



*Skills First Program*  
2018 Audit and Assurance Report

**Business Process Audit**

*Child and Family Care Network Inc.*  
3695

Version	FINAL
Auditor	Protiviti
Date report issued	12 February 2019
Training Provider Contract	2018-19 Standard VET Funding Contract
Circulation	Department of Education and Training Kevin Feeney – Chief Executive Officer Robyn Donaldson – Quality and Risk Manager

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## **1. Executive Summary**

### **1.1 Introduction**

The *Skills First* Program is an entitlement to government subsidised training for eligible individuals.

The Victorian Department of Education and Training (the Department) contracts Training Providers to deliver training to eligible individuals under the *Skills First* Program. In accordance with its *Skills First* Audit and Assurance Strategy, the Department undertakes audits and reviews to ensure the contracted Training Providers are complying with the terms and conditions of their VET Funding Contract (the Contract).

The objectives of the *Skills First* Audit and Assurance Strategy are to:

- confirm that funding has been expended appropriately;
- promote training provider regulatory and standards compliance; and
- promote training provider process quality.

The Department conducts these audits and reviews using contractors from a panel of service providers.

Protiviti conducted the audit fieldwork at the Child and Family Care Network Inc site located at 583 Ferntree Gully Road, Glen Waverley VIC 3150 at 23 January 2019.

### **1.2 Objective and Scope**

The objective of the audit was to assess the business processes and internal control environment employed by the Training Provider to comply with its contractual obligations under the Contract. The audit was conducted based on a sample of data which was extracted from the Skills Victoria Training System (SVTS) by the Department on 21 January 2019.

The scope of work focussed on:

- gaining a contextual understanding of the Training Provider to set the scene for the audit;
- internal audit activity undertaken by the Training Provider to self-assess its compliance against the Contract;
- processes in place for eligibility assessment, fees and fee concessions, pre-training review, training plan development, training participation;
- Gaining a contextual understanding of the provision of quality training services delivered by the Training Provider under *Skills First*, including the Quality Charter;
- student and *Skills First* Teacher interviews to validate audit findings, including verification of funding claimed; and
- maintenance of records to evidence compliance (e.g. eligibility, fee invoices, evidence of fee concession, training plans, evidence of participation), including use of the Training Provider's Student Management System (SMS) and input of relevant data into the SVTS.

Where sample testing issues have been identified, the results have been incorporated into the findings set out in Section 1.4, Section 2 and the Appendices of this report (as relevant).

### **1.3 Business Model and Operating Environment**

Child and Family Care Network Inc 3695 is based in Glen Waverley with campuses across Victoria in Bass Coast, Pakenham and Wyndham with the latter location being added this year. Student records are retained in hard copy at the Glen Waverley site.

The Training Provider currently has approximately 101 of *Skills First* funded students. The primary modes for training delivery are classroom based and practical placements.

Child and Family Care Network Inc has added qualifications to their Registered Scope in the last 12 months, which are the following:

- Certificate III in Individual Support
- Certificate IV in Disability

Trends or changes in Child and Family Care Network Inc's business model over the past five years involved less government funding. The above courses are added to the Training Provider's scope and additional training locations have been added.

Child and Family Care Network Inc employs the following marketing practices word of mouth, social media such as Facebook and Twitter, website, flyers, newspaper, radio and posters in libraries and community centres.

The Training Provider recruits students by providing 'an extended family environment, services that are practical, reliable and responsive to the life issues experienced by families and their children, with an emphasis on early childhood'. The majority of students are recruited through word of mouth.

Brokering Services are not subcontracted out.

Training and assessment services are not sub-contracted out.

Training Services not related to training and assessment (for example, administrative services) are not subcontracted out.

Child and Family Care Network Inc was most recently audited by ASQA in April 2012. It has published the results of this audit on their website, and received a rectification plan as a result of this audit, which has been completed.

Child and Family Care Network Inc has appropriate mechanisms and services for students to have complaints and appeals addressed efficiently and effectively. Students are provided with a copy of the Complaints Policy and Assessment Appeals Policy, which are both also published on the website.

### 1.4 Summary of Findings

The following control weaknesses were identified which may impact the Training Provider’s ability to comply with the Contract:

Report Ref	Area	Control Weakness
2.1	Eligibility	Incorrect provided form of identification as indicated on the eligibility form.
2.2	Training Participation	Testing identified instances that were not in alignment with the requirements of the VET Funding Contract.
2.3	Fees	The reported hourly tuition fee does not match the hourly tuition fee stated on the Statement of Fees.

Further details of the control weakness, and a Management Action Plan to address them, are included in Sections 2 and 3 of this report.

