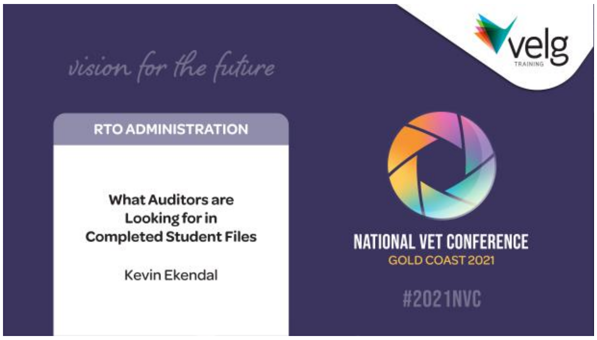
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TRAINING
RTO ADMINISTRATION
What Auditors are Looking for in Completed Student Files
Kevin Ekendal
NATIONAL VET CONFERENCE
GOLD COAST 2021
#2021NVC


ABOUT: KEVIN EKENDAHL
Kevin Ekendahl is the Managing Director of Audit Express. He has bee involved in the tertiary education sector for more than 12 years in management and quality assurance roles. Kevin's expertise is in governance, quality assurance and internal auditing, and provides these services in a range of industries. His main focus is making sure organisations build the capability of their teams to make sure they continue to provide quality educational services.
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What auditors are looking for in completed student files

Topics to be covered...

1. Standards, criteria and context setting

2. The difference between student administration files & student assessment files

3. Which approach and tools are best for student file management

4. What must be in a student administration file and student assessment file

5. How do auditors know what is missing from student files?

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Relevant Criteria

Standards for RTOs 2015

- Clauses:
  - ✓ 1.1-1.2 Training and assessment strategies & amount of training
  - ✓ 1.7 Learner support
  - ✓ 1.8 Assessment
  - ✓ 2.2 Continuous improvement
  - ✓ 3.1-3.6 AQF certification documentation
  - ✓ 5.1-5.4 Learners are informed & protected
  - ✓ 6.1-6.6 Complaints & appeals
  - ✓ 7.3 Fees paid
  - ✓ 7.5 Data Provision Requirements (AVETMISS)

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What criteria would be relevant to student files?

STANDARDS FOR RTOS 2015

STATE FUNDING CONTRACTS

YOUR OWN POLICIES AND PROCEDURES

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Audit
Triangle
CRITERIA
RTO Standards
Funding Contracts
DOCUMENTS
Policies
Procedures
Processes
TASs
Audit
RECORDS
Learner Files
Transactions
AuditExpress


Audit
Triangle
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RECORDS
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• Transactions
AuditExpress


What to expect from an audit with the VET Regulator
1
Notice of Audit
2
Pre Audit Evidence
3
Onsite Audit
4
Audit Report
5
Post Audit Action


What to expect from an audit with the VET Regulator
1
Notice of Audit
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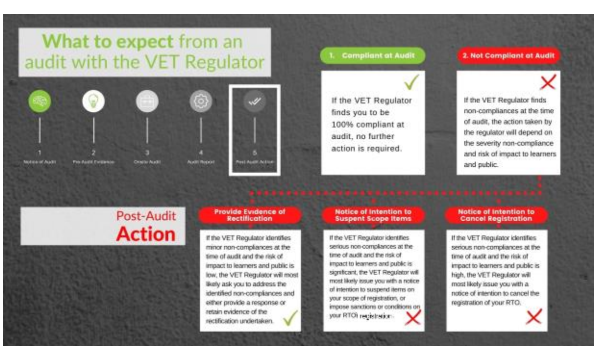
5
Post Audit Action
Pre-Audit Evidence
1. Policies & Procedures
2. Student Data
3. Training and Assessment Strategies
4. Copies of Learning Materials
5. Copies of Assessment Tools
6. Course Flyers, Advertising & Marketing Materials


What to expect from an audit with the VET Regulator
1
2
3
4
5
Onsite Audit
1. Entry Meeting
2. Review of Evidence
3. Staff and Trainer Interviews
4. Student Interviews
5. Exit Meeting


What to expect from an audit with the VET Regulator
1
2
3
4
5
ASQA
Audit report: Old Town College Pty Ltd


