with the training package requirements. <p>Note. This clause is what is commonly referred to as a default standard. So, if any of clauses 1.1, 1.3 or 1.8 for example are non-compliant then this clause is also non-compliant. It is actually rare for the auditor to audit this clause specifically. They tend to audit most of standard 1 which then informs the compliance outcome of this clause. We identify the following things that are typically considered to be “training package requirements”:</p> <ul style="list-style-type: none"> – qualification packaging rules – qualification entry requirements – unit of competency prerequisite requirements – specified licensing / regulatory requirements – assessment requirements (ref clause 1.8) – correct codes and titles – consistent with scope of registration <p>You should prepare for these types of questions:</p> <p>Refer to clauses 1.1, 1.3 and 1.8 for questions in support of this clause.</p>

Audit Guide – Clauses 1.5 and 1.6

1.5 The RTO's training and assessment practices are relevant to the needs of industry and informed by industry engagement.

1.6 The RTO implements a range of strategies for industry engagement and systematically uses the outcome of that industry engagement to ensure the industry relevance of:

- a) its training and assessment strategies, practices and resources; and**
- b) the current industry skills of its trainers and assessors.**

What are these clauses about: These clauses are about ensuring that the training and assessment services the RTO delivers is relevant to the needs of employers. At the end of the day we deliver skills and knowledge to people so that they can go and perform work. That work is performed for employers who have requirements in each of their workplaces and want employees who have the skills and knowledge to work effectively in their business. So, to achieve this, the RTO needs to get out and talk to employers and establish what employers need so that this can be integrated into the training and assessment services the RTO delivers. This clause goes to the core of what we do in the VET sector and it also makes good business development sense.

Evidence to prepare:

Evidence of the strategies the RTO applies to engage with industry. This may be in the form of the policy or other strategy document that details the methods the organisation applies to engage with industry to ensure that its training and assessment is relevant to industry requirements. The standards themselves have a nice list in the glossary of what constitutes industry engagement [Click Here](#).

Evidence of industry engagement that has informed the following outcomes:

- the selection of units of competency;
- the allocation of learning methods and assessment tasks;

You must be able to demonstrate that:

- the selection of units of competency was informed by advice provided by industry
- the mode of delivery and the structure of learning activities is consistent with what industry needs
- the assessment tasks used within the course are consistent with the way that the relevant tasks are performed in the workplace (principle of assessment – validity)
- nominated trainers and assessors current skills and knowledge is consistent with current industry requirements such as codes of practice, work procedures, equipment usage and operating requirements, et cetera
- you have hard or electronic documentary evidence to demonstrate all of the above. Your verbal assertion that you engage with industry will not be sufficient

Audit Guide – Clauses 1.5 and 1.6	
<ul style="list-style-type: none"> – the incorporation of selected equipment and resources in training; and – the maintenance of current knowledge and skills of training staff. <p>It is valuable during a regulatory audit if you have hard evidence of the persons you have engage with in industry and can identify specific outcomes relating to these meetings. The evidence should substantiate how the outcomes above were informed.</p> <p>It is nice to have this all organised in a register but any documentary evidence is acceptable such as emails, meeting minutes, interview records, site visit records, post activity reports, industry participation in validation activities, service proposals.</p> <p>Don't forget the corresponding documents in your training and assessment materials and strategies. If you identified in a meeting with industry representative that a particular unit of competency needed to be included as an elective, then the relevant evidence to demonstrate how this need was adopted will be within the training and assessment strategy and the relevant learning and assessment resources for that unit.</p>	<ul style="list-style-type: none"> – you apply a range of strategies to engage with industry and have a systematic process to act on the outcomes from industry engagement <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through what strategies you apply to engage with industry? – Who do you identify as industry (ideally “industry” is the likely employer of your learners)? – Do you have a program or schedule of activities that guides your industry engagement? – Can you provide any examples or evidence of how you have engaged with industry and the outcomes it resulted in? – So, happy with what you have explained but do you have any documentary evidence or other information that supports this? – I you able to show how the engagement you have been undertaking with industry has informed the development of your trainer and assessor industry currency? – Have you identified any specific equipment or resource improvements through your industry engagement?

Audit Guide – Clause 1.7	
1.7 The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.	
<p>What is this clause about: This clause is about ensuring that every learner regardless of their individual situation has the opportunity to properly engage in learning and assessment that is aligned with their needs. It is about providing the learner support services in order to maximise the learner’s completion of the course. Good identification of the learner’s needs and alignment with relevant support services has a direct correlation to the RTO’s competency and qualification completion rates. This clause requires good arrangements to engage with learners during their enrolment pathway to determine their needs and it requires the RTO to have available support services to allocate according to the identified needs of the learner. It’s important to note that the RTO is not required to provide all possible support services. It is reasonable that a small RTO can provide basic language literacy and numeracy support, learning support services and be able to support the majority of learners who may have straight forward disabilities. Where specialist support services are outside of the RTO’s area of expertise then it is appropriate for the RTO to have referral arrangements for these specialist support services. It is also key to consider that “support needs” has a broad application under the standards. The glossary within the standards provides guidance as to the types of support services the RTO may provide. This is not simply relevant to language literacy and numeracy but applies to any individual need a learner may present with such as, disability, financial impairment, social exclusion, et cetera. It is useful when considering learner support needs to consider your learners and think outside the box in terms of what their requirements might be.</p>	
<p>Evidence to prepare:</p> <p>Enrollment policy and procedure which should identify how you engage with learners to determine their needs.</p> <p>Information in the learner handbook (or equivalent) that informs the learner about the availability of support services and how to access these.</p> <p>Enrollment application forms and associated documents which may include questions to gather information about the learner’s needs.</p> <p>Enrollment interview record where you may engage with learner to clarify the needs.</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – you have very clearly defined arrangements to engage with learners during their enrolment pathway in order to determine their individual support needs – you have established a broad offering of learner support services that align with the typical or planned learner support requirements – you can provide examples of how you identified learner support needs and provided support services – you can demonstrate how the learner is informed about the available support services and how to access these

Audit Guide – Clause 1.7	
<p>Mechanisms to assess the learner’s language literacy and numeracy skill level benchmarked with the Australian Core Skills Framework.</p> <p>Evidence of arrangements with local specialist support service providers such as specialist in language literacy and numeracy, counselling services or support services for those with cognitive impairment.</p> <p>Examples of how support services have been provided to individual learners. In the lead up to an audit, you should canvass the staff in the office and your trainers and assessors who deal with learners at the coalface. These people will be able to recall instances of how learners have presented with needs and how these needs have been addressed. It is quite critical that you can provide tangible examples of how needs were determined and supported. Documentary evidence is king! This might be enrolment records, LLN assessments, correspondence via email with service providers, meeting minutes, et cetera.</p>	<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through your process for enrolling learners? – How do you identify a learner’s support needs during the enrollment process? – How do you inform learners about the available support services and have access these? – What do you define as a learner support need? – What arrangements do you have in place to support learners? – Can you identify an example of providing support services to assist them in their course? – Can you talk me through your arrangements to assess learner LLN ability? – Have you benchmarked your LLN assessment arrangements with the Australian Core Skills Framework?

Audit Guide – Clause 1.8

1.8 The RTO implements an assessment system that ensures that assessment (including recognition of prior learning): a) complies with the assessment requirements of the relevant training package or VET accredited course; and b) is conducted in accordance with the Principles of Assessment and the Rules of Evidence.

What is this clause about: This clause is simply about assessment! ☺ Of course it's not simple at all. It involves interpreting the training package requirements through unpacking the units of competency and designing assessment resources that support the principles of assessment, the rules of evidence and the training package requirements. It's about having good assessment resources in support of every unit of competency you deliver. It is also about having good assessment instructions for the candidate and for the assessor and suitable documents to record assessment evidence. The assessment tasks must align to the units of competency and the evidence you retain must justify the assessment decision and comply with the ASQA retention requirements for completed learner assessment items [Click Here](#). If none of this makes sense to you then seek help immediately. ☺ Ok, sorry, a bit of tongue-in-cheek there. Seriously though, this is a complex clause and is where the vast majority of RTO's are found non-compliant. Assessment is one of the most subjective areas within the standards. Every auditor has their own preferences and will interpret the same requirement in the unit of competency differently. To overcome this subjectivity, you need to invest in the development of the best assessment tools you can afford and then have these reviewed by as many people as possible who know what they're looking for. There are a couple of do nots to follow when preparing for assessment:

- **Do not** simply buy commercial assessment resources and make a false assumption that these are compliant because the organisation supplying them says that they are. There are some good commercial suppliers of assessment resources (including us), but the vast majority are seriously crapola ([link](#) ☺). Always ask for a sample and review the sample to identify how much actual assessment design has gone into the activities. Most of these materials are simply the units of competency unpacked into observation tools and have converted the performance evidence statement into assessment instructions. Seriously hopeless. Buyer beware!
- **Do not** assume that the assessment materials that your friend or another RTO says have "passed" audit will be compliant at your audit. The reality is that an audit only looks at a sample and not the entire RTO's scope is sampled. As outlined above, the audit of assessment is notoriously subject. Some auditors gloss over the audit of assessment because they don't really understand assessment requirements (true). Other auditors understand assessment thoroughly and apply a high attention to detail to your assessment and its alignment to the unit of competency. I have seen assessments (same unit, same assessment resource) found compliant 30 out of 35 audits. What was unique about the 5 non-compliances? Answer: The auditor and their personal preferences and attention to detail.
- **Do not** interpret the unit of competency. Accept the unit as written in black-and-white and design your assessment to address every component of the unit of competency particularly the assessment requirements. If it says the candidate needs to be observed on 3 occasions, then do it 3 times. Don't try and be tricky and get away with only collecting partial evidence. Collect exactly the evidence that the unit of competency specifies in the context of tasks required.

Audit Guide – Clause 1.8	
<p>Sorry to be a killjoy, but be aware that it is a civil offence to issue a vet qualification or unit of competency without undertaking adequate assessment (see <i>National Vocational Education and Training Regulator Act 2011, Part 6, Division 1, Subdivision A, Section 102</i>) Click - \$21,600.00 fine! Assessment is a serious business. In some industries, the adequacy of the candidate's assessment could impair their ability to perform workplace tasks and impact on their workplace safety. Get it right.</p>	
<p>Evidence to prepare:</p> <p>For each unit or cluster of units, all assessment materials. These might include:</p> <ul style="list-style-type: none"> – Access to all learner records where actual learner assessment items and assessment records are retained. Again, note the ASQA General Direction— Retention requirements for completed learner assessment items Click Here – Assessment coversheet to record the results of the assessment. This document should bring together all of the evidence gathered in relation to the assessment of the unit. – Assessment instructions for the Assessor, Candidate and Supervisor if applicable. These should be detailed and describe the specific assessment tasks to be completed. <p>If the assessment requires the candidate to complete a document in a specific format, a document template must be provided to the candidate.</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – Your assessments meet the requirements of the training package, which means that if the unit of competency specified that the candidate must be observed five times performing a specific task then that is exactly what the assessment should include. <p>Key point.</p> <ul style="list-style-type: none"> – You have adequate assessment instructions that detail the requirements for the assessor and the candidate and support the fairness and flexibility of the assessment. We apply the following model to the development of assessment instructions: <ul style="list-style-type: none"> ○ Who: Define who is being assessed and the role of any other persons that may be contributing to the assessment in a role-play. ○ What: Specify the assessment task in terms of what the candidate must do exactly in order to demonstrate their competency. This will sometimes set limitations on the task. ○ Where: Identify the assessment context in terms of the environment and the equipment required to conduct the assessment. This may also include information about the assessment scenario. ○ When: Define the timeframe for the assessment activity ○ Why: Specify the standard of performance for the assessment. This will relate to what is being assessed and will provide a guide to the assessor about specific requirements they need to look for. ○ How: identify how the assessment will be conducted in terms of the sequence of activities from briefing the candidate through to collecting evidence and informing the candidate of the result. This should not repeat generic information that is contained elsewhere but may need to specify

Audit Guide – Clause 1.8	
<p>If assessment of knowledge is planned using written or verbal assessment, model answers for the assessment questions must be provided in order to ensure the reliability of the assessment.</p> <p>Observation assessment tools for practical or product based assessment. These should be designed to include observation criteria that relate to the specific assessment task being assessed. Do not simply copy all the performance criteria. The auditor wants to see customised observation criteria that are observable and measurable.</p> <p>Assessment mapping that shows how the assessment evidence being gathered relates to the unit of competence. This should display the mapping to elements, performance criteria, performance evidence and knowledge evidence requirements.</p> <p>Assessment policy and procedure that defines how the organisation prepares and implements the assessment.</p> <p>All RPL Assessment tools /resources for each training product on the scope of registration.</p>	<p>particular sequence or activities that are relevant to the assessment task. This should also specify any arrangements or mechanisms for reasonable adjustment.</p> <ul style="list-style-type: none"> – Your assessment task and the evidence being collected align perfectly with the tasks specified within the unit of competency and are informed by the desired workplace context to support the validity of the assessment. I have a favorite saying that I repeat frequently to clients in respect of validity: <i>“Collecting evidence of the candidate’s understanding of a task is not valid evidence of their ability to perform that task.”</i> – You are applying reliability in your assessment process which is supported by having model answers (<u>benchmark responses</u>) for written knowledge assessment, detailed observation criteria in support of observation tasks (<u>benchmark behaviours</u>) and developed examples in support of assessment projects and assignments (<u>benchmark examples</u>). – You are collecting sufficient evidence that confirms the consistency of the candidate’s performance and their ability to perform all tasks specified within the unit of competency. – You are applying arrangements to ensure that the evidence being collected is authentic and is the work of the candidate. These might include simple measures such as obtaining a declaration of authenticity from the candidate when they submit a response to an assessment task. – You are only confirming a candidate’s competency based on current evidence particularly when RPL assessment processes are being applied. Mechanisms to confirm the candidate’s current skills and knowledge might include verbal interview or knowledge assessment combined with observation assessment.
<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can I see the completed assessment records (Learner File) for the following learners please? 	