## 1.5 Training Services Observations

### Organisation Level

The following topics and their alignment to contractual requirements were discussed with the Training Provider and/or applicable documents/evidence sighted:

Topic	Discussed	Documented process sighted	Evidence of implementation sighted
	✓	✓	✓
Student attraction activities, including marketing and advertising, in relation to any aspect of this Contract in accordance with Clause 1 of Schedule 1.	✓	✓	✓
Information provided to prospective students about course offerings, fees, support and the impact on the individual's Entitlement to Funded Training in accordance with Clauses 4.1 and 6 of Schedule 1, in addition to collecting and maintaining required evidence.	✓	✓	✓
The conduct of and documented business processes for testing an individual's eligibility for training subsidised through the <i>Skills First</i> Program and any relevant concession or exemption/waiver of tuition fees in accordance with Clauses 2, 3 and 6 of Schedule 1 and the <i>Guidelines about Determining Student Eligibility and Supporting Evidence</i> .	✓	✓	✓*
The conduct of and documented business processes for Pre-Training Reviews, in accordance with Clause 5 of Schedule 1.	✓	✓	✓
The conduct of enrolment processes required including in accordance with Clause 4 of Schedule 1.	✓	✓	✓
The development and documentation of Training Plans in accordance with Clause 7 of Schedule 1.	✓	✓	✓*
Levying of fees, including applying any concessions, exemptions or waivers, including in accordance with Clause 6 of Schedule 1, in addition to collecting and maintaining required evidence.	✓	✓	✓
Reporting and verification of data and other information to the Department including in accordance with Clause 12 of Schedule 1.	✓	✓	✓*
Provision of support to Eligible Individuals.	✓	✓	✓
Strategies for industry engagement and how the outcomes of which are systematically used to ensure the industry relevance of its assessment practices and resources.	✓	✓	✓
Complaints and appeals process.	✓	✓	✓
Staff professional development, including how <i>Skills First</i> Teachers and other relevant staff are made aware of and comply with contractual requirements.	✓	✓	✓
Segregation of Duties.	✓	✓	✓

✓\* Exceptions were identified in some of the BPA student files tested in these areas. Refer to Section 2 (Detailed Findings) for further details.

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The Department issued Internal Audit Checklist (IAC) was last completed in May 2018. No non-compliances were noted in the IAC and a subsequent rectification plan was not developed.

Where a non-compliance is noted in this BPA, the finding has been cross checked against the most recent IAC to ascertain the accuracy in the self-assessment for the relevant control areas. Any discrepancies between the BPA finding and the IAC self-assessment will be noted in the Detailed Findings section of this report.

### **Sampled Program Level**

The program being tested is Certificate III in Education Support. Training is delivered in a classroom-based environment and contains a practical placement for Certificate III in Education Support.

The Training and Assessment Strategy was last updated January 2019. The duration for the program is noted in the Training and Assessment Strategy as total of 615 which equals to 10 months, which does not align to the AQF minimum recommendation of 1200 – 2400 hours equals 1 – 2 years for a qualification at this level. The Training Provider has based their hours on the Purchasing Guide Information which indicates nominal hours of 478 – 608. Child and Family Care Network Inc delivers 615 hours and claim 608 hours, the difference is due to electives that have been selected in partnership with their industry partners.

The units identified in the Training and Assessment Strategy are consistent with those in the Training Plan. This matches the units for which funding has been claimed. These units match the units which have been delivered. The Training and Assessment Strategy identifies the mode/s of delivery. This matches the actual mode/s of delivery.

The information provided to students on the Statement of Fees is consistent with the information in the Training and Assessment Strategy regarding matching units and appropriate hours.

The *Skills First* Teachers delivering Certificate III in Education Support has qualifications as shown in the table below:

<b>Skills First Teacher Name</b>	<b>Qualification/s Held</b>	<b>Date Qualification Obtained</b>	<b>Relevant Industry Experience? Y/N</b>
Adam Palmer	Certificate III in Education Support	18/9/2015	Y
	21648VIC Cert IV in Hypnotherapy	08/2010	
	Bachelor of Arts	16/5/1996	
	TAA40104 Certificate IV in Training and Assessment	24/4/2009	
	TAE40110 Certificate IV in Training and Assessment	22/3/2013	
Debbie Hector	CHC51008 Diploma of Children's Services (Outside School Hours Care)	1/5/2013	Y
	CHC41208 Certificate IV in Children's Services (Outside School Hours Care)	19/4/2012	
	Level IV Certificate in Teaching English to Speakers of Other Languages (CELTA)	03/2006	
	Literacy and Numeracy for Integration Aides and Teacher Aides	1998	

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	Certificate for Teacher Aides-School Services Officers	20/4/1995	
	Advanced course for Integration Aides	30/11/1995	
	TAE40110 Certificate IV in Training and Assessment &	14/8/2014	
	TAELLN411 Address Adult Language, Literacy and Numeracy Skills	4/5/2015	
	BSZ40198 Certificate IV in Assessment and Workplace Training	7/2/2006	
Karina Griffiths	CHC30123 Certificate III in Education Support	20/2/2018	Y
	TAE40116 Certificate IV in Training and Assessment	15/8/2018	
	Disability Standards for Education (Primary Schools) eLearning course	16/12/2018	
	Mandatory Reporting and other Obligations	13/11/2017	
	HLTAID003 Provide First Aid Level 2	18/12/2018	
Jill Douglas	Certificate II in Public Safety (Aquatic Rescue)	8/2/2009	Y
	HLTAID001, HLTAID002, HLTAID003, HLTAID004, HLTAID006)	29/03/2018	
	Train the Trainer First Aid	23/5/2016	
	Train the Trainer Asthma	28/11/2017	
	Train the Trainer Anaphylaxis	28/2/2018	
	Associate Diploma in Business (Legal Practice)	26/2/1990	
	Certificate III and Certificate IV in Fitness	22/8/2011 23/9/2011	
	TAE40110 Certificate IV in Training and Assessment	18/06/2013	
Jay Fleming	HLTAID006 Provide advanced First Aid care	10/2018	Y
	HLTAID007 Provide advanced resuscitation	10/2018	



