

vision for the future



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 been 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.

Phone: 1300 73 55 41

Email: kevin@auditexpress.com.au

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A group of people, including a woman in the foreground and several others in the background, are gathered around a table with laptops, appearing to be in a collaborative work or study environment. A large green semi-transparent rectangle is overlaid on the right side of the image, containing white text.

What auditors
are looking for
in completed
student files

A photograph of two women, one with blonde hair and one with dark curly hair and glasses, looking at a laptop screen. The image is overlaid with a green tint.

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?
6. How to rectify missing student file documents
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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)



What criteria would be relevant to student files?



STANDARDS FOR
RTOS 2015



STATE FUNDING
CONTRACTS



YOUR OWN POLICIES
AND PROCEDURES

Audit Triangle

CRITERIA

- RTO Standards
- Funding Contracts



DOCUMENTS

- Policies
- Procedures
- Processes
- TASs

RECORDS

- Learner Files
- Transactions



Audit Triangle



Audit Triangle

CRITERIA

- RTO Standards
- Funding Contracts



DOCUMENTS

- Policies
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RECORDS

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Audit Triangle

CRITERIA

- RTO Standards
- Funding Contracts



Audit



RECORDS

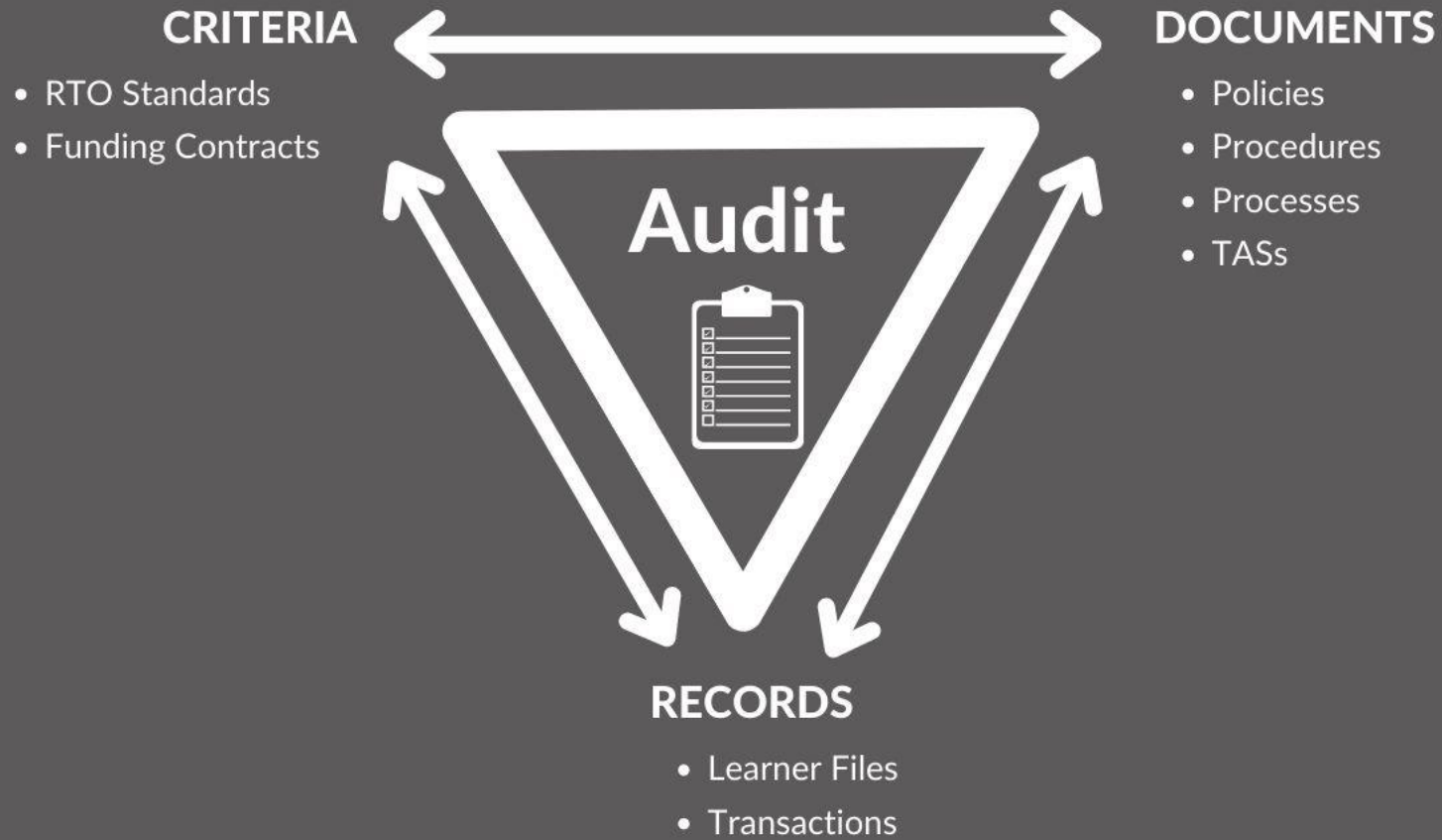
- Learner Files
- Transactions

DOCUMENTS

- Policies
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Audit Triangle



Audit Triangle



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

1/10/2020

Joe Bloggs
1 High St
Old Town
NSW 2001

By email to: joe.bloggs@college.edu.au

RTO ID: 123456

Application Number: XXXXXXXXXXXXX

Audit Number: AUDXXXXXXXXXXXX

Dear Mr Bloggs,

Notice of Audit (Re-registration)

This notice is to confirm the Australian Skills Quality Authority (ASQA) - the national regulator for Australia's vocational education and training (VET) sector - will shortly be conducting a site audit of your organisation and I have been assigned as the lead auditor.