Audit Guide – Clause 1.8

- I am auditing the unit of competency XXXXXX, can you talk me through this assessment arrangement and identify how the evidence is being gathered and assessed?
- How do you ensure the reliability of your assessment?
- How did you determine the assessment tasks?
- How do you ensure that the evidence being submitted is the candidate's own work?
- I am trying to understand how you observe these tasks being performed. How do you inform the candidate of the assessment activity?
- Can you explain your approach to gathering third-party evidence? How do you verify the suitability of the third-party who is providing evidence? ([ASQA Fact Sheet](#))
- How do you prepare or support the supervisor to provide this evidence toward the assessment?
- What resources and equipment do you use in support of this assessment?
- For workplace assessment, how do you ensure that sufficient resources are available in the workplace to support the assessment.
- How do you ensure that the assessment decisions between different assessors are reliable?
- The unit of competency performance evidence statement requires the candidate to be observed performing this task five times over these range of situations, can you show me in this assessment evidence how this has been achieved?
- The unit of competency knowledge evidence statement specified the requirement for knowledge of XXXXXXXX, can you show me in the assessment evidence where this knowledge was assessed? Do you have a model answer that question?
- The unit of competency assessment conditions statement specifies the requirement that the assessment must be undertaken in a real workplace with access to the following minimum equipment. How has this been achieved and verified?
- All of these assessment materials have been commercially supplied to you. How have you customised them to align with your delivery model and target learner?
- How are assessment results being reported and recorded?

Audit Guide – Clause 1.8

- What is your process for a candidate to be re-assessed or appeal an assessment decision?
- How does the candidate receive feedback on their assessment result?
- Can you explain your approach to assessment using recognition of prior learning? Do you have a separate RPL assessment tools for this unit or qualification? Can I see an example of RPL you have completed?
- There is minimal or no observations or evidence being recorded by the assessor in this assessment record, I need to see valid evidence of the assessment as opposed to ticks on sheets of paper. Do you have any further evidence in support of this assessment? ([ASQA General Direction](#))

Audit Guide – Clause 1.9/1.10/1.11

1.9 The RTO implements a plan for ongoing systematic validation of assessment practices and judgements that details: a) when assessment validation will occur; b) which training products will be validated; c) who will lead and participate in validation; and d) how the outcomes will be documented and acted upon.

1.10 Each training product is validated at least once every five years, with at least 50% of products validated within the first three years of each five year cycle taking into account the relative risks of all of the training products on the RTO's scope of registration, including those risks identified by the VET Regulator.

1.11 For the purposes of Clause 1.9, systematic validation of an RTO's assessment practices and judgements is undertaken by one or more persons who are not directly involved in the particular instance of delivery and assessment of the training product being validated, and who collectively have:

- a) vocational competencies and current industry skills relevant to the assessment being validated;
- b) current knowledge and skills in vocational teaching and learning; and
- c) the training and assessment qualification or assessor skill set referred to in Item 1 or 3 of Schedule 1.

What are these clauses about: These clauses specify the requirement for the conduct of assessment validation. The standards define assessment validation as a quality review process. This is to distinguish it from a quality control process. The difference is important as a quality review process is something that is conducted whilst the item being reviewed is being actually used as opposed to a quality control process which involves undertaking a review on something before it is implemented. So, it is important to identify that the assessment validation under the model specified within these standards is conducted post implementation after the assessment has had an opportunity to be used by assessors with candidates. The standards also specify that assessment validation involves checking that the assessment produces valid, reliable, sufficient, current and authentic evidence. So it focuses the criteria for validating assessment based on the rules of evidence and two principles of assessment (validity and reliability). I personally would recommend that you also consider flexibility and fairness in your validation criteria also. It includes reviewing a statistically valid sample of the assessments. This requires you to determine how many assessments you have completed for the unit of competency being validated and then to calculate a statistically valid sample size. There are numerous sample size calculators available on the web. ASQA nominate the following as being suitable: <http://www.raosoft.com/samplesize.html> In the conduct of assessment validation, the clause specifies particular competency requirements for the person who is leading the validation activity. Of particular note is the requirement that this person must not have been directly involved in the particular instance of assessment which is being validated. This means that this person does not necessarily need to be external of the organisation but does need to be non-biased and independent of the assessment being validated. Your organisation will obviously need to apply assessment validation process which will result in a systematic approach being applied and the outcomes of assessment validation used to improve future assessment. We strongly recommend the following document as a fantastic model to support your conduct of assessment validation:

[Maximising confidence in assessment decision-making: Resource kit for assessors](#)

Audit Guide – Clause 1.9/1.10/1.11	
<p>Evidence to prepare:</p> <p>A plan for assessment validation to ensure that each training product is validated at least once every five years, with at least 50% of products validated within the first three years of each five year cycle.</p> <p>Note. This requirement came into effect on first of April 2015. This means that at least 50% of the training products that are on the RTO's scope of registration must be validated no later than the 1st April 2018 and the remaining items on the RTO's scope must be validated no later than the 1st April 2020. Get on with it!</p> <p>Evidence of the assessment validation procedure and the model of assessment validation used by the organisation.</p> <p>Evidence of completed assessment validation that shows the process being applied, the statistically valid sample selected for the validation activity and the outcomes that were identified and how these are acted on.</p> <p>Evidence of competency and currency of those persons who are leading assessment validation who are not directly involved in the particular instance of delivery and assessment of the training product being validated, and who has:</p> <ul style="list-style-type: none"> – vocational competencies and currency – current knowledge and skills in vocational teaching and learning – current competency in training and assessment 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You must have an assessment validation plan that identifies when assessment validation for each training product will be validated, what training products are being validated from your scope of registration, who will lead and assist in the assessment validation and how the outcomes of assessment validation will be used to improve the assessment. – You must have an assessment validation plan that complies with the 50% (3 years) - 100% (5 years) requirement. <p>Key point. The ASQA fact sheet (click) says that: <i>“If you are validating a qualification, at least two units of competency should be sampled when validating a qualification.”</i> ASQA has also provided our clients advice that if the RTO has no delivery in a qualification it has on its scope of registration, then the RTO is unable to undertake the assessment validation and ASQA would not expect assessment validation to have occurred under these circumstances.</p> <ul style="list-style-type: none"> – You have conducted assessment validation in accordance with your documented plan and can demonstrate how the outcomes of assessment validation have been acted on to improve assessment. – You have only utilised persons to lead assessment validation that our competent in training and assessment and competent in the unit of competency being validated and who were not directly involved in the particular instance of assessment being validated. It should be noted that evidence of these person's competency should be consistent with that expected of trainers and assessors.

Audit Guide – Clause 1.9/1.10/1.11

You should prepare for these types of questions:

- Can you talk me through your assessment validation process? Do you have a policy or procedure?
- Do you have an assessment validation plan? How have you determined that you will achieve validation of 50% of your scope of registration within the first three years?
- How did you select units of competency for each qualification? Did you apply a risk assessment model to the selection of these units?
- Can I see the record of assessment validation that is indicated on the plan as having been completed on this date?
- Can we trace these outcomes through to your continuous improvement register or see how these improvements were actually made in the assessments?
- Do you have a record of the learner sample you used to undertake this assessment validation?
- Can I see the qualifications of this person who is nominated to lead the assessment validation in the validation plan?
- Was this person involved in the conduct of this assessment with this cohort of learners? Can we access other learner records from this cohort?

Audit Guide – Clause 1.12	
1.12 The RTO offers recognition of prior learning to individual learners	
<p>What is this clause about: This clause is intended to ensure that the RTO offers prospective learners recognition of prior learning (RPL). In previous standards it was not specified that an RTO must offer RPL which resulted in many RTO's simply adopting a policy not to do so. This clause now makes this mandatory. It should be noted that this clause is not about the sufficiency of your RPL tools and processes. These requirements are covered under clause 1.8; however, it is very common that an auditor when reviewing this clause during an audit will ask to see your RPL tools. RTO's should be ready for this and have well developed RPL tools. It is important to note that RPL is assessment. It is no different to any other form of assessment. The same rules of evidence and principles of assessment apply. RPL simply tends to focus on evidence from the candidate's past which may be presented in the form of documentary evidence and referees from the candidate's current or past work experience. Of course that is only relevant to clause 1.8 but, if the auditor requests to see your RPL tools and an example of a completed RPL assessment when they reach 1.12, don't say you were not warned. 😊 Note. Do not confused recognition of prior learning with credit transfer. It is a common mistake that RTO's make. RPL is an assessment process and credit transfer is an administrative process. Credit transfer is covered under clause 3.5.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Learner Handbook which is provided to the learner prior to their enrolment and informs them about the opportunity for recognition of prior learning. – An enrolment policy and procedure that clearly identifies where the prospective learner is provided Pre-enrolment information and informed about the opportunity for RPL. – Enrolment form where the learner may have indicated if they wish to seek RPL or credit transfer. – Your RPL tools for each training product on your scope of registration – maybe! – A sampled example of an RPL assessment you have completed – maybe! 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You offer recognition of prior learning to individual learners. <p>You might need to demonstrate that:</p> <ul style="list-style-type: none"> – You have available suitable RPL tools, resources and procedure to support the conduct of RPL. – You are undertaking RPL in accordance with training package requirements, the principles of assessment and the rules of evidence. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you show me where you offer RPL to learners during the enrolment process? – Do you have RPL tools for the training products on your scope of registration? – Can I see an example of a recently completed recognition of prior learning and assessment?

Audit Guide – Clause 1.13/1.14/1.16

1.13 The RTO's training and assessment is delivered only by persons who have:

- 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.

1.14 The RTO's training and assessment is delivered only by persons who have the training and assessment qualification (refer to schedule 1)

1.16 The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

What are these clauses about: These clauses are about making sure that the persons that you use to undertake training and assessment are competent in training and assessment and are competent in the unit of competency they are delivering training and assessment in. The requirement for training and assessment competency is specified within schedule one of the standards [Click Here](#). In a nut shell, this means that trainers and assessors need to hold the complete TAE40110 Certificate IV in Training and Assessment (no allowance for equivalence) or its successor ([TAE40116](#)) or a diploma or higher level qualification in adult education. For trainers delivering TAE qualifications and skill sets, additional requirements apply. Refer to schedule one of the standards.

The requirement for vocational competency is a little more complex and subjective. The clause says: "*vocational competencies at least to the level being delivered and assessed*". So they must hold the actual competencies or be able to demonstrate that they hold equivalent competency at least to the same level. They must also be able to provide evidence of their current industry skills (checkout the RTO standards glossary for "*Current Industry Skills*") and provide evidence that they are engaged in ongoing professional development in training and assessment.

So, it is not enough to simply be competent. The trainer must have evidence of their industry experience, current industry knowledge and skills and ongoing professional development. Our recommendation for "current" evidence is evidence of activity over the last 12-18 months. Hey! It is my document; I can recommend whatever I like. In my experience, currency and professional development evidence based on completed activities in the last 12 months will be considered more favorably by the auditor.

Just a little **note** to emphasise a point which is often overlooked: The trainer/assessor must be able to demonstrate that they have industry experience. This is specified within the definition of "Current Industry Skills". Industry experience is often demonstrated via a CV and referees.