What to expect from an audit with the VET Regulator
1
2
3
4
5
1. Compliant at Audit
If the VET Regulator finds you to be 100% compliant at audit, no further action is required.
2. Not Compliant at Audit
If the VET Regulator finds non-compliances at the time of audit, the action taken by the regulator will depend on the severity non-compliance and risk of impact to learners and public.
Post-Audit
Action
Provide Evidence of Rectification
If the VET Regulator identifies minor non-compliances at the time of audit and the risk of impact to learners and public is low, the VET Regulator will most likely ask you to address the identified non-compliances and either provide a response or retain evidence of the rectification undertaken.
Notice of Intention to Suspent Scope Items
If the VET Regulator identifies serious non-compliances at the time of audit and the risk of impact to learners and public is significant, the VET Regulator will most likely issue you with a notice of intention to suspend items on your scope of registration, or impose sanctions or conditions on your RTO's registration.
Notice of Intention to Cancel Registration
If the VET Regulator identifies serious non-compliances at the time of audit and the risk of impact to learners and public is high, the VET Regulator will most likely issue you with a notice of intention to cancel the registration of your RTO.


When things don't go to plan:
Post-Audit Rectification
1
Receive Audit Report from VET Regulator
2
Define Rectification Project Team & Working Groups.
3
Determine any support needs & engage a reputable consulting firm ASAP.
4
Engage a reputable legal practitioner that is experienced in responding to the VET Regulator.
5
Create a detailed Rectification Plan
6
• Rectify all identified non-compliances
• Undertake a Quality Review of all evidence
• Prepare a letter of response, clearly mapping out how you have addressed all non-compliances.
7
Submit Rectification Response to the VET Regulator & wait.....


Remedial Action
DETERMINE IMPACT
Review all student files and records to determine which students have been impacted by the non-compliant delivery and/or assessment of units.
RE-TRAIN
Retrain students that have been impacted by the non-compliant delivery and/or assessment of units.
RE-ASSESS
Re-assess students that have been impacted by the non-compliant delivery and/or assessment of units.
RECALL
Recall the qualifications and statements of attainment of students
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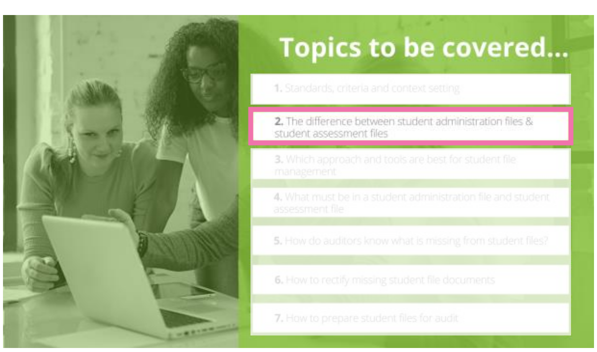
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Student Files

A look inside your student files will give us a **huge amount of evidence** to support how you meet your obligations.

The omission of evidence also tells us a story about how you meet your obligations (or not).

Understanding Student Records

What's inside your files?

Student Administration Evidence

What records do you maintain for the administration of the learner?

- What information was given to the learner prior to enrolment?
- What was the process you went through to determine the appropriateness and suitability of the program for the learner?
- What information did you collect from the learner?
- What advice did you provide to the learner?
- How did you determine the existing skills and competencies of learners?

Student Assessment Evidence

What training was provided to the learner and what evidence do you have to confirm their competency?

- What did the individual learn? What content was provided to them?
- What amount of training did they participate in? - Do you have records of participation and attendance?
- What evidence did they provide to demonstrate competency?

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Maintaining good records

Records can be in electronic or hardcopy format.

Student Management Systems

Learning Management Systems

Paper-based Systems ?

What to consider when creating an effective record management system

- **Who** needs to access the records?
- **Security** and privacy
- Record, track and **monitor** documents
- Regularly **audit** your records
- **Destroy** records and maintain confidentiality
- **Digitise** physical records
- Maintain **registers** and **control** access

Maintaining good records

- Who needs to access the records?
- How will you create the records… Electronic? Hardcopy?
- How will you continue to collect the records?

- Do you need different access to records? (admin versus teaching and learning?)

Retention of records

Different records will require different retention requirements:

- Standards for RTOs 2015 (and the ASQA General Direction)
- Standards for RTOs 2015 – Schedule 5
- State Funding Contracts
- VET Student Loans
- Australian Taxation Office

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Retention and destruction of records

Recommendation: Maintain all relevant records according to the most onerous of your requirements.

Keep records of what records have been destroyed.

What. When. Who & How.