In line with our recent discussion, the audit arrangements are as follows:

Date:	30 October 2020
Address:	Level 1, 1 High St, OLD TOWN 2001
Arrival time for auditor(s)	9:00 am
Opening meeting to commence at:	9:15 am

I will be assisted by Bobby Dazzler.

Reason for audit

This audit is being conducted to assess your organisation's ongoing compliance with the:

- National Vocational Education and Training Regulator Act 2011 (NVR Act) which includes the requirements of the Standards for Registered Training Organisations 2015 (Standards for RTOs).

The audit will also inform ASQA's response to the recently submitted renewal application.

Scope of audit

Regulatory obligations to be audited include:

Standards for RTOs: 4.1, 5.1, 5.2, 5.3, 7.3, 1.7, 1.1, 1.2, 1.3, 1.8, 1.13 -1.18, 1.20, 3.1, 2.3, 2.4, 8.2

The training products to be audited, as a minimum sample, include:

1. BSB50215 Diploma of Business
2. BSB51918 Diploma of Leadership and Management
3. CHC50113 Diploma of Early Childhood Education and Care

Evidence required prior to site audit

As part of the pre audit preparation process, you are requested to provide information to assist ASQA in planning and scoping the audit activity.

Please provide this information to compliancesydney@asqa.gov.au no later than COB Thursday 24 January 2019.

1. Strategies for training and assessment for all training products listed above.

Australian Skills
Quality Authority
ABN 72 581 678 650
GPO Box 9028
Melbourne VIC 3001
Info line 1800 751 850
www.asqa.gov.au

What to expect from an audit with the VET Regulator



1

Notice of Audit



2

Pre-Audit Evidence



3

Onsite Audit



4

Audit Report



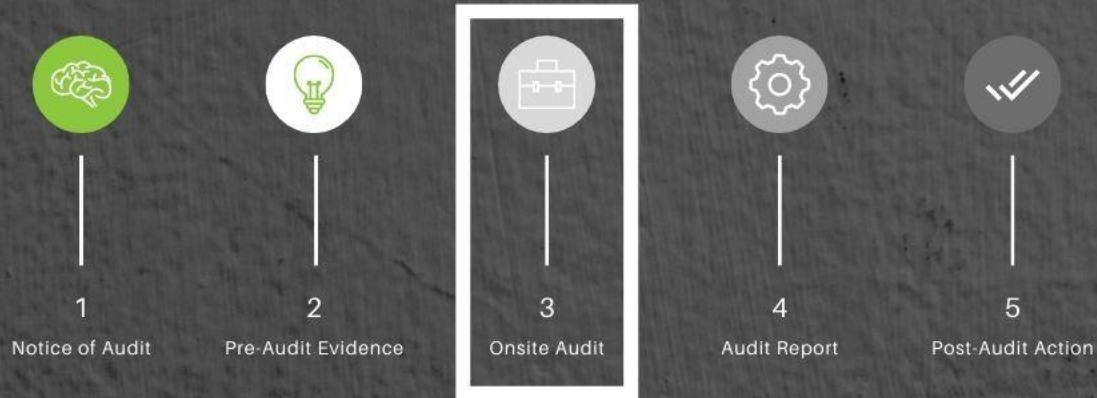
5

Post-Audit Action

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



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

Notice of Audit



2

Pre-Audit Evidence



3

Onsite Audit



4

Audit Report



5

Post-Audit Action

Australian Government
Australian Skills Quality Authority

Audit report: Old Town College Pty Ltd

RTO number:	123456
CRICOS number:	XXXXXXXXXX
Date/s of site visit:	XXXXXXXXXX
Date report created:	30/10/2020