Audit Guide – Clause 1.13/1.14/1.16	
<p>Evidence to prepare:</p> <p>Staff matrix that shows what trainers are nominated to deliver which items (competency) on the scope of registration. This might also list the training and assessment and vocational competence for each staff member along with a summary of their recent professional development.</p> <p>Professional development register that lists in detail the specific professional development the trainer has completed.</p> <p>Evidence that verifies participation in the professional development claimed in the professional development register.</p> <p>Professional development plan for each trainer that shows how the trainer will maintain their skills and knowledge in their vocational area of delivery and in training and assessment.</p> <p>Curriculum vitae or resume that showcases the experience the trainer brings in addition to the qualifications.</p> <p>Signed employment agreement or contract (Service Agreement for contractors) that confirms that the nominated trainer's engagement.</p> <p>Certified true copies of each trainer's qualifications that aligns with the staff matrix and substantiates their competency to undertake the training and assessment they are nominated to deliver.</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – Your trainers and assessors meet the minimum requirements for competency in training and assessment as specified in schedule one of the RTO standards. – Your trainers and assessors hold the vocational competencies at least to the level that they are delivering training and assessment in. – Your trainers and assessors can demonstrate their current industry skills and knowledge and ongoing professional development in training and assessment. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you provide me with the evidence of competency and currency for the following trainers please? – Can you talk me through how you validate a trainer's competence, experience and suitability during their recruitment / induction? – After reviewing these learner files, I have identified the following trainers that have undertaken assessment against these units. Can you provide me their staff files please? – How do you manage the allocation of trainers/assessor to specific items on your scope of registration? – What arrangements are you applying to ensure the ongoing professional development of training staff? – What arrangements are you applying to ensure the maintenance of current competence of training staff? – Do you have an employment agreement or service contract for this trainer? – Can you show me evidence of this trainer complying with licensing requirements?

Audit Guide – Clause 1.13/1.14/1.16	
<p>Any certifications required under licensing requirements such as working with children checks, police checks, high risk work licenses, etc</p> <p>Evidence that demonstrates their current competence. This may include recent RPL, professional development, work placement, professional membership, special projects, conferences or workshops, etc.</p> <p>A nicely formatted Staff File that includes all of this evidence and presents it in a professional and organised way.</p>	<ul style="list-style-type: none"> – I note that this trainer is coming into contact with learners who are under the age of 18 years. Do you have a current working with children check for this trainer? – This trainer does not have the required competence according to what they have been assessing. Do you have any additional evidence that would demonstrate their equivalent competence? – I am satisfied that this trainer has the required competency, but I note that they have only recently been awarded their vocational qualification. Do you have any evidence that demonstrates their industry experience?

Audit Guide – Clause 1.26/1.27

1.26 The RTO ensures that:

- a) learners enrolled in superseded training products which have been replaced are completed within a period of one year;
- b) learners enrolled in superseded training products which are not replaced are completed within a period of two years;
- c) learners enrolled in superseded skill set, unit of competency, accredited short course or module which are not replaced are completed within a period of one year;
- d) a new learner does not commence training and assessment in a training product that has been removed or deleted from the National Register.

1.27. The requirements specified in Clause 1.26 (a) do not apply where a training package requires the delivery of a superseded unit of competency.

What are these clauses about: These clauses provides the upper level framework to guide the actions the RTO takes when a training product on its scope of registration is superseded or removed from the National Training Register. The last bit of that sentence is fairly important because it is critical to understand that some training products are superseded and are replaced by a new training product and some are superseded but not replaced. What is a training product I hear you asking? The standards (within the glossary) define a training product as follows: *Training Product means AQF qualification, skill set, unit of competency, accredited short course and module.*

Ok, so here is where it gets confusing. If the training product is replaced you have one year to either finish off the learner or transition them to the new training product. If the training product is not replaced and is simply superseded (and is a qualification), then you have two years to finish off the learner in the superseded training product. However, if the training product is a skill set, unit of competency, accredited short course (and is superseded and not replaced) then you have twelve months to complete the learner. Clear as mud! Now 1.26d is very basic. You simply cannot commence a learner in a training product that has been removed or deleted from the National Training Register. Training products that have been replaced will remain on your scope of registration during the transition period and you are able to take new enrolments in the training product whilst it is on your scope of registration however this is not recommended. Sometimes it is necessary for a period of time but the RTO should try to get the new qualification on the scope as soon as possible and cease enrolments into superseded training product. With a twelve-month transition period ticking down you are only digging a hole for yourself and the learner by enrolling them into a superseded training products late in the transition.

Now, in respect of clause 1.27, this is a very misunderstood requirement. Essentially it means that if you have a qualification on your scope of registration and it is current but has units of competency in the qualification that are imported from other training packages, then you must continue to deliver imported units, even if they have been superseded in their home training package. It doesn't matter that it is superseded. It is current in the qualification and that is what you must deliver.

Please note: When considering these clauses, you must read the following ASQA general direction in conjunction with this guide: [General Direction—Learner transition](#)

Audit Guide – Clause 1.26/1.27	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Evidence of mapping the old and new training product to establish the equivalence and non-equivalence units. – Correspondence provided to learners informing them of how a transition will affect their enrolment and presenting them with options to complete their course. – Strategies to manage learners at risk of not completing their course within the transition period. – Subscription to information sources (TGA) to inform you of changes. – Learner records of learners affected by a superseded training product. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You are aware of training products on your scope of registration that have been superseded and are currently in transition. – You have considered the impact on the transition to learners who are currently enrolled and determined what affect the superseded training product has in terms of options for credit transfer or the necessity for gap training and assessment where the units of competency are not equivalent. – You have implemented the arrangements to add the new training product onto your scope of registration where this is required. – You have established a plan to cease enrolments in superseded training products and commence enrolments in new training products. – You have updated your marketing information to inform prospective learners of the training product currency.
<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you explain the arrangements being applied to manage the transition between training products that have been superseded? – Can you talk me through your arrangements to teach-out learners who are enrolled in superseded training products? – Have you determined the credit transfer arrangements between the two training products and how this will impact on currently enrolled learners? – Have you issued correspondence to currently enrolled learners informing them of the superseded training product and how this will impact them? – Have you identified any learners that you consider are at risk of not completing a training product within the transition period? – Can you provide me the following learner records who were transitioned over to the new qualification? 	

Audit Guide – Clause 2.1	
2.1 The RTO ensures it complies with these Standards at all times, including where services are being delivered on its behalf. This applies to all operations of an RTO within its scope of registration.	
What is this clause about: This clause simply requires your RTO to be compliant with all of the other clauses within the Standards for Registered Training Organisations (RTOs) 2015. So, if you are found non-compliant on any other clause or standard then 2.1 will also be non-compliant. Happy days!	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Training and Assessment Strategies – Clause 1.1 – Pathway for individual learning plan – Clause 1.2 – Availability of resources in support of services – Clause 1.3 – Training package alignment – Clause 1.4 – Industry engagement – Clause 1.5-1.6 – Learner support services – Clause 1.7 – Assessment arrangements – Clause 1.8 – Assessment validation arrangements – Clause 1.9-1.11 – Trainer assessor competency/currency – Clause 1.13-1.24 – Transition arrangements – Clause 1.26-1.27 – Quality improvement – Clause 2.2 – Third-party agreements and monitoring – Clause 2.3-2.4 – Issuing AQF certificates – Clause 3.1-3.4 – Credit transfer arrangements – Clause 3.5 – USI collection / verification / protection – Clause 3.6 – Marketing arrangements – Clause 4 – Pre-enrolment information arrangements – Clause 5 – Handling of complaints and appeals – Clause 6 – Governance and administration arrangements – Clause 7 – Cooperation with ASQA and legislative compliance – Clause 8 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – Your RTO is compliant with all Standards for Registered Training Organisations (RTOs) 2015. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Refer to all other clauses for questions in support of this clause.

Audit Guide – Clause 2.2	
<p>2.2. The RTO:</p> <p>a) systematically monitors the RTO’s training and assessment strategies and practices to ensure ongoing compliance with Standard 1; and</p> <p>b) systematically evaluates and uses the outcomes of the evaluations to continually improve the RTO’s training and assessment strategies and practices. Evaluation information includes but is not limited to quality/performance indicator data collected under Clause 7.5, validation outcomes, client, trainer and assessor feedback and complaints and appeals.</p>	
<p>What is this clause about: This clause requires the RTO to systematically collect and evaluate relevant information within its operation in order to monitor the quality and compliance of the training and assessment being delivered in accordance with standard 1. Sub-clause 2.2 (b) is very specific about information that is identified to be collected and analysed by the RTO. ASQA have included these specific items within its audit tool and the auditor will go through each one individually to check how the RTO is collecting the particular item of information and if opportunities for improvement have been identified and acted on as a result of analysis. So, this clause is simply about demonstrating that you are monitoring the quality and compliance of training and assessment and are continually improving it. Easy!</p>	
<p>Evidence to prepare:</p> <p>A documented continuous improvement (or quality improvement) policy that supports a “systematic approach” to continuous improvement such as the PDCA model. These models are quite useless unless they are integrated with the management systems of the organisation. I strongly recommend that your approach to continuous improvement is implemented as a component (agenda item) of your regular management meeting.</p> <p>Examples of specific data (information) that is being systematically collected and analysed as an input to the continuous approach such as:</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have a systematic approach to how you collect and analyse information in order to identify and act on opportunities for improvement. – You have made improvements based on the collection and analysis of learner and employer survey responses – You have made improvements based on your assessment validation activities and outcomes – You have made improvements based on the feedback you receive from your staff and learners – You have made improvements based on your handling and resolution of complaints and appeals <p>You should prepare for these types of questions:</p>

Audit Guide – Clause 2.2	
<ul style="list-style-type: none"> – Rate of completion – learner and employer satisfaction survey outcomes – assessment validation outcomes – feedback from trainers and assessors – Feedback from learners – outcomes from complaints and appeals handling <p>A continuous improvement register that demonstrates active use in the implementation and monitoring of improvement actions throughout the year is valuable.</p> <p>Specific examples of continuous improvement actions that were identified through analysis of information and have been implemented. Particularly focus on improvements that have resulted based on the collection and analysis of the above information.</p> <p>Documentary evidence of opportunities for improvement being implemented. So, if a complaint resulted in an adjustment to the completions process, for example, then showing a revised completions policy or checklist would be valid evidence of continuous improvement.</p>	<ul style="list-style-type: none"> – Can you talk me through your arrangements to apply a continuous improvement approach to your operation? – What data are you collecting and analysing to identify opportunities for improvement? – How are you recording your continuous improvement actions so they can be monitored during their implementation? – Do you have documented policy, procedure or forms that support your implementation of your continuous improvement arrangements? – How do you make decisions about improvements? Is it conducted as part of your management meeting or do you have a separate forum that gets together specifically to look at continuous improvement? Do you involve other staff in decision making? – Can you show me examples of improvements to training and assessment? – Have any improvements resulted from your collection and review of learner survey responses? – Are you able to identify any improvements that have resulted from your assessment validation activities? – How do you collect feedback from your trainers and assessors? Is this resulted in any improvement opportunities? – Have you needed to respond to any complaints in the past 12 months? Has this resulted in any opportunities for improvement?

Audit Guide – Clauses 2.3 and 2.4	
<p>2.3 The RTO ensures that where services are provided on its behalf by a third-party the provision of those services is the subject of a written agreement.</p> <p>2.4 The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and uses these to ensure that the services delivered comply with these Standards at all times.</p>	
<p>What are these clauses about: These clauses are simply about the requirement to have in place a written agreement with third parties and sufficient strategies to monitor the services being delivered on the RTO’s behalf. What is third-party? A third-party that is applicable under this clause is any organisation that is delivering services on behalf of an RTO using the RTO’s scope of registration. These services can include training and assessment services, education support services and activities relating to the recruitment of prospective learners. Note, that the use of contract trainers is not considered by the regulator to be a third-party arrangement. To understand the third-party arrangements, I strongly recommend that you read the “Third-party arrangements” fact sheet from ASQA (click).</p> <p>Ok, what is a written agreement? Well the above fact sheet explains this. Just be aware that there are some mandatory inclusions required by ASQA in third-party agreements. These are specified in standard 8, so refer to that section for details. The point to stress here is the need to ensure there is a current and valid written agreement and that it includes the details of the monitoring arrangements you have established to ensure that the third-party delivers services in accordance with your obligations specified within the RTO standards. Depending on the services being provided and the complexity of the third-party arrangement, monitoring arrangements can take many forms. Some examples of monitoring arrangements include mandating the use of learning and assessment materials, conducting site visits, restricting the third-party’s operation to approved sites and trainers only, restrictions on advertising, internal audits, etc. The more complex the third-party arrangement and the higher risk presented by the arrangement should result in more robust monitoring of the third-party’s activities.</p> <p>If you have a written agreement that specifies the monitoring arrangements then you should be compliant with clause 2.3; however, if you have not implemented those monitoring arrangements or cannot provide evidence of the arrangements being implemented then you will be non-compliant with clause 2.4.</p>	
<p>Evidence to prepare:</p> <p>Partnership or third-party agreements for each third-party currently engaged.</p> <p>Details of the monitoring arrangements for each third-party.</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have a written and signed agreement for all third-party arrangements that you are engaged in.