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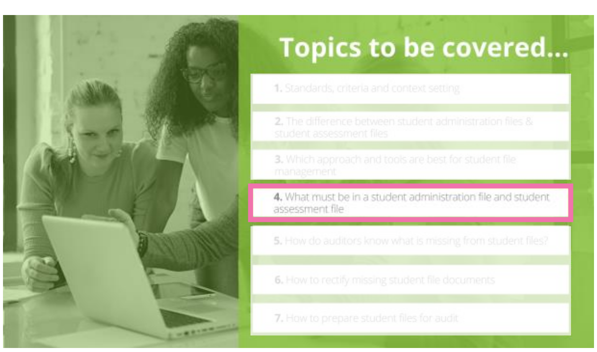

Relevant Criteria

- Standards for RTOs 2015
  - Clauses:
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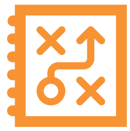

Training & Assessment Strategies (incl amount of training)
Clauses 1.1-1.2

Have you determined an amount of training which takes into account the existing ***skills****,* ***knowledge*** *and* ***experience*** *of the learner?*

How do you ***determine*** *the existing skills, knowledge and experience of each learner?*

Do you ***retain evidence*** *of this determination for each learner?*
(hint: do you undertake a pre-training review? Refer to clause 5.1)

Learner Support
Clause 1.7

How did you determine the ***support needs*** *of the individual learner?*

Did you undertake a ***language, literacy & numeracy assessment****?*

What was the ***outcome*** *of the assessment? Did you* ***take action****?*

What support did you ***provide*** *to the individual?*

Assessment
Clause 1.8

Was assessment conducted in accordance with the Principles of Assessment and Rules of Evidence?

Does the evidence on file demonstrate that the assessments were:

Fair
Flexible
Valid
Reliable

Valid
Sufficient
Authentic
Current

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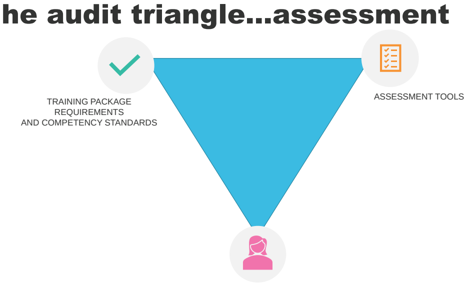
The audit triangle…assessment



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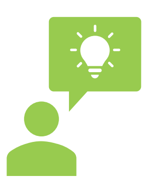
Continuous Improvement
Clause 2.2

*How do you collect **feedback from learners**?*
(this includes complaints, surveys and the quality indicators)

*Do you **act** on the feedback?*

*Have you **improved** your systems and processes from this feedback?*



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AQF certification documentation
Clauses 3.1-3.6

Have you ensured that the learner has ***met all the requirements*** *of the training product prior to issuing AQF certification documentation?*

Does the document you supplied to the learner meet the requirements of the ***AQF/Schedule 5****?*

Did you provide the certification within the ***required 30 days****?*

Did you ***retain evidence*** *of credit transfers? Did you* ***verify*** *this evidence?*

Did you meet the requirements of the ***USI*** *prior to issuing any AQF certification documentation?*

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Learners are informed & protected
Clauses 5.1-5.4

Clause 5.1 – Pre-training review
Have you undertaken an assessment of the existing skills and competencies of each individual learner?

Clause 5.2 – Provision of information
What information did you give to each learner? How can you prove what you gave them at the time?

Clause 5.3 & 7.3 – Fees and charges
Did you provide relevant information to learners? How much did you tell them you would charge? Did you charge them the right amount? And did you meet your obligations with clause 7.3?

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Complaints & Appeals
Clauses 6.1-6.6

Do you ***keep records*** *of all complaints, appeals and feedback?*

Are you able to ***demonstrate how you dealt*** *with all complaints relating to each individual?*

Did you meet the ***requirements of the standard****?*

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Data Provision Requirements
Clause 7.5

*Have you collected all the **AVETMISS records**? Did you act on this information?*

*What information do you store on your **student management system**?*

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Student Files

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What are auditors looking for?

- Compliance with Standards/contract
- Process and controls
- Good practice

Something missing ?

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What to do if something is missing

- Notify management and follow any organisational policy/procedure.
- Attempt to locate the record as best as possible.
- Create file notes indicating that you have identified a record is missing, why it's missing and what attempts have been made to locate it.
- Notify the relevant stakeholders (learner, trainer/assessor, management).
- You may need to notify the relevant funding body/regulator if this is a material non-compliance.