What to expect from an audit with the VET Regulator



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 Suspend 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



AuditExpress

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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

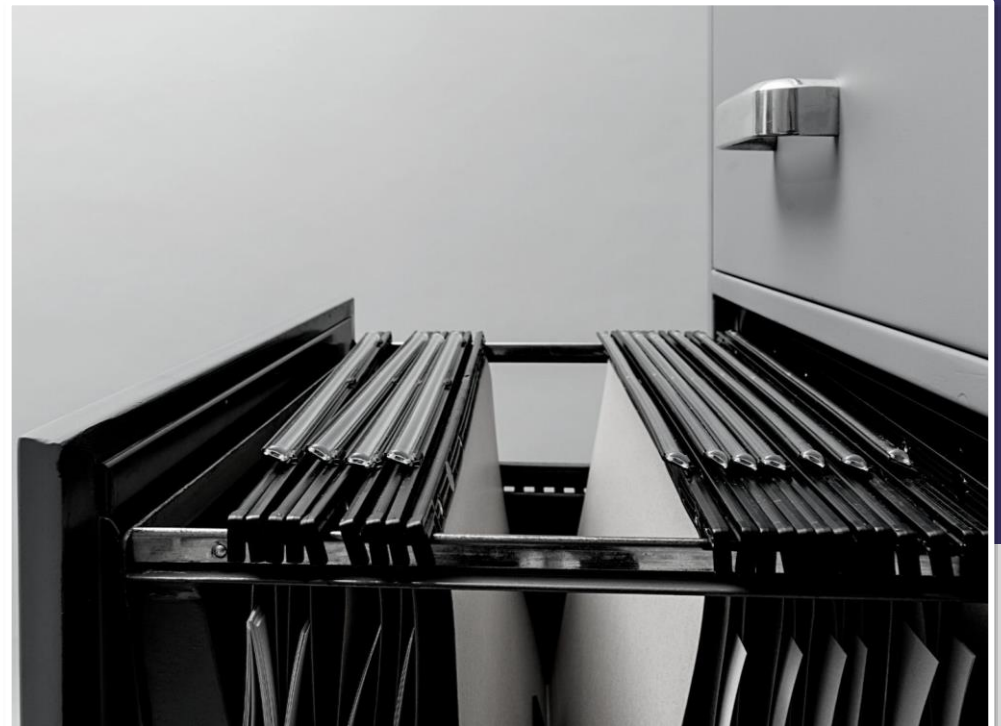
What's inside your files?



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



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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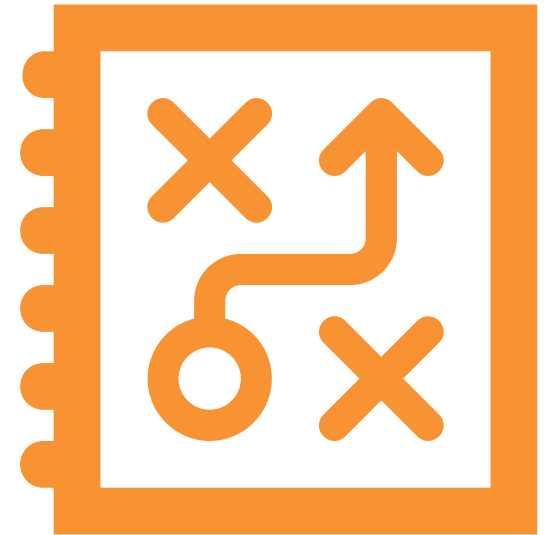
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Training & Assessment Strategies (incl amount of training)

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

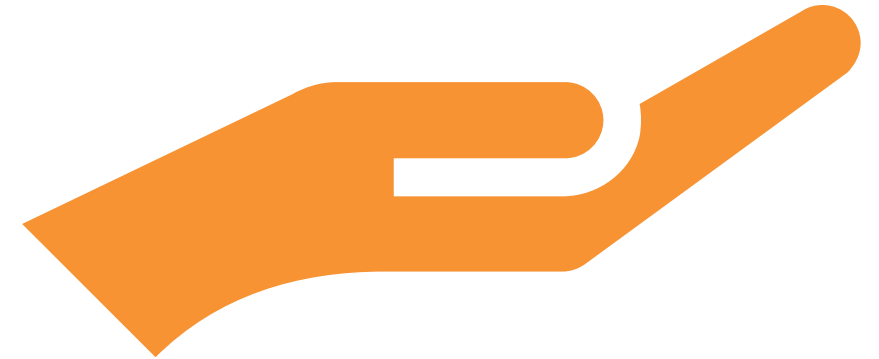
Clause 1.7

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?