Audit Guide – Clauses 2.3 and 2.4	
<p>Evidence of monitoring arrangements being applied including monitoring of marketing activities, training and assessment quality, trainer assessor competency currency, etc. It is recommended that this evidence be documentary. For example:</p> <ul style="list-style-type: none"> – if you have specified a monitoring arrangements for the third-party only to use trainers to you have approved, then it would be reasonable for you to have a list of those trainers and evidence of their competency and currency. – if your monitoring arrangement includes the requirement for site visits to the third-party sites, then it would be reasonable for you to produce site visit reports or evidence that these site visits have been undertaking. – If your monitoring arrangement includes the conduct of monthly management meetings with third-parties, then it would be reasonable for you to have a record or minutes of these meetings. <p>Learner records that pertain to the services being delivered by third-parties.</p> <p>Records of outcomes issued such as qualifications and statements of attainment pertaining to services being delivered by third-parties.</p>	<ul style="list-style-type: none"> – You have appreciated the risk and complexity of each third-party arrangement and have established suitable monitoring arrangements within the agreement and can demonstrate that you have implemented these. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Are you engaged in any third-party arrangements where others are delivering services on your behalf as an RTO? – Can you provide me the written agreement for these third-party arrangements please? – Have you notified ASQA of these third-party arrangements? Can I see the email receipt for these notifications please? – What monitoring arrangements are you applying to ensure the quality of training and assessment? – Can I see evidence of these monitoring arrangements being applied? – Can I have a list of all the qualifications or units of competence that have been issued under the third-party arrangement along with the details of the applicable learners? – Can I please see the following learner files relating to the third-party arrangement? – How do you monitor the advertising that the partner undertakes on behalf of you all registration? – How did you determine the sufficiency of the monitoring arrangements for this third-party agreement?

Audit Guide – Clause 3.1	
3.1 The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.	
<p>What is this clauses about: This clause is about ensuring that you have suitable controls or mechanisms to ensure that assessments which are not conducted properly or are insufficiently recorded, not signed, etc are captured before they are entered into the student management system and relied on for the issuance of any nationally recognised outcomes. Every record of assessment that the RTO receives should be channeled through administration area where it is reviewed for its completeness and detail. If the record is not accurate or sufficiently detailed, it should be returned to the assessor for additional work before it is accepted. I frequently remind clients that if these records get through administration and into the learner file, the next person to see that record will be an auditor. <u>Do not</u> allow trainers to input assessment results into the student management system.</p> <p>As a consequence of the requirements of this clause, the accuracy of your assessment records also becomes relevant. It is critical that your assessment evidence is sufficiently detailed and accurate and the information such as the assessment date entered into the student management system corresponds with the hard copy record. Do not allow your student management system to default to the date the result was entered. Your administrative staff should correct this and ensure that the date entered is the date of assessment that appears on the hard copy record.</p>	
<p>Evidence to prepare:</p> <p>Evidence of how the organisation ensures that its AQF certificates are only issued to persons who have been validly assessed as competent. This may include:</p> <ul style="list-style-type: none"> – Evidence that assessment decisions are recorded properly and signed for by a qualified trainer assessor – Evidence of a quality review of assessment records as they are received to ensure they have been properly completed with the correct learner details, course details, sufficient assessment evidence and are signed 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You haven't suitable controls to ensure that only valid assessments which are properly recorded are accepted by the organisation before they are entered into a student management system – The details recorded within your student management system are in alignment with the retained student assessment items which verify assessment decisions. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – What arrangements do you apply to prevent assessments which are not properly completed from being accepted for the issuance of a unit of competency? – Can you provide me the following student records please and can we get access to these student's outcomes in your student management system?

Audit Guide – Clause 3.1	
<ul style="list-style-type: none">– Evidence that outcomes are correctly entered into a student management system with the relevant details including the date of the assessment decision	<ul style="list-style-type: none">– For this student, I need to see the assessment decision record relating to the 3 assessment tasks identified within your assessment plan and the record of where the student was signed off as competent. I would like to now check this assessment date within the student management system.

Audit Guide – Clause 3.2	
3.2 All AQF certification documentation issued by an RTO meets the requirements of Schedule 5.	
<p>What is this clause about: This clause is about ensuring that the format of your qualification certificates, statement of attainment certificates and record of results comply with the requirements of schedule 5 of the RTO standards and the requirement specified within the Australian Qualifications Framework. The trouble with these documents is that they are vague and extremely open to interpretation. In our experience the RTO's well advised to strictly follow the example provided by ASQA in the following document: Fact sheet—Sample AQF documentation. You are also recommended to review the frequently asked questions section relating to Testamurs and Statements of Attainment: AQF Frequently Asked Questions and the AQF Qualifications Issuance Policy.</p> <p>These documents combined, layout the rules and format for issuing AQF certificates. The Sample AQF documents includes little details such as on the qualification it says, "This is to certify that" as opposed to the statement of attainment which says "this is a statement that". Now, these are not mandatory words within schedule 5 or the AQF; however, we have experienced auditors making RTO's non-compliant for these types of things where the RTO's certificate is not in accordance with the fact sheet supplied by ASQA. Take-home point: Ensure your certificates align with the ASQA fact sheet.</p> <p>The AQF also makes it mandatory for the RTO to implement measures that would prevent the fraudulent production of their certificates. There are many ways of doing this and this also is a major area of auditor subjectivity. We try and encourage clients to issue their certificates in hard copy format and where possible physically sign each certificate. Documents which are digitally signed and issued electronically are highly prone to fraudulent reproduction. Examples of measures to prevent fraudulent production include, unique certificate number, unique student number, physical signature, unique water mark, document embossing, digital encryption, et cetera.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Sample Statement of Attainment issued within the last 6 months – Sample Qualification with a Record of Results issued within the last 6 months – Access to learner records relating to AQF outcomes issued. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – Your qualification format (including the record of results) complies with the requirements of the AQF and schedule 5 of the RTO standards – Your statement of attainment format complies with the requirements of the AQF and schedule 5 of the RTO standards – You apply mechanisms to prevent the fraudulent production of your certificates. – You do not include the learner's Unique Student Identifier on any AQF certificate

Audit Guide – Clause 3.2	
<ul style="list-style-type: none"> – Access to the student management system to verify outcomes appearing on sampled AQF certificates. – Can verify that the Unique Student Identifier is not included on any statement of attainment, qualification or record of results. 	<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you provide me a copy of the statement of attainment issued to the following learner please? – Can you provide me a copy of the qualification certificate issued to the following learner please? – Can you talk me through how the certificate is raised and authorised? – What mechanisms have you implemented to prevent the fraudulent production of your certificates?

Audit Guide – Clause 3.3	
3.3 AQF certification documentation is issued to a learner within 30 calendar days of the learner being assessed as meeting the requirements of the training product if the training program in which the learner is enrolled is complete, and providing all agreed fees the learner owes to the RTO have been paid.	
<p>What is this clauses about: This clause is about ensuring that your AQF certificates are issued within 30 days from the date the student is assessed as competent in their final unit of competency. This clause is quite easily audited. The auditor would have usually sampled a range of learner records during their audit of 1.8. They will utilise these records and may select others to simply check the date of the learner’s final assessment of competency against the date the learner was issued there AQF certificate. Keep in mind that there are 2 reasons why an RTO is not obliged to meet this requirement. The first is that the learner has not paid the RTO the fees for the course. The second reason is that the RTO has not been provided or able to verify the learner’s Unique Student Identifier. It is a civil offence for the RTO to issue an AQF certificate without first verifying the learner’s Unique Student Identifier. Most auditors will want to see some policy, procedure or workflow that demonstrates how the organisation meets this requirement. This procedure might put specific timeframes around milestones required to be met before the certificate can be issued. An example of this is requiring assessment records to be returned to the office within a minimum timeframe or results being entered into the student management system again within a minimum timeframe. Ultimately the most valid form of evidence in relation to this clause is the outcome of issuing AQF certificates within the 30 calendar days.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Learner records where evidence of assessment decisions and the date they were made are available. – Sample AQF certificates where the date issued can be compared with the last date the learner was assessed as competent in the enrolled course – Policy and procedure that describes the process to generate and issue AQF certificates within 30 days from the date the learner was assessed as competent. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You issue all AQF certificates within 30 calendar days from the date the student is assessed as competent in their final unit of competency. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through your process to award certificates within 30 calendar days? – Can you provide me the details of the qualification issued to the following learners please? – Can you provide the learner records for the following learners please? – Can we access these learner’s records within the student management system and compare the date of their final assessment with the certificate issuance date?

Audit Guide – Clause 3.4	
3.4 Records of learner AQF certification documentation are maintained by the RTO in accordance with the requirements of Schedule 5 and are accessible to current and past learners.	
<p>What is this clause about: This clause is about ensuring that as an RTO you can provide current learners with access to their AQF records which includes details of their current progression in the course they are enrolled. It also requires that past learner can request and receive a re-issued or replacement certificate based on the course which they have completed. Schedule 5 of the RTO standards also requires that the RTO maintain a register of all qualifications and statements of attainment issued. In reality, this register is the RTO’s student management system which should be capable of producing a report over any given timeframe of statements of attainment and qualifications it has issued. Some auditors tend to apply their personal preferences about what shape and form this “register” should take. There is no definition or specification in the RTO standards or the AQF so this requirement is quite subjective. I recommend that it be detailed and able to be printed in a hard copy format. The critical information is the learner’s details, the qualification or units of competency they achieved and the date of achievement.</p> <p>A good question to ask in considering this clause is how you would issue a learner who is currently enrolled with a report on the outcomes they have achieved and they are enrolled in. RTO’s have many and varied answers to this question and in their arrangements to report this information. There is technically no guidance to specify how this should occur. The best advice that I can provide and what has been a successful approach for over a decade is to issue the currently enrolled learner with a record of results. The record of results is recognised within the AQF but when issued independently from the qualification it is not an official AQF certificate but is more an administrative record that reports the current stage of the learner’s progression. Most student management systems have the capability to produce a record of results for are currently enrolled learner.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Access to learner records relating to AQF outcomes issued. – Access to the student management system to verify outcomes appearing on sampled AQF certificates. – A register of all statements of attainments issued 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You maintain a register of all statements of attainment and qualifications issued – You retain records of AQF outcomes issued for a period of 30 years. – You can issue current learners with a record of their results or transcript – You can issue past learners with a replacement AQF certificate – you manage AQF records with integrity and accuracy

Audit Guide – Clause 3.4	
<ul style="list-style-type: none"> – A register of AQF qualifications issued – Can verify that all AQF outcome records are retained for a period of 30 years. The auditor may choose to request records of outcomes the RTO issued in the first year of the registration to verify this. – Evidence of the arrangements to issue a past or current learner with a replacement certificate or a record of results detailing the learner’s current progression. 	<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you show me in your student management system how you can produce a register of all statements of attainment and qualification is issued? – I see that you were initially registered in 2003. Are you able to access the data of your issued AQF outcomes from this period? – Do you have any policy and procedure around record management relating to the retention of your AQF records for 30 years? – Are you able to provide me an example of how you have reissued an AQF certificate to a past learner? – If a learner’s employer requested that the learner obtain a record from the RTO that details their current stage of progression, how would you report this?

Audit Guide – Clause 3.5	
3.5 The RTO accepts and provides credit to learners for units of competency and/or modules (unless licensing or regulatory requirements prevent this) where these are evidenced by: a) AQF certification documentation issued by any other RTO or AQF authorised issuing organisation; or b) authenticated VET transcripts issued by the Registrar.	
<p>What is this clause about: This clause is about the recognition of outcomes issued by other RTOs. Our National Skills Framework is relatively unique in the world. Over the last 20 years, we have been building this wonderful framework of nationally recognised qualifications, accredited courses, skill sets and units of competency. We have a system to approve providers the ability to train, assess and award these nationally recognised outcomes. A cornerstone of our system is the concept of mutual recognition. A learner can be issued a unit of competency in Darwin and that outcome is as equally valuable in Adelaide. This is because for RTO's have a statutory obligation to recognise the outcomes issued by other RTO's. Colloquially, this is referred to as credit transfer. It is common to also hear people refer to this as "national recognition".</p> <p>The common misunderstanding with credit transfer is that it is somehow linked with recognition of prior learning. RPL is assessment and has nothing to do with the process of credit transfer. Credit transfer is administrative process where a learner seeks credit for units of competency they have previously achieved and the RTO determines if these units of competency are equivalent to the units of competency they are offering in the course. If the units are equivalent then the relevant units of competency are issued as a credit transfer. The RTO will retain the evidence that it relied on to issue a credit transfer outcome. This will typically be an AQF certificate and should always be certified as a true copy. It is quite critical that the RTO can produce this evidence at a regulatory audit when requested to do so.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Policy or procedure applied by the organisation to handle credit transfer applications – Information provided to learners (Learner Handbook) that informs them of the opportunity to apply for credit transfer and the requirements for this. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You inform learners of their opportunity to seek credit transfer for units of competency previously achieved – You recognise the outcomes issued by other RTO's and do not discourage students from seeking a credit transfer – You retain evidence that was relied on to issue a credit transfer

Audit Guide – Clause 3.5	
<ul style="list-style-type: none">– An example of a unit of competency being awarded as a credit transfer and the retained evidence that was relied on to demonstrate existing competency.– An example of a unit of competency being awarded as a credit transfer where the unit codes and titles were different and equivalency was established through confirmation on the national training register.– Credit transfer application forms that systemise the application process and enable quality checks to be conducted prior to issuance being awarded.	<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none">– Can you provide a recent example of where you have issued a credit transfer to a learner?– Can you talk me through the process for handling these applications?– Can you talk me through how you determine equivalency when the units of competency code and title are not the same?– How do you inform learners of the opportunity to seek credit transfer for units of competency previously achieved?