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You must keep accurate and authentic records

Do not falsify or re-create records which are not authentic or accurate.

It is best to make file notes and create a record of your actions to rectify and remediate the non-conformance.

Topics to be covered...

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QUALITY ASSURANCE VS QUALITY CONTROL

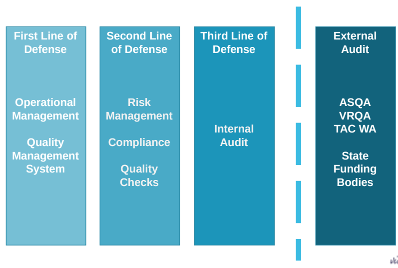
Quality Assurance

Providing confidence that the product/service will fulfil requirements.

Quality Control

Operational activities used to fulfil requirements.

Lines of Defense



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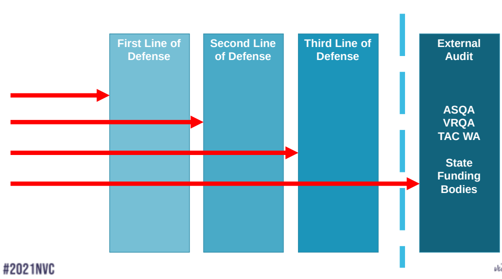
Lines of Defense



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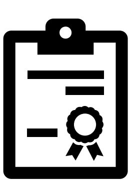
Implement Quality Controls



Your **systems** and **processes** should include *regular checks* of learner files to identify non-conformances and check that the ongoing transactions are being completed as intended.

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Implement
Quality Assurance
Measures

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INTERNAL AUDIT
Check your work & put your team to the test

Why are Internal Audits important?

1. Internal Audit is a pillar of **Good Governance**
2. It provides Directors and CEOs with an independent view of **risk and appropriate controls**
3. Contributes to a **risk and compliance culture** in your organisation
4. Provides you with a road-map of your **areas for improvement**
5. **Prepares your team** for external audits with the VET regulator

INTERNAL AUDIT
Establish your Internal audit program

Internal Audit Program

1. Take a **risk-based approach** to review your high-risk areas
2. Establish an internal audit program that will focus on your **key risk areas.**
3. Internal audit program should be based on the **size and nature** of your organisation.
4. Ensure that the people auditing are **independent and objective** to the operation being audited.

Regularly reviewing, checking and improving your systems will ensure you are in a **continual state of preparedness**.

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WHAT WE HAVE COVERED…

- The difference between student administration files and student assessment files
- Which approach and tools are best for student file management?
- What must be in a student administration file and student assessment file
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- How to rectify missing student file documents
- How to prepare student files for audit

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THANK YOU FOR YOUR COMPANY

We really hope you enjoyed engaging with Kevin Ekendahl for your presentation today.

If you have any queries or feedback relating to today's topic, or any general questions regarding your role within the VET sector, do not hesitate to contact the team at Velg Training.

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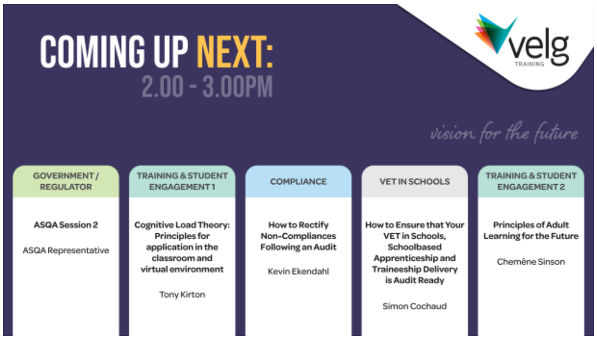
COMING UP NEXT:
2.00 - 3.00PM
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TRAINING
vision for the future
GOVERNMENT / REGULATOR
ASQA Session 2
ASQA Representative
TRAINING & STUDENT ENGAGEMENT 1
Cognitive Load Theory: Principles for application in the classroom and virtual environment
Tony Kirton
COMPLIANCE
How to Rectify Non-Compliances Following an Audit
Kevin Ekendahl
VET IN SCHOOLS
How to Ensure that Your VET in Schools, Schoolbased Apprenticeship and Traineeship Delivery is Audit Ready
Simon Cochaud
TRAINING & STUDENT ENGAGEMENT 2
Principles of Adult Learning for the Future
Chemène Sinson