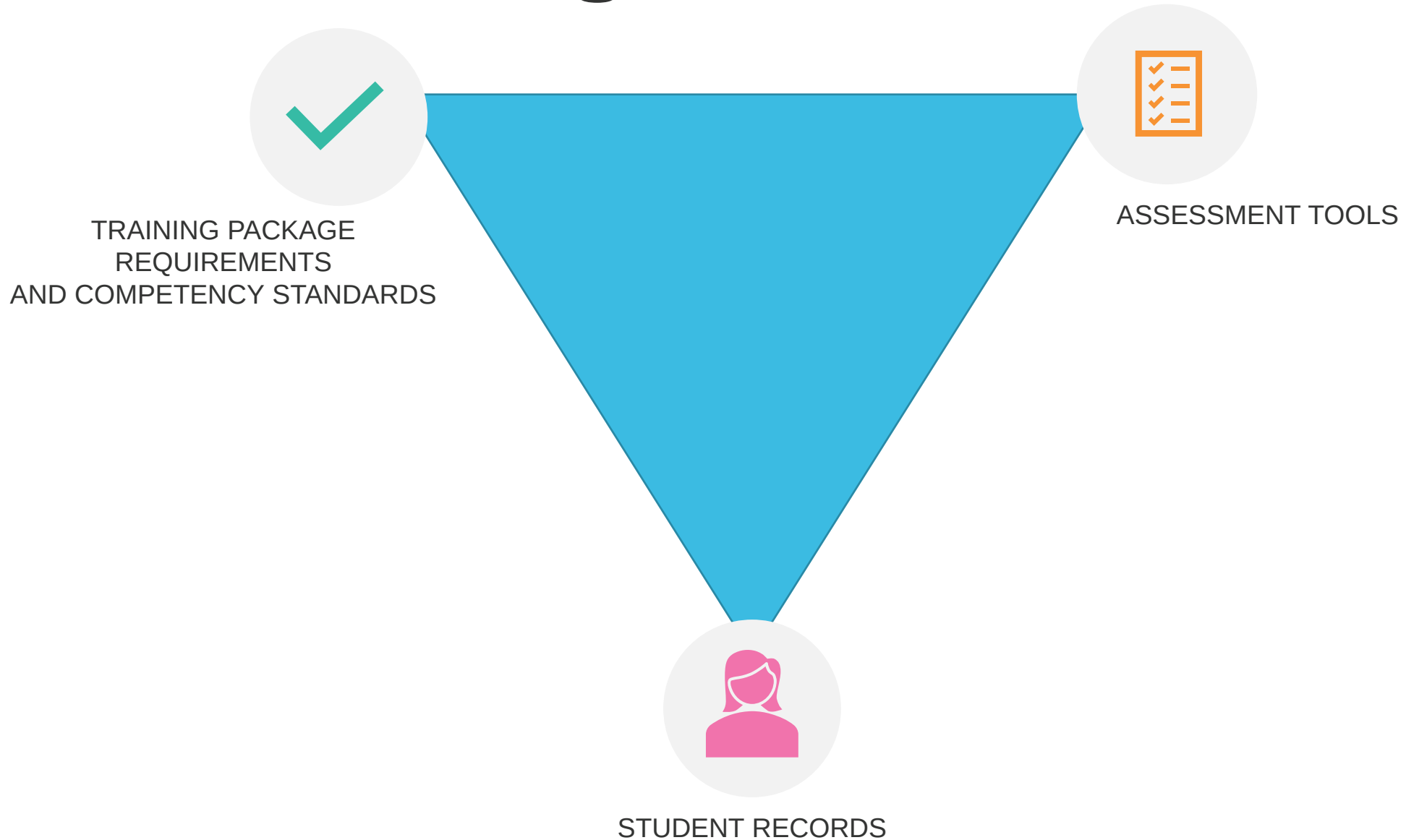
Does the evidence on file demonstrate that the assessments were:

*Fair
Flexible
Valid
Reliable*

*Valid
Sufficient
Authentic
Current*



The audit triangle...assessment



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?*



AQF certification documentation

Clauses 3.1-3.6

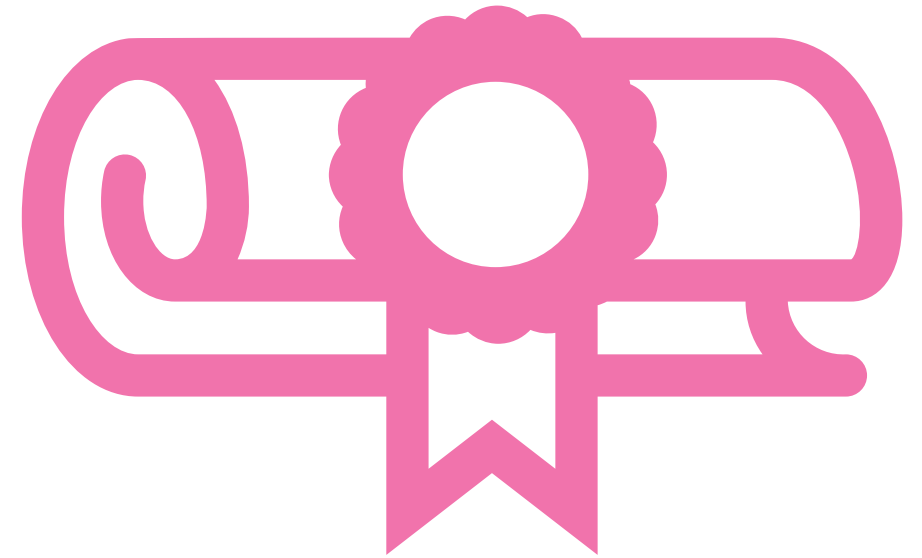
*Have you ensured that the learner has **met all the requirements** of the training product prior to issuing AQF certification documentation?*

*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?*



Learners are informed & protected

Clauses 5.1-5.4

Clause 5.1 – Pre-training review

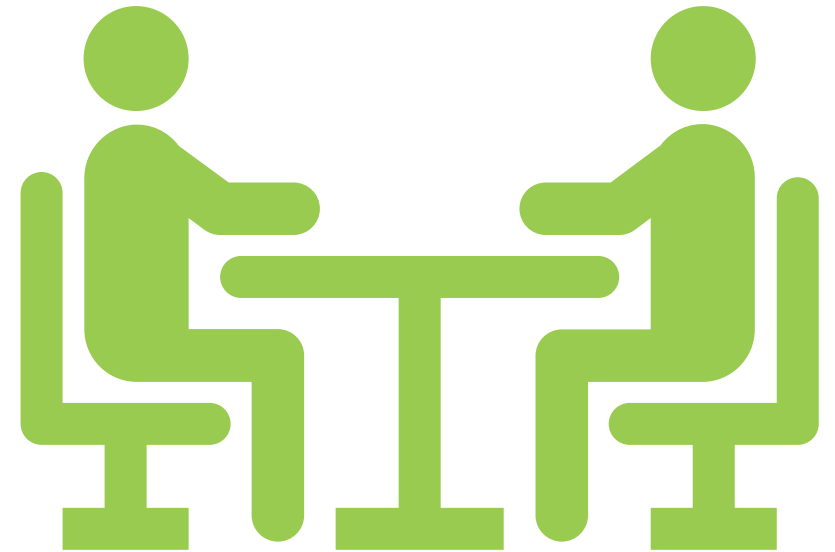
Have you undertaken an assessment of the *existing skills and competencies* of each individual learner?

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?



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**?

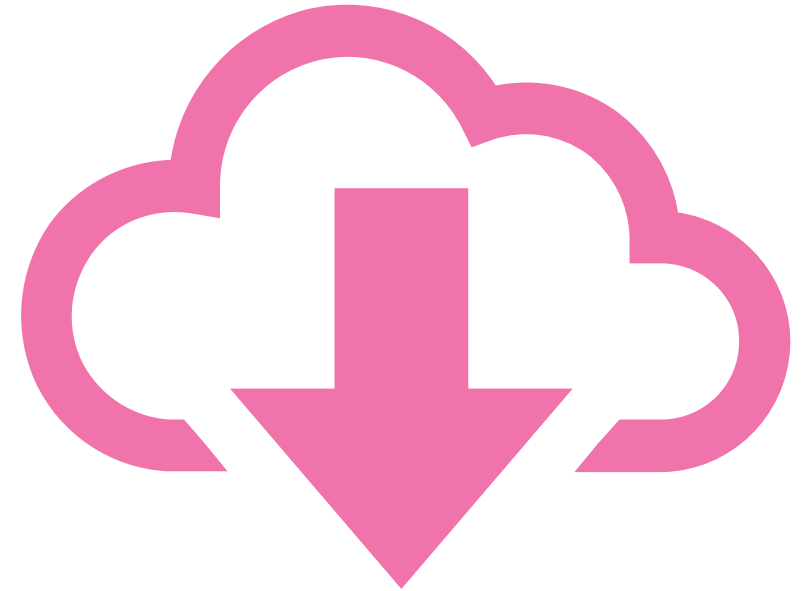


Data Provision Requirements

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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What are auditors looking for?