Audit Guide – Clause 3.6	
<p>3.6. The RTO meets the requirements of the Student Identifier scheme, including:</p> <ul style="list-style-type: none"> a) verifying with the Registrar, a Student Identifier provided to it by an individual before using that Student Identifier for any purpose; b) ensuring that it will not issue AQF certification documentation to an individual without being in receipt of a verified Student Identifier for that individual, unless an exemption applies under the Student Identifiers Act 2014; c) ensuring that where an exemption described in Clause 3.6 (b) applies, it will inform the student prior to either the completion of the enrolment or commencement of training and assessment, whichever occurs first, that the results of the training will not be accessible through the Commonwealth and will not appear on any authenticated VET transcript prepared by the Registrar; and d) ensuring the security of Student Identifiers and all related documentation under its control, including information stored in its student management systems. 	
<p>What is this clause about: This clause requires the RTO to comply with the requirements of the <i>Student Identifiers Act 2014</i>. Introduced in January 2015, this legislation requires that all learners awarded a nationally recognised outcome must hold a valid Unique Student Identifier. To understand the USI requirements, visit the following site and read everything: https://www.usi.gov.au/training-organisations. Most student management systems have an inbuilt capability to verify and create a learner's USI. The learner and the RTO can also undertake these functions on the USI system if they are registered to do so. The key things that will be subject to review during a regulatory audit are: That you inform learners about their USI obligation (including exemptions) prior to their enrolment, that you apply a process to collect and verify a learner's USI, that no AQF certificates are issued without verifying the learner's USI and that you apply suitable security arrangements to protect access to a learner's USI information.</p> <p>A little-known fact is that the USI under the <i>Student Identifiers Act 2014</i> is categorised as <u>sensitive information</u> as defined in the <i>Australian Privacy Principles</i>. The USI is classed as biometric information that is to be used for certain purposes. The RTO has a legal obligation to ensure that the learner's USI is never distributed to unauthorised persons and its access within the RTO is closely restricted only to those who are authorised and have a need to access the information. Read more about the learner's Privacy and the Unique Student Identifier at the following link (click).</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Evidence of pre-enrolment information provided to the learner that informs them about their rights and obligations regarding the USI 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You provide information to prospective learners (prior to enrolment) about their obligation to hold a USI and of relevant exemptions that may apply

Audit Guide – Clause 3.6	
<ul style="list-style-type: none"> – Evidence of how the organisation collects a USI from a learner – Evidence of how the organisation creates or verifies a USI on behalf of the learner during the enrolment process – Evidence of how USI details and document verification evidence is being stored to protect the privacy of the learner – Evidence that demonstrates that the USI is not included in any AQF certificates – Access to student management system to verify that no AQF certificates have been issued without holding a valid USI 	<ul style="list-style-type: none"> – You provide information to prospective learners (prior to enrolment) on how the learner can access an authenticated VET transcript from USI system that details their achievements (click) – You have a process to verified the USI either on the USI system or within your student management system before it is relied on to issue AQF certificates – You have appropriate security arrangements to protect the privacy of learners and prevent unauthorised access to the learner’s USI details <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through the process for informing learners about their obligation to supply a valid USI? Can you show me where this information is provided prior to enrolment? – What mechanism do you use to verified a learner’s USI? Can you show me how this works and where you keep details of the verification? – How do you protect access to the learner’s USI? Who else has access to this system? – Have you awarded any AQF certificates since January 2015 without holding a valid USI of the learner? Can we access learner records in your student management system in March/April 2015 to verify this?

Audit Guide – Clause 4.1

4.1. Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third-party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third-party;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
 - i) a learner will successfully complete a training product on its scope of registration; or
 - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
 - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

What is this clause about: This clause requires the RTO to provide clear, current and accurate information about your training organisation and the training and assessment services you provide. This clause is all about ensuring that your prospective learners or third-parties are well-informed about the services you provide prior to their enrolment or commencement, whichever comes first. This relates to all marketing information including that which is printed, provided by your website, provided via third-party's website, provided via social media, direct marketing or online directories. The clause is quite clearly stated and is one of the less subjective clauses within the standards. Where RTO's get in trouble with this is because they try to be tricky or try to push the envelope in attempting to get some market

Audit Guide – Clause 4.1

advantage in their advertising and marketing. It blows me away when I am doing an audit and the RTO does not include the training product code and title on their website or fails to include the RTO code on marketing information. It specifies these requirements in black-and-white in the clearest of terms within this clause. There is no logical excuse why an RTO does not comply with this requirement other than ignorance and/or apathy. ASQA has provided an excellent fact sheet that provides additional guidance to RTO’s about the requirements relating to marketing and advertising ([click](#)).

Note. A benchmark for the auditor during the review of marketing information is the organisation’s training and assessment strategy. The first criteria the auditor reviews are to determine if the information is accurate and represents the services provided by the RTO. The points of comparison for the marketing information are the training and assessment strategy which should describe how training products are being delivered, the learner records including training plans and learning and assessment materials. These items (but predominantly the training and assessment strategy) are the actual evidence of how the services are being delivered. When the auditor reviews the accuracy of the marketing, these documents are the benchmark to compare if the information accurately represents the services provided.

Take-home point: Make sure that these documents and marketing are in alignment.

Evidence to prepare:

- Copy of current course brochures, newspaper advertising, etc
- Access to the organisations current website, social media campaigns, online directories, etc
- Access to third-party websites (or other marketing information) who are advertising training and assessment services on behalf of the RTO
- It should be noted that all marketing material must include all items identified at clause 4.1 subparagraphs a – l, where they are applicable to the RTO.

You must be able to demonstrate that:

- Your marketing information accurately reflects the services you are providing and this can be confirmed through access to learner records and training and assessment strategies.
- Your marketing information includes your RTO code and the approved code and title of all training products as they appear on the national training register ([training.gov.au](#)).
- If you refer to any other person or organisation in your marketing then you have evidence of a written consent to do so.
- You use the NRT Logo in marketing in accordance with its conditions of use ([click](#)).
- You distinguish clearly between non-accredited training services and nationally recognised training services (keep them very separate).
- You disclose the details of third-parties where they are delivering on your behalf or you are delivering on their behalf.

Audit Guide – Clause 4.1	
<p>Note. Prior to an audit, conduct a critical review of all marketing information to ensure that the items specified within clause 4.1 are being complied with. This review should include marketing information of third-parties.</p>	<ul style="list-style-type: none"> – You provide detailed information to learners about relevant licensing or regulatory requirements applicable to the course being offered. – You provide detailed information to learners about relevant government funding or subsidy programs applicable to the courses being offered. – You do not guarantee any specific outcome such as employment, course completion, etc. Don't make claims that are outside of your control. Be ethical.
<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Are you engaged in any third-party arrangements? – Which courses on your scope of registration are offered via refunding or government subsidy arrangement? – What media/format do you utilise to conduct advertising and marketing? Can you provide me an example of these for following courses please? – What is your process for developing and approving marketing material before it is used? – Can you show me in this marketing where the RTO code is included? – We need to confirm that the course model described in this marketing accurately reflects the services being provided. Are we able to access the training and assessment strategy for this course? – Can you show me the disclosure of your third parties that the courses being offered are using your scope of registration? – You are making a reference here to this industry peak body, can you provide me evidence that you have obtained their consent to do this? – Do you utilise any checklist or quality control document to ensure the compliance of marketing before it is relied on? 	

Audit Guide – Clause 5.1	
5.1. Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner’s needs, taking into account the individual’s existing skills and competencies.	
<p>What is this clause about: This clause is about consumer protection. You are a service provider and the learner is a consumer. When you consider this clause, you need to do so in conjunction with the requirements of Australian Consumer Law. I absolutely recommend that all RTO chief executives and managers become familiar with the information contained at the Australian Consumer Law website (click).</p> <p>This clause requires that the RTO take active steps to engage with the prospective learner to inform them very clearly about the services being provided and to ensure that the RTO has determined the learner’s needs and directed them to a course that is suitable to meet their needs. RTO’s should think of this requirement as a mini training needs analysis of the learner. The RTO should have specified enrolment procedures that detail the process to channel prospective learners through an engagement process and information pathway to ensure their needs are identified and they are provided with detailed and accurate information to inform their decisions about enrolment. It may be the case that once the RTO has determined the learner’s needs, the RTO may conclude that they do not have the services to meet the specific learner requirements. In this case, it is a valid outcome to refer the prospective learner to another RTO. RTO's should not enroll a learner into a course for their own benefit where it is not consistent with the learners training needs. I know that’s an obvious statement, but you would be amazed!</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Details of the RTO’s enrolment procedure including policy or forms used to quality assure the process. – Access to the learner records where learner engagement may be verified and training needs are recorded. – Evidence of the arrangements to engage with learners prior to their enrolment and to provide accurate and detailed information about the services being offered. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You engage with learners prior to their enrolment to determine their training needs and provide them accurate and detailed information about the services being offered. – You take into account the learner’s existing skills and competency and have arrangements to determine the amount of training for each learner and apply recognition processes where applicable. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through your process to engage with learners prior to their enrolment and to determine their training needs? – Can you talk me through how you take into account the learner’s existing skills and competency? – Can we access learner records to verify this process being applied?

Audit Guide – Clause 5.2

5.2. Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;**
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:**
 - i) estimated duration;**
 - ii) expected locations at which it will be provided;**
 - iii) expected modes of delivery;**
 - iv) name and contact details of any third-party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and**
 - v) any work placement arrangements.**
- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.**
- d) the learner's rights, including:**
 - i) details of the RTO's complaints and appeals process required by Standard 6; and**
 - ii) if the RTO, or a third-party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;**
- e) the learner's obligations:**
 - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;**
 - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and**
 - iii) any materials and equipment that the learner must provide; and**
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.**

Audit Guide – Clause 5.2

What is this clause about: Following on from clause 5.1, this clause specifies the minimum information requirements that must be provided to prospective learner prior to their enrolment or commencement to inform them about the services being provided. This clause equally relates to consumer protection and focuses on ensuring that learners are provided with sufficient and accurate information to inform their consumer decisions.

There is a close relationship between the requirements in this clause and the requirements relating to marketing specified in clause 4.1. Marketing information will constitute the primary content that informs this clause. Noting this, there are other important information sources that will also be applicable. These include fee information, learner or participant handbooks, et cetera. Some of the requirements within this clause may not be applicable to many RTO's such as those relating to the VET FEE-HELP or VET Student Loan scheme.

Evidence to prepare:

- Enrollment process that confirms learners are provided information about rights and obligations prior to their enrollment.
- Learner handbook or other information source that informs learners of their rights and obligations. This may include course brochures or other marketing information.
- Mechanism for obtaining a formal acknowledgement from the learner that they have been informed about their rights and obligations. This may be part of the learner's signed service agreement with the RTO where they agree to the RTO's terms and conditions.
- Student information about government subsidy eligibility, obligations and entitlements

You must be able to demonstrate that:

- You provide the prospective learner prior to their enrolment or commencement with detailed information about the services being provided. This information may be provided in print, electronically or through referral to other information sources.
- You accurately describe the services being provided including the training product code and title, estimated course duration, location of delivery, the mode of delivery, work placement requirements and a broad outline of the course structure.
- You disclose any details of third parties including where services are provided on the RTO's behalf and where you are delivering services on behalf of another RTO.
- You provide a declaration that identifies who (which RTO) is responsible for the quality of the training and assessment services being provided and for the issuance of any AQF certificates.
- You provide information that informs the learner about their rights and obligations including complaints and appeals processes, the materials and equipment the learner must provide, requirements to successfully complete their chosen training, obligations under any relevant government subsidy and the learner's rights if the services are not delivered.

Audit Guide – Clause 5.2

You should prepare for these types of questions:

- Can you explain the process for enrollment and how learners are informed about their rights and obligations?
- What documents do you use to communicate this information?
- What do you define as the learners' rights and obligations?
- How do you confirm that the learner understands their rights and obligations?
- How do you ensure staff are informed about the learner's rights and obligations?
- Can I see the information source (Learner Handbook) where all this information is contained?
- Can I see some learner files where learners have signed to acknowledge their rights and obligations?
- How do you inform the learner about the course duration and mode of delivery?
- Can you show me where the learner is informed about who (which RTO) is ultimately responsible for the quality of training and assessment services and for the issuance of the AQF certificate on their course completion?
- This course is delivered using a government subsidy. These subsidies have eligibility criteria and include implications for the learner in relation to gaining access to the subsidy. How is this information communicated to the learner prior to their enrolment or commencement?

Audit Guide – Clause 5.3

5.3. Where the RTO collects fees from the individual learner, either directly or through a third-party, the RTO provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying:

a) all relevant fee information including:

- i) fees that must be paid to the RTO; and
- ii) payment terms and conditions including deposits and refunds;

b) the learner's rights as a consumer, including but not limited to any statutory cooling-off period, if one applies;

c) the learner's right to obtain a refund for services not provided by the RTO in the event the:

- i) arrangement is terminated early; or
- ii) the RTO fails to provide the agreed services.

What is this clause about: This clause specifies the minimum information requirements that must be provided to prospective learner prior to their enrolment or commencement to inform them about the RTO's collection of fees from the individual learner. This includes the total amount of fees to be paid and the schedule of payments, the payment terms and conditions including deposits and refunds.

Just a **quick note** on the requirement relating to a statutory cooling off period specified at clause 5.3b. This clause specifies the requirement that the RTO inform prospective learners about their consumer rights. Consumer Law in Australia has generally been harmonised across all states and territories. There are some useful information sources available at the following website to inform learners about their consumer rights ([click](#)). Apart from specifying this, the clause also makes a special mention of any statutory cooling off period, if one applies. What is a statutory cooling off period and what are the circumstances when one applies? Great question! The ACCC identify that, "A cooling-off period is a safeguard designed to give consumers the opportunity to change their minds about a purchase or agreement they have made. You have a right to a cooling-off period when you purchase goods or services through telemarketing or door-to-door sales ([click](#)). Where a service agreement is obtained through telemarketing or door-to-door sales ([click](#)) this is referred to as an 'unsolicited consumer agreement'. It is under these types of agreements that a statutory cooling off period applies. If your RTO does not undertake marketing using these types of sales tactics, then the statutory cooling off period disclosure requirement will not be applicable to you.

Audit Guide – Clause 5.3	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Learner or participant handbook which includes information about fees, payments and refunds. – Fee schedule documents that include information about the total fees and the required schedule of payments to be made. – Policy and procedure relating to fee payments, refunds, early termination, transfers or fee credits. – Learner service agreements which include terms and conditions. – Policy relating to the learner’s rights if the RTO terminates the services early or is unable to deliver the service. – Access to learner payment records. – Access to administrative forms such as those required to request a refund – Access to learner records to verify agreed terms and conditions. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You provide information that informs the learner about their obligation to make fees and payments including the total amount of fees to be paid and the schedule of payments, the payment terms and conditions including deposits and refunds, the learner’s consumer rights and the learner’s rights to obtain a refund where the services are terminated early or the RTO fails to provide the agreed services. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through how the learner is provided information about the applicable fees, payments and refunds? – How do you inform learners about their rights as a consumer? – What is the process for the learner to request a refund? – Can you talk me through your marketing arrangements? Do you undertake any telemarketing or door-to-door sales? If so, how do you inform learners of their right to a statutory cooling off period? – Do you have a service agreement that learners are required to sign as part of their enrolment? Can you provide me a copy of this for the following learners please? – Can you recall a situation where a learner has been provided a refund? Is it possible to access the learner’s file and the payment records for this learner?

Audit Guide – Clause 5.4	
5.4. Where there are any changes to agreed services, the RTO advises the learner as soon as practicable, including in relation to any new third-party arrangements or a change in ownership or changes to existing third-party arrangements.	
<p>What is this clause about: This clause requires the RTO to establish arrangements to ensure that where the RTO chooses to make changes to agreed services or the learner’s terms and conditions, that the RTO advises the learner as soon as practicable of the applicable changes. This also includes where third parties make changes to their services or terms and conditions. It would be a breach of the consumer’s rights to change the terms and conditions or the services specified in their service agreement without providing them proper notification of this. This is a simple requirement that requires a basic arrangement to provide learners with a notification period prior to any changes taking effect. I would typically recommend that an RTO align this notification period with their appeals period. As an example, the RTO provides learners 30 calendar days to appeal decisions that it has made. The RTO also commits to providing learners with a minimum of 30 days notification of any changes in services or terms and conditions prior to their taking effect. This enables the learner to appeal any changes to terms and conditions or services prior to these changes taking effect and impacting unfairly on the learner. Auditors can also focus on the method of notification. Whilst the student handbook and the RTO policy may reinforce these arrangements, how does the RTO provide the notification?</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Access to the learner or participant handbook and the learners agreed terms and conditions. – Policy and procedure relating to changes to agreed services and terms and conditions. – Learner service agreements which include terms and conditions. – Access to administrative forms such as those used to inform learners about changes to services or agreed terms and conditions and obtained their acknowledgement. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You advise learners of any changes to agreed services or terms and conditions. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you show me where you inform the learner about their right to be informed about any changes to the agreed services or terms and conditions? – How do you provide these notifications? Do you obtain an acknowledgement? – Do you have an example of a notification issued where there has been a change to the services or terms and conditions?

Audit Guide – Clause 6.1-6.6

6.1. The RTO has a complaints policy to manage and respond to allegations involving the conduct of:

- a) the RTO, its trainers, assessors or other staff;
- b) a third-party providing services on the RTO's behalf, its trainers, assessors or other staff; or
- c) a learner of the RTO.

6.2. The RTO has an appeals policy to manage requests for a review of decisions, including assessment decisions, made by the RTO or a third-party providing services on the RTO's behalf.

6.3. The RTO's complaints policy and appeals policy:

- a) ensure the principles of natural justice and procedural fairness are adopted at every stage of the complaint and appeal process;
- b) are publicly available;
- c) set out the procedure for making a complaint or requesting an appeal;
- d) ensure complaints and requests for an appeal are acknowledged in writing and finalised as soon as practicable; and
- e) provide for review by an appropriate party independent of the RTO and the complainant or appellant, at the request of the individual making the complaint or appeal, if the processes fail to resolve the complaint or appeal.

6.4. Where the RTO considers more than 60 calendar days are required to process and finalise the complaint or appeal, the RTO:

- a) informs the complainant or appellant in writing, including reasons why more than 60 calendar days are required; and
- b) regularly updates the complainant or appellant on the progress of the matter.

6.5. The RTO:

- a) securely maintains records of all complaints and appeals and their outcomes; and
- b) identifies potential causes of complaints and appeals and takes appropriate corrective action to eliminate or mitigate the likelihood of reoccurrence.

What is this clause about: This clause requires the RTO to establish and apply a complaints policy and procedure and an appeals policy and procedure. These do not need to be separated and can be combined into the one complaints and appeals policy and procedure. It is important to note the difference between a complaint and an appeal. A complaint is merely an expression of dissatisfaction with something or someone in connection to the RTO. An appeal is where the person is seeking the RTO to review a decision that it has made. This is normally where the decision has an adverse impact on the person such as where an RTO declines an application for refund from a learner who failed to attend the course. Most appeals are administrative related and contrary to popular belief appeals of assessment decisions are reasonably rare.

Audit Guide – Clause 6.1-6.6

Another important aspect of these clauses is the requirement for the policies to be broadly applicable to anyone. So, this is not purely a learner centric requirement. If an employer seeks to make a complaint about the RTO, if a staff member wishes to make a complaint about a learner or the learner wishes to make a complaint about the RTO, it is applicable in all of these situations. This is why the policy needs to be publicly available and not simply contained within the learner handbook. The complaints and appeals policy needs to adopt the principles of natural justice and procedural fairness particularly relating to where allegations may be made by one person about another. This includes the requirement to hear both sides of the matter and allow for unbiased and fair representation. Most states and territories ombudsman have guidelines on the principles of natural justice and procedural fairness. These typically provide a good source of information to ensure your policy is achieving the requirement. The following link provides access to the NSW Ombudsman (as an example), Fact Sheet relating to Natural Justice and Procedural Fairness ([click](#)).

The remaining tricky component in these clauses relates to providing for independent third-party review where a complaint or an appeal remains unresolved. After the person has had an opportunity to make their complaint and receive a response, if they remain not satisfied with the process or response then they now have the right to request the RTO to have the matter reviewed by an independent third-party. Just to be clear, the independent third-party is not ASQA, is not the National Training Complaint Service and is not your State Fair Trading Authority. It is an independent third-party that you engage. This may be a professional complaints resolution service provider or a consultant that you engage to review and report back on the matter. You will need to establish arrangements for how this review will occur including how the person is engaged, the timeframe for their review, reporting requirements, actions on receiving their recommendations, et cetera. It's only after the person has made a complaint, received a formal reply by the RTO, is not satisfied and seeks a third-party review, the review is undertaken by the independent third-party and reported, that if the person remains not satisfied with the process then they have the option to take their complaint or appeal further to other authorities. They can clearly take their issue to these authorities before all of this has occurred; however, generally these authorities will require them to first utilise the RTO's complaints and appeals arrangements (there have been exceptions to this but generally this is the case).

The remaining specific items that the auditor will want to confirm are that you provide a written acknowledgement when you receive a complaint or an appeal to the person as soon as practicable. I suggest you do this within 24 hours. You should establish arrangements to provide the person with regular updates and ensure that the records of the complaint or the appeal are securely stored and kept confidential. Finally, at the end of the process you need to identify any opportunities for improvement to prevent the recurrence of the complaint/appeal. This requirement dovetails with clause 2.2 which identifies outcomes coming from complaints and appeals as an input to quality improvement. You need to be able to identify at the end of the complaints process that this action is undertaken and there is a systematic method of referring or reporting these opportunities for improvement.

Audit Guide – Clause 6.1-6.6	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Complaints and Appeals Policy – Complaints and Appeals Procedure – Complaints and Appeals Policy Forms and other forms – Complaints and Appeals register – Records of completed complaints or appeals (especially correspondence). – Opportunities for improvement that have resulted from handling complaints or appeals and evidence of how these have been acted upon 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have a suitable policy for the handling of complaints and appeals which adopts the principles of natural justice and procedural fairness, is publicly available and includes the procedure for submitting a complaint or appeal. – You provide a complaints and appeals arrangement which is broadly applicable not only for learners but also the RTO staff and third parties. – You acknowledge complaints and appeals as soon as practicable and provide regular updates to those making a complaint or seeking appeal – You resolve complaints and appeals as soon as practicable, but if the matter is likely to take longer than 60 days then you must advise the person in writing and provide regular updates. – You provide for an independent third-party review of complaints and appeals where this is requested. – You maintain the security of complaints and appeals records to ensure confidentiality and identify and act on opportunities for improvement resulting from complaints and appeals handling
<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through your complaints and appeals handling process? Is there a policy and procedure? Is this publicly available? – Do you have any examples of complaints over the last 12 months? Can I see all the documentation relating to these? – How do you record complaints and appeals. Do you place timeframes for the initial response to the candidate? – How do your arrangements adopt the principles of natural justice and procedural fairness? – Can you talk me through your arrangements to refer unresolved complaints and appeals to an independent third-party? – Can you identify any opportunities for improvement that have resulted from your complaints handling? 	

Audit Guide – Clause 7.3	
7.3. Where the RTO requires, either directly or through a third-party, a prospective or current learner to prepay fees in excess of a total of \$1500 (being the threshold prepaid fee amount), the RTO must meet the requirements set out in the Requirements for Fee Protection in Schedule 6.	
<p>What is this clause about: This clause requires the RTO to implement arrangements to protect the fees paid by learners in advance of services being provided. This is a requirement because following the GFC in 2008, more than a few RTO's went to the wall and took all of their learner's prepaid fees with them to the administrators. The standards currently give an RTO three options. The RTO may limit the amount required to be paid at any time by the learner to not exceed \$1500 in advance of services being provided (90% of RTOs), the RTO may hold an unconditional financial guarantee from a bank operating in Australia (very expensive to get) or the RTO may hold a current membership of a Tuition Assurance Scheme. There is a fourth alternative which allows the RTO to seek an alternative fee protection measure from the ASQA. The vast majority of RTO's utilise the standard option to limit the amount of fees charged in advance of services being provided to \$1500. There are a number of misconceptions about this requirement. The standard says that this applies to prospective or current learner's. So, this requirement is broader than just fees paid prior to the course commencement. It also relates to fees paid during the conduct of the course. To be clear, where any fee is required from a learner in advance of the services being provided; before or during the course, then any single payment cannot exceed \$1500.</p> <p>Take home point: Unless you have a contractual obligation to hold a membership in a Tuition Assurance Scheme (such as the VET Student Loan Scheme), you do not need it. I occasionally come across RTOs who do not have any such obligation but have been "convinced" by a Tuition Assurance Scheme that they must have membership to comply with this clause. Tuition Assurance could cost you between \$5,000 - \$12,000 per year. The Tuition Assurance provider is very happy to take your money. All you simply need to do is structure your fees so that no single payment in advance exceeds \$1,500. Easy! Beware of those who seek to take advantage of your ignorance.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Fee schedule and fee information included in pre-enrolment information – Access to learner records relating to fee payments – Tuition Assurance Scheme membership if applicable 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You do not require prospective or current learner's to prepay fees in excess of \$1500. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Are there any courses that you provide where you require payment in advance of services being provided in excess of \$1500?