Compliance with Standards/contract



Process and controls



Good practice

Audit Triangle

CRITERIA

- RTO Standards
- Funding Contracts



RECORDS

- Learner Files
- Transactions

DOCUMENTS

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Audit Triangle



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Something missing ?



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.

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.



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QUALITY ASSURANCE VS QUALITY CONTROL

Quality Assurance

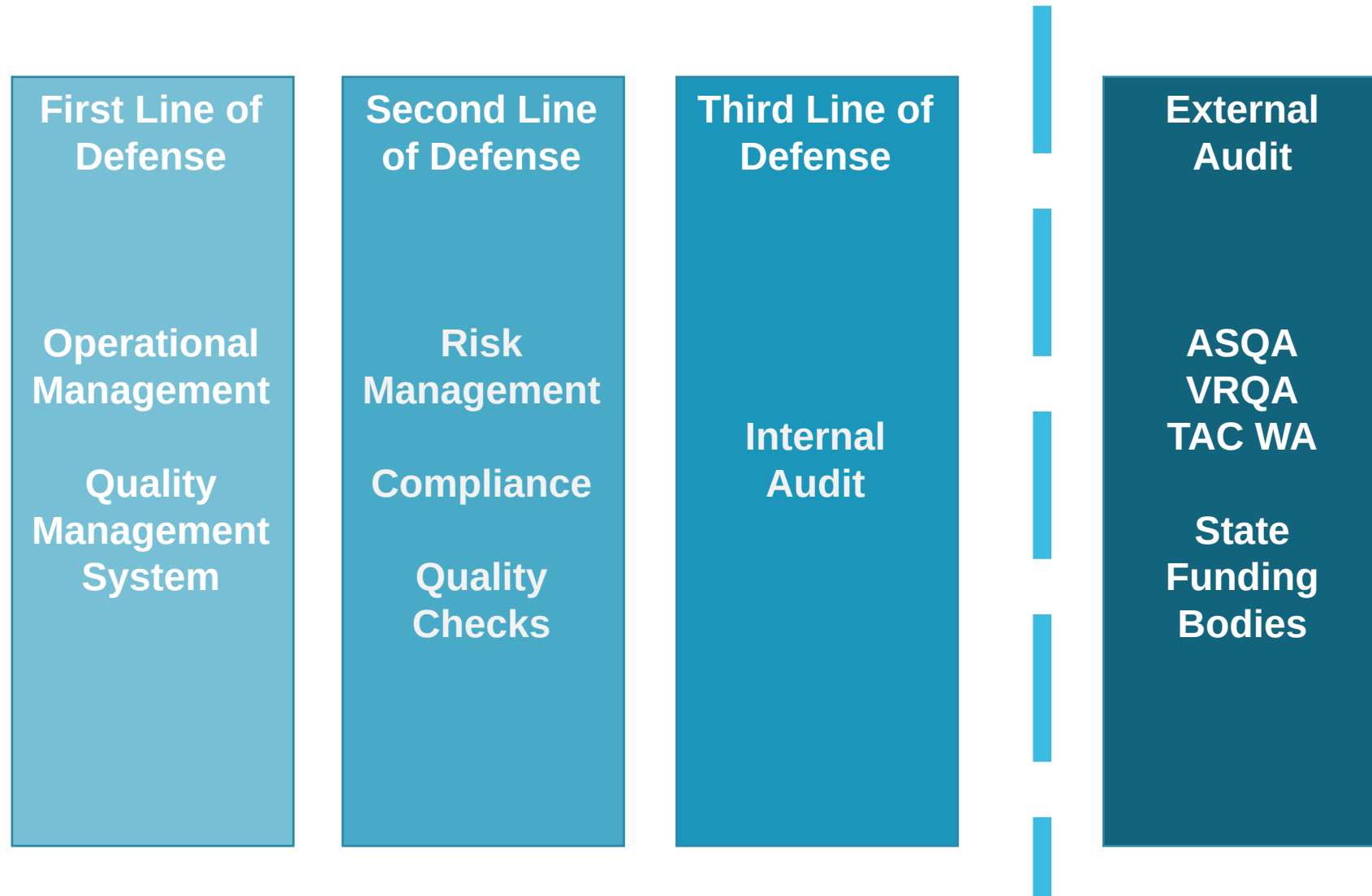
Providing confidence
that the product/service
will fulfil requirements.

Quality Control

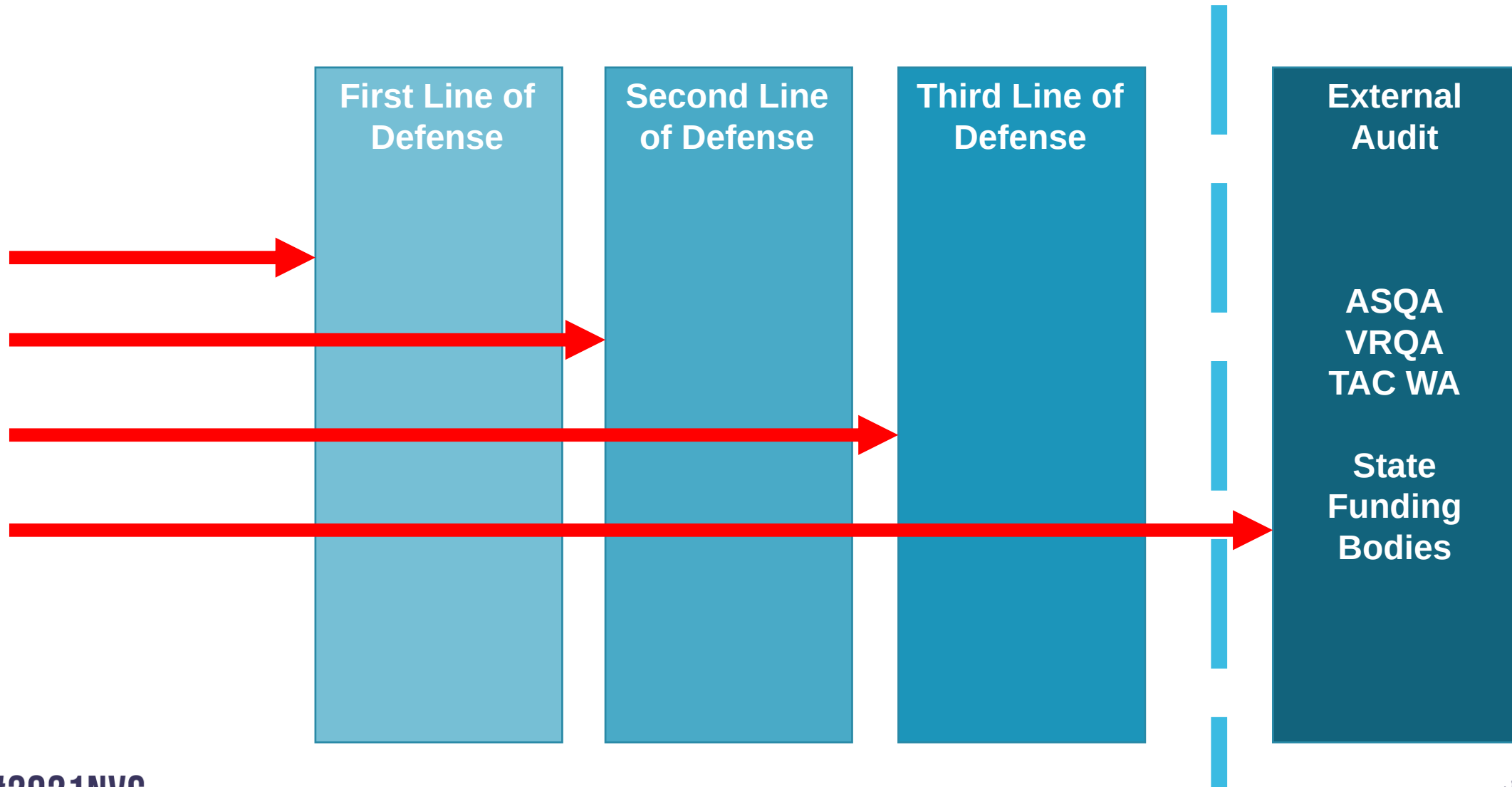
Operational activities
used to fulfil
requirements.



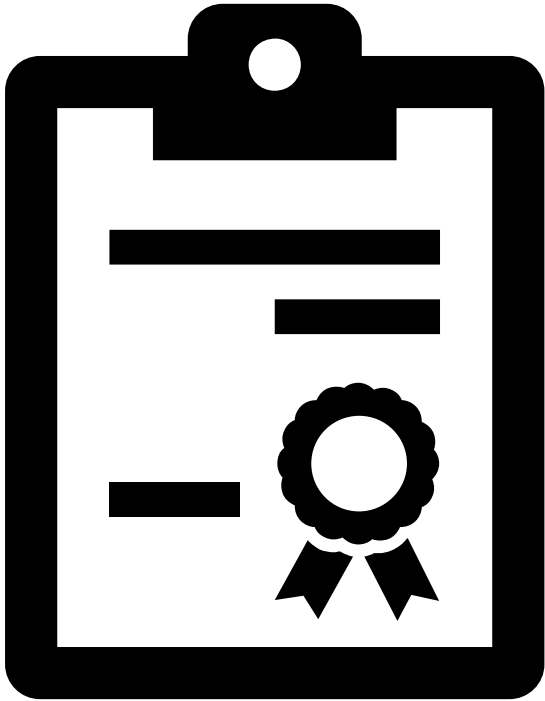
Lines of Defense



Lines of Defense



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.