Audit Guide – Clause 7.3	
<ul style="list-style-type: none">– Evidence of unconditional financial guarantee from a bank operating in Australia if applicable	<ul style="list-style-type: none">– Can you provide me a copy of your fee schedule or fee information that identifies the total amount and the required fee payments during learner's enrolment?– Can I access the payment details for the following students please?

Audit Guide – Clause 7.4	
7.4. The RTO holds public liability insurance that covers the scope of its operations throughout its registration period.	
<p>What is this clause about: This clause requires the RTO to hold current public liability insurance. This requirement was always audited by the regulator up until these new standards were introduced. Since 2015, I have not experienced an auditor requesting to verify public liability insurance of a client. Still, the requirement still exists and is a specified requirement of the legislative instrument Data Provision Requirements 2012 to supply this information to the regulator of request (click).</p> <p>There is nothing tricky about this clause. It is important to note that this clause only relates to public liability insurance. It is not a requirement of the standards for the RTO to hold any other type of insurance although good business practice will demand that the RTO hold relevant insurances to protect its assets. From the regulators perspective, they are only interested in public liability insurance as this relates to the protection of learners engaging with the RTO. The only other point to note about this requirement is that it must be for the same entity as listed on the national training register and confirm that the insurance covers training and assessment activities. To be clear about this, the certificate of currency issued by the insurer must clearly identify the same entity as the RTO listed on TGA. It must also identify that the insurance covers the entity for the delivery of training and assessment activities (or words to that effect). It is fairly common for this not to be included on the certificate of currency and it is usually quite easy to ask the broker to include this information. There is a misconception that the RTO's scope of registration should be included in the certificate of currency. I think this results from the words "scope of operation" being part of the clause. I have never seen this required in a regulatory audit and consider it to be an urban myth.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Copy of the current Certificate of Currency for Public Liability. – Evidence that the insurance relates to the RTO entity and for the delivery of training services. 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You hold public liability insurance that covers the scope of its operations throughout its registration period. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can I see the current Certificate of Currency for your Public Liability insurance and its policy document?

Audit Guide – Clause 8.1	
<p>8.1. The RTO cooperates with the VET Regulator:</p> <p>a) by providing accurate and truthful responses to information requests from the VET Regulator relevant to the RTO’s registration;</p> <p>b) in the conduct of audits and the monitoring of its operations;</p> <p>c) by providing quality/performance indicator data;</p> <p>d) by providing information about substantial changes to its operations or any event that would significantly affect the RTO’s ability to comply with these standards within 90 calendar days of the change occurring;</p> <p>e) by providing information about significant changes to its ownership within 90 calendar days of the change occurring; and</p> <p>f) in the retention, archiving, retrieval and transfer of records.</p>	
<p>What is this clause about: This clause requires the RTO to keep the National VET Regulator informed about changes to its operation and comply with requests for information and mandatory reporting obligations. These requirements include reporting quality indicator data each year no later than 30 June (click), reporting total VET activity data each year no later than 28th February (click), notifying ASQA of any material or significant changes to the RTO’s operation (click), transfer records to ASQA at the end of the RTO’s registration period (click). Of course, this last one is not usually audited. In fact, it may only be during an on-site renewal of registration or monitoring audit that this clause would be audited. There is no compliance requirement for the organisation to have documented arrangements around these requirements, although we do supply such a policy as it does provide the organisation point of reference and procedure to comply with these notification requirements. These items are quite easily audited based on the activity of the RTO. The primary means of auditing will be to request the RTO provide receipts for submissions it has made to the national regulator. These will be in the form of emails confirming the receipt of mandatory reporting and notification of changes.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Evidence of any notifications of changes submitted on ASQANet. These may include a change of contact details or a change of delivery sites. However minor the notification is, these provide valuable evidence of how you have kept the regulator informed about your current operation. It is recommended that any correspondence 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You comply with mandatory reporting requirements including quality indicator and total VET activity reporting. – You notify the regulator within 90 calendar days of the change occurring of any significant or material changes to the RTO operation.

Audit Guide – Clause 8.1	
<p>received from ASQA is filed onto a designated file to enable it to be accessed during a regulatory audit.</p> <ul style="list-style-type: none"> – Previous years Quality Indicator report - email receipt – Previous is total VET activity report - email receipt – Review the details on the national training register for the RTO and ensure that these are accurate well prior to the audit 	<p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Have you reported any material or significant changes to your operation to the regulator in the last 2 years? – Can I see your last Quality Indicator report please? Did you receive an email from ASQA confirming receipt of this report? – When and how did you submit your last total VET activity report? Did you receive an email from the NCVET confirming receipt of this report? – Looking at the current details on the national training register, are these details currently accurate and reflect the current operation?

Audit Guide – Clause 8.2	
<p>8.2. The RTO ensures that any third-party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:</p> <p>a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and</p> <p>b) in the conduct of audits and the monitoring of its operations.</p>	
<p>What are these clauses about: This clause requires the RTO to have in place an agreement with third parties that requires the third-party to cooperate with the VET regulator by providing accurate and factual responses to information requests by the VET regulator and to cooperate during the conduct of audits and monitoring of its operations. Standard 8 is all about requiring the RTO to cooperate with the VET regulator. It makes sense that if the RTO is engaged in 3rd party arrangements that the third-party also have an obligation to cooperate with the VET regulator. The only way of doing this is to make it mandatory that the RTO insert this clause into the third-party agreement.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Copy of all third-party agreements or MOUs indicating that the third-party must cooperate with the VET regulator by providing accurate and factual responses to information requests by the VET regulator and cooperate during the conduct of audits and monitoring of its operations (only required if using third-party arrangements). 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have included a specific clause in all third-party agreements that requires the third-party to cooperate with the VET regulator by providing accurate and factual responses to information requests by the VET regulator and to cooperate during the conduct of audits and monitoring of its operations. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Are you engaged in any third-party arrangements where others are delivering services on your behalf as an RTO? – Can you provide me the written agreement for these third-party arrangements please? – Can you show me where within this agreement you have specified the requirement for the third-party to cooperate with the VET regulator?

<p>Audit Guide – Clause 8.3</p>	
<p>8.3. The RTO notifies the Regulator:</p> <p>a) of any written agreement entered into under Clause 2.3 for the delivery of services on its behalf within 30 calendar days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and</p> <p>b) within 30 calendar days of the agreement coming to an end.</p>	
<p>What is this clause about: This clause requires the RTO to notify the VET regulator when it either commences or finalises a third-party arrangement. As opposed to clause 8.1 which allowed a notification within 90 days of the change occurring, the notification of third-party agreement must be provided within 30 calendar days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever comes first. The regulator wants to know about these arrangements before they commence. Why? Because third-party arrangements represent one of the most significant risks to the quality of training being provided within the VET sector. The VET regulator requires to be informed about these arrangements before they come into effect. ASQA is also required to be informed within 30 calendar days of the agreement coming to an end. It is quite rare for these notifications to derive any response from the regulator. Only on number of occasions I have observed the regulator respond to the notification to request more information about the arrangement. This information has included the training and assessment strategy for the intended delivery, the qualification and competency details of the nominated trainers in support of the arrangement, details of delivery sites and a copy of the third-party agreement. To facilitate notification ASQA has provided the following online form: Third Party Service Arrangement notification form.</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Copy of all third-party agreements or MOUs. – Evidence of notification to the VET regulator for the delivery of services on its behalf by a third-party prior to these arrangements taking effect. <p>Find more information on the ASQA website: Click Here</p>	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have provided notification to ASQA of any third-party arrangements within 30 calendar days of the written agreement being entered into and within 30 calendar days of the written agreement coming to an end. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Has notification being provided to ASQA in respect of these third-party arrangements? – Did you receive an email receipt for these notifications?

Audit Guide – Clause 8.5-8.6	
8.5. The RTO complies with Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations.	
8.6. The RTO ensures its staff and clients are informed of any changes to legislative and regulatory requirements that affect the services delivered.	
<p>What is this clause about: This clause (8.5) requires the RTO to ensure that it is complying with the Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations. It is quite rare for the regulator to audit compliance with legislation other than the one that it is responsible for being the <i>National Vocational Education and Training Regulator Act 2011</i>. In fact, it's not just a rare, they just don't do it. This is a mutual support clause that ties the conduct of the RTO in with other relevant legislation that applies to it. Typically, if an auditor identifies something at an audit that they feel is non-compliance with other legislation (such as a breach of privacy legislation) then this is recorded within the audit notes and report and then referred via ASQA to the relevant statutory authority who oversees the regulation of the relevant legislation. Noting all of this, the RTO does need to do an analysis of the legislation and regulatory requirements that is applicable to its operation. Legislation that applies to work health and safety, discrimination, privacy, unique student identifier and consumer protection are all obvious and generally applicable to every RTO.</p> <p>The clause 8.6 is more frequently audited and requires the RTO to demonstrate that it not only has suitable arrangements in place to comply with relevant legislation but has established arrangements to inform staff and clients about this legislation. This might occur during a staff induction where they are provided information about legislative compliance requirements and then provided with updates as they are required. In respect of learners, the RTO might generally provide learners with information about relevant legislative compliance obligations within the learner handbook. This might be as simple as a section that informs the prospective learner about how their personal information will be handled and what rights they have in respect of their privacy protection or how to contribute to maintaining a safe environment whilst engaging with the RTO. For audit purposes, it is desirable that the RTO obtain an acknowledgement from these stakeholders that they have been informed about their legislative obligations. For learners, this may be incorporated into their enrolment agreement and for staff may be incorporated into their employment agreement. You can subscribe to updates to legislation at the Federal Register of Legislation (click)</p>	
<p>Evidence to prepare:</p> <ul style="list-style-type: none"> – Policies relating to compliance with legislation such as training safety, equity, discrimination, privacy, copyright, fair trading, etc 	<p>You must be able to demonstrate that:</p> <ul style="list-style-type: none"> – You have established arrangements to comply with relevant Commonwealth, State and Territory legislation and regulatory requirements.

Audit Guide – Clause 8.5-8.6	
<ul style="list-style-type: none"> – Information sources that inform staff of their legal obligations such as relevant policy, employment agreements all public information available from relevant statutory authorities. – Staff induction records where staff have signed to acknowledge their duties and responsibilities relevant to legislative obligations. – Learner handbook or other information source that informs learners of their rights and obligations. – Enrollment record that confirms learners are provided information about their responsibilities and obligations with legislation. – Arrangements (and examples) to educate staff of their legislative responsibilities such as an agenda item in a staff meeting specifically relating to legislative compliance. 	<ul style="list-style-type: none"> – You have established and apply arrangements to ensure that staff and learners are informed of any changes to legislative and regulatory requirements that affect the services delivered. <p>You should prepare for these types of questions:</p> <ul style="list-style-type: none"> – Can you talk me through the arrangements you have established to comply with relevant Commonwealth, State and Territory legislation and regulatory requirements? – You mentioned that you have established arrangements to comply with privacy legislation, can you show me this and talk me through how it works? – You mention here in your work health and safety policy that you maintain a near miss register. Can I see this register please? – What is your process to inform staff and contractors working on your behalf of their responsibilities and obligations with legislation relevant to your operation? – Can I see a completed example of a staff induction record? – Can you talk me through what steps you take to ensure that learners commencing a course with you are informed about their responsibilities and obligations with relevant legislation? – Can I see a signed acknowledgement from a learner relating to their legislative responsibilities and obligations? – How do you monitor or get informed of any relevant changes to legislation? – How do you update staff and learners about any relevant changes to legislation? Can I see an example of this?

Engaging in the Audit

The audit process can be very stressful. I get that. But it's time to man-up or women-up as is most likely the case! You have done the hard work and have scoured every inch of your RTO finding the issues and have put in place compliant arrangements to prevent potential non-compliances. Great work! Your audit is approaching and it is now time to showcase your RTO to the regulator. How does the audit process work?

If you are seeking a renewal of registration then you would have completed the application approximately 90 days before the end of your current registration period. The application is quite simple and includes some entity documents, declarations and the details of your operation. Take the opportunity during your renewal of registration to review your scope of registration. Get rid of the items on your scope that you are needing to maintain and do not get any commercial return on. Think of scope of registration as an asset that needs to be maintained. If you are not getting a return of that asset then move it on.

Delivery Activity Data Summary

About 12 to 10 weeks out from the audit, a Support Officer within the regional office will send an email requesting the provision of RTO Delivery Data. This information is requested to be compiled into the ASQA Delivery Activity Data Summary ([click](#)). This information return will need to include all training products on your scope of information and be accurately compiled. This information may be cross checked with your student information system data during the site visit so make sure it is accurate. This data is used to develop the scope of the regulatory audit. The selection of training products to be audited is influenced by the degree of activity (enrolments/completions), delivery locations and industry areas. We find that ASQA will generally audit 2 training products from each industry area where delivery has occurred. If you have training products on your scope that have been approved without an audit then these will generally be audited if delivery has occurred. If you have notified the regulator of training products which are utilised in third-party arrangement, then these will always be audited.

Student survey

About 10 to 8 weeks out from the audit, you may be provided an email from ASQA requesting that you forward a templated email to a sample of students containing an invitation to complete a student survey. The survey is now a standard component of the ASQA new audit model and focuses on seeking feedback from your learners about their experience in relation to marketing and recruitment, their enrolment, support services, their training and assessment and completion. You will generally not receive any feedback or notification of the results of this survey. It is intended to inform ASQA's audit approach including their selection of audit scope and site visits. You can read more about how the student surveys are conducted at the following link ([click](#)). Be aware that student surveys may also occur at other times outside the audit process.

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Audit scheduling

About 8 to 6 weeks out from your audit date the ASQA auditor will generally give you a call and introduce themselves and propose an audit date. You generally are required to accept this date but there is some wriggle room. If you have something major happening at that time, then you can request an alternative date that is more suitable. The time to do this is during the initial phone call so in the preparation for an audit make sure you are aware of your schedule and the timeframe that is most suitable for you to engage in the audit. It will not be acceptable to push the audit date back too far so generally try and work in the timeframe the auditor has suggested.

Notice of scheduled site audit and request for pre-audit evidence

About 6 to 4 weeks out from your audit, you will be provided with a "Notice of scheduled site audit" which is provided via email. The notice identifies that the audit has been scheduled and the legislation under which the audit is being conducted. The details of the site visit will be provided, so check these and make sure the auditor is coming to the right address on the date agreed. If any of the details are not correct it is quite straightforward to email the auditor back and inform them of the discrepancy. ASQA will always initially seek to conduct the audit at the nominated head office of the RTO. The notice will also inform you of the audit scope which will include the clauses to be audited and the qualifications or training products selected from your scope of registration to be sampled in the audit. Be aware that; where a qualification is being audited, you will not be advised of the units of competency to be sampled in those qualifications until the day of the site visit. This is why you need to have everything ready.

Most importantly, the notice will request some evidence to be sent to the auditor prior to the site visit. This is called 'pre-audit evidence'. The auditor will list the items required and specify a date the information is required to be provided. The pre-audit evidence is typically emailed to the regional office. These emails are a standard template; however, the auditor does have the allowance to amend this template and request other pre-audit evidence on top of the standard list. The Melbourne office is notorious for this. The following are the standard items that will be requested as pre-audit evidence:

1. Strategies for training and assessment for all training products listed.
2. A copy of any agreements your organisation has in place with other parties to deliver or assess the above training products on your behalf.
3. Details of each trainer and assessor's qualifications, training/assessment & vocational competence and industry currency - as relevant to the above training products.
4. A copy of your organisation's marketing materials relevant to the above training products i.e. student information handbook

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Other items that auditors may include in addition to the above items are the RTO Staff Handbook or Policy and Procedure. Some auditors will also request a sample of the assessments being used for a qualification although this is becoming rarer. Make sure that you send this pre-audit evidence as one consolidated submission on or prior to the date nominated. I generally apply a rule that any document provided to the regulator is always provided in a PDF format. This prevents the format of documents being smashed by different software programs. If I have several files to be sent, I will always get the client to pop these into a zip folder to be sent as one attachment. Be aware that the ASQA email gateway will accept emails up to about 12 meg. Beyond that, you might consider sending a link to a shared folder such as dropbox. We have done this quite regularly and ASQA seem fine to click on the link and download files. There were a few olds and bolts in the Sydney office that struggled with this, but I think they are ok now. :) Ok, pre-audit evidence sent,,, Tick!

The site visit

You are nervous. I know. But it is time to put your best foot forward and showcase the compliance and systems of your RTO. The site visit may be conducted over several days. Typically for a small scope of registration involving 1 or 2 qualifications, the audit could be conducted by one person on a single day. It is very common in an audit to have an experienced auditor teamed up with a person who is learning the ropes. ASQA have been haemorrhaging experienced auditors so there is lots of new faces out there under instruction in the 'workplace'.

The audit will commence with an opening meeting where the auditor will explain the audit process and the legislation under which the audit is conducted. The auditor will explain how evidence will be gathered and the potential consequences that may result from the audit. This is all standard stuff, so don't think that you auditor is particularly scary at this point. You will be required to sign a sheet that indicates your attendance at the opening meeting. This is normal. I typically recommend clients to have a very brief presentation ready to present to the auditor. When I say brief I seriously mean 5-7 minutes. The auditor will be keen to get started with the first standard but this is an opportunity for you to provide the auditor some context to your operation. Auditing like risk assessment is all about the context. The auditor will have been provided some information about your organisation, but nobody knows your organisation better than you. A quick opening brief sets the context and gives you the opportunity to explain some basic operational aspects that might influence how your services are delivered. I suggest the following key points:

- Open and welcome
- Identify the entity and branding
- Show the organisational structure and appointments

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- Identify the operating locations facilities
- Identify the target learner
- Briefly describe the delivery model
- Briefly address perceived any risks such as third-party arrangements

During the audit

Ok, the audit has now commenced and the auditor will open with a standard and a clause and fire off their first question. ASQA have recently introduced their new audit model. There is a good explanation of this at the following link ([click](#)). Following this model, the auditor will commence with standard 4 relating to marketing and work their way through various clauses until they arrive at standard 3 relating to the issuance of AQF certificates. This is what we call holistic auditing and is not new to the VET sector. I first used holistic auditing with NARA who introduced a student pathway model which is basically the same (everything old is new again!). Most auditors struggle with this type of model, particularly if their audit tool or report is not formatted in this sequence. Don't be surprised if the auditor does not follow the 'new audit model' and defaults back into a lineal audit approach commencing with standard 1. In reality, it doesn't really matter. You will simply respond to questions and requests for evidence as they occur.

Just a couple of main points to finish off with to follow during the conduct of the audit:

- I recommend that you set up the room for the audit with the big table in the middle that seats up to 6-8 people, like a conference table. Make sure you run power under the table so that you and the auditor can plug their computers in. Virtually all auditors these days will arrive with a laptop. On this table, have your computer set up and connected to a projector which is projecting information on to the wall. Most audit evidence these days can be presented electronically and auditors are fine with this (generally). I always tell clients that an audit is a show and tell process.
- Make sure you have at least 2-3 people from your organisation involved in the audit. If you are a small RTO and it means that you need to pull a trainer in for the day, then do it. There will usually be one primary person that is responding to the questions. The other people are taking notes, disappearing to retrieve evidence from another room and also operating the computer and projector. It is desirable that the person who is responding to questions is not also trying to navigate the

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computer. If you have prepared for the evidence and questions in this guide, then you will know what to expect and as soon as the auditor mentions some keywords, the person on the computer is already moving to that evidence.

- Just a small point about having people other than yourself attending the audit. First thing is, try to avoid having any alpha male/female personality types in on the audit. Unless you have confidence that they can control themselves for the day, it is not the time to have anyone in there that will intimidate the auditor or impose some silly show of strength. This is a waste of emotional energy and usually only impact negatively on your audit. The auditor is running the show, so let them be 'in-charge' and cooperate with them professionally and with confidence. I also **do not** recommend that you have your consultant in on your audit. We do not attend our client's audits. Actually we do make an exception for a couple of auditors in the Sydney office, but other than this; we take the approach that our client needs to know their stuff and represent themselves. Through coaching and practice audits, we prepare the client to tackle anything that comes. Beware of consultants who do not take this approach. They are not doing you any favours short or long term. Most auditors think very poorly of an RTO that needs their consultant to be at the audit.
- Make sure that you take notes. Come organised with the basic document with all the clauses to be audited listed with lots of space to record notes. Generally, take notes on the questions that the auditor asks and their response to the evidence you present. Particularly note issues that arise where the auditor may consider something non-compliant or request additional evidence. If there are non-compliances, then these notes will be critical for you to commence your rectification work directly following the audit. I recommend that our clients get at least two people taking notes. The morning after the audit, get together and conduct a wash-up and consolidate the notes, findings and opportunities for improvement. These small initiatives can have a very powerful and positive effect.
- Try and have all the evidence available in the room. It is a huge time waster if people need to leave the audit to go and find evidence in another location of the building. Most evidence will be electronic and will be on the computer. Other evidence that is not on the computer may include things like learner records. Now, we do not know which learners the auditor will sample but I would recommend having up to 10 complete learner records for the qualifications being audited based on learners that have completed the relevant courses in the last 6 months. The auditor may not select these but you can offer them and this may save some time during the day. Also, have a side table in the room with relevant hard copy documents of evidence that the auditor may request. I typically recommend that the client have a hard copy of their policy and procedure, learner handbook, enrolment information package, examples of marketing, sample AQF certificates, training and assessment strategies and training qualifications/PD. If your audit is an initial registration, I **do not** recommend printing every assessment guide and learning guide for the audit. Maybe print one unit just as a sample and allow the auditor to select their sample and then be prepared to print these documents on demand. The auditor may also be happy to view these documents via the projector.

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- When responding to questions, don't think that you need to have every single detail in your mind. A strategy that I coach clients with is to prepare them to provide a broad response in relation to an initial question about a clause. As an example, the auditor might ask: *"Can you talk me through your arrangements to handle complaints and appeals?"*. That is a big question and not something that can really be answered in a single response. I would recommend that you would respond with something like: *"Yes, well we have established details within the learner handbook to inform the learner about their right to make a complaint or seeking appeal. We also have a policy and procedure that guides our approach in responding to and handling complaints and appeals. This includes an arrangement for an independent third party review. These policies are available to the public on our website. We also establish a link between the outcomes of complaints and appeals and our continuous improvement process."* Now, you will notice in this response that I have simply canvassed the overarching arrangements and have not got into detail. This now presents the opportunity for the auditor to ask a secondary question, which will usually be at a lower level of evidence and something that you can then show and explain.
- Final point, you need to fight the fight. During the audit, there may be occasions where the auditor raises concern about your approach or operation and indicates that they do not think that it meets the requirements of the standard. This is not the time to lie down and allow the auditor to wash over you. It is a call to action that must be responded to. You need to professionally and politely explain your arrangements and present further details that may address the auditor's concerns. This is particularly important in the auditing of assessment where your subject matter expertise is a key factor in explaining how the assessment meets the requirements of the unit of competency. My point is, if a problem arises and you don't respond to address it then it will flow through to a non-compliance. If it is non-compliant then, ok, but if the auditor is applying their personal preferences on the audit, you need to call this out and seek clarification on where this requirement is specified within the standards. You can spot personal preferences very easily if you know the standards. A simple question like: *"Is this something that you personally prefer to see or is this actually specified within the standards"* Key point is, fight the fight and don't allow the auditor to come to conclusions before they have seen every scrap of evidence that is relevant. Do not allow the auditor to impose their personal preferences in the audit. Call it out!!
- Sorry, second final point, if minor issues arise with documentation during the day, then have someone available in the room that can scurry away onto a computer in another room and fix the issue and bring back rectified evidence. Don't particularly asked for permission to do this, just do it and provide the rectified evidence (you can gauge this yourself based on how reasonable the auditor is). If you ask for allowance to do this, some audiences will deny the request based on their lack of understanding or acceptance of the audit evidence process. Once the evidence is presented to them, then it is difficult for them to ignore. Also, if there are some very minor issues that can be rectified post audit (that night), then seek an allowance from the auditor to provide them this information either overnight or within a few hours following the audit. Sometimes there are the most minor issues which can be easily rectified and which potentially hold up a fully compliant audit outcome. Most reasonable auditors will allow the RTO to make a quick change and provide supplementary evidence.

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Ok, that is it!

Seriously, good luck with your audit. If you get some non-compliances, it is not the end of the world. Commence your rectification work straight away and confirm the requirements in the audit report and then submit overwhelming evidence that puts these non-compliances to bed. If you have done the work, then these non-compliances should be minor at best. If you get through the audit without any non-compliances, then you are a champion. Celebrate with a nice glass of champagne. :)

Good training.

Joe Newbery

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