Implement Quality Assurance Measures



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

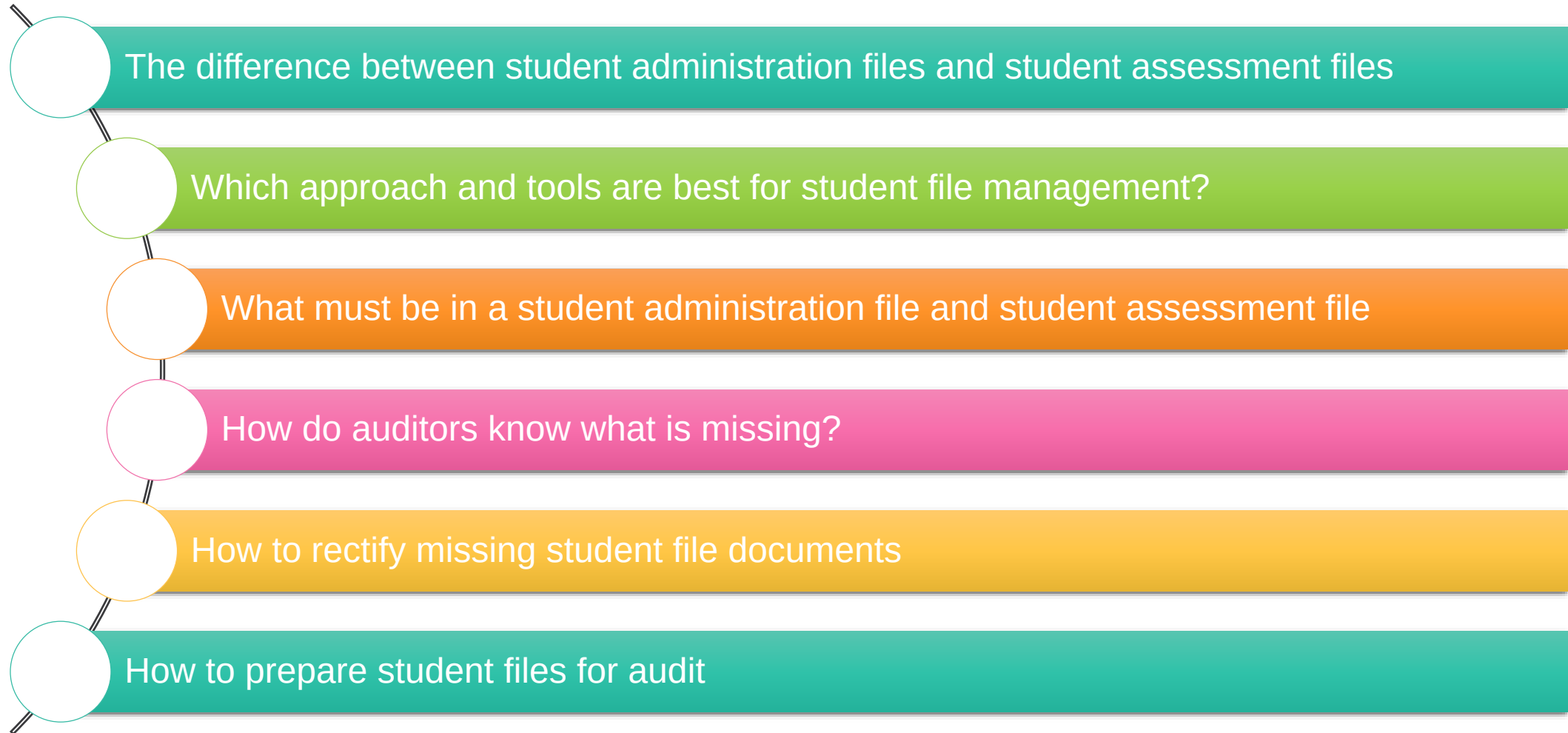
Establish your Internal audit program

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.

WHAT WE HAVE COVERED...





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.

Phone: 1300 73 55 41

Email: kevin@auditexpress.com.au

Website: www.auditexpress.com.au

LinkedIn: www.linkedin.com/in/kevinekendahl/

COMING UP NEXT:

2.00 - 3.00PM



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