	PUAEME005A Provide Pain management	09/2018	
	CHC50508 Diploma of Leisure & Health	04/2013	
	Certificate IV in Disability Work	05/2017	
	Diploma of Community Services (Mgt)	05/2016	
	HLTAID001, HLTAID002, HLTAID003 HLTAID004	28/01/2018	
	TAE40110 Certificate IV in Training and Assessment TAELLN411 Address Adult language, literacy and numeracy skills	12/06/2018	

The Register of Trainers and Assessors was viewed and deemed to be current for the training period included in this audit, and included all requirements in accordance with the Contract.

## 1.6 Payment of Fees Observations

As requested by the Department, we reviewed 2 students to determine whether the invoice charged to the student had been paid. Based on our review we have determined the following:

- For 2 students, the student’s fees due date was not provided on the invoice.
- For 1 student, the student had partly paid their fee. There was insufficient evidence to demonstrate that the payment of the fees was due in instalments, the Training Provider was not anticipating the student would not pay the full amount when due. The remainder of the fee was due at the time of audit.
- For 1 student, the student had been invoiced and had paid their fee in full. For this student the following was noted:
  - In 1 instance the amount received by the student was recorded against a *Skills First* funding account in the Training Provider’s finance system.
  - In 1 instance the amount received by the student was able to be traced through to the Training Provider’s bank account as part of a lump sum deposit (either cash or EFT).
- In 2 instances, the Statement of Fees did include all information stipulated in the Guidelines about Fees.

## 1.7 Summary of Student and *Skills First* Teacher Interviews

As requested by the Department, we attempted interviews with a sample of 4 students enrolled in government subsidised training.

- 2 student interviews were completed. The outcome of the completed student interviews is outlined below and is based on information provided by the student only.
  - For 2 students the information obtained from the student interview was consistent with the data reported to SVTS.

As requested by the Department, we attempted interviews with 2 *Skills First* Teachers who deliver training for the Training Provider. The outcome of the two *Skills First* Teacher interviews is outlined below:

- 2 *Skills First* Teacher interviews were completed and no issues were noted.

## 2. Detailed Findings

The table below details the control weaknesses identified and the Training Provider comments on the findings:

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Eligibility</b>								
<p><b>2.1</b> Incorrect provided form of identification as indicated on the eligibility form.</p>	<p>Testing of 2 BPA student files identified one (1) instance where eligibility assessment was completed, the indicated form of identification was not provided. The details are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #cccccc;">Sample number</th> <th style="background-color: #cccccc;">Student ID</th> <th style="background-color: #cccccc;">Finding</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">BPA 2</td> <td style="text-align: center;">03558</td> <td>A copy of Medicare card was provided, however the student's eligibility form stated that an Australian Passport had been provided as evidence only.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this an area of non-compliance when completing their most recent Internal Audit Checklist.</p> <p>Refer to Appendix A for further details.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract, Schedule 1, Clause 2.2</li> </ul>	Sample number	Student ID	Finding	BPA 2	03558	A copy of Medicare card was provided, however the student's eligibility form stated that an Australian Passport had been provided as evidence only.	<p>Administration Officer failed to check the Eligibility Form against the actual evidence provided.</p> <p>BPA2 was not a student file audited in the most recent Internal Audit Checklist as student commenced 30/6/2018, which was after the Internal Audit Checklist conducted in May 2018, signed off by the CEO on the 20/6/2018.</p>
Sample number	Student ID	Finding						
BPA 2	03558	A copy of Medicare card was provided, however the student's eligibility form stated that an Australian Passport had been provided as evidence only.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance									
<b>Training Participation</b>											
<p><b>2.2</b> Testing identified instances that were not in alignment with the requirements of the VET Funding Contract.</p>	<p>Testing of 2 BPA student files identified one (2) instance occurred which were not in alignment with the VET Funding Contract. The details are as follows:</p> <table border="1" data-bbox="409 448 1453 647"> <thead> <tr> <th data-bbox="409 448 551 536">Sample number</th> <th data-bbox="551 448 725 536">Student ID</th> <th data-bbox="725 448 1453 536">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="409 536 551 608">BPA 1</td> <td data-bbox="551 536 725 608">03469</td> <td data-bbox="725 536 1453 608">Evidence of participation for this student was sighted after the in SVTS reported end date, for three of the tested units.</td> </tr> <tr> <td data-bbox="409 608 551 647">BPA 2</td> <td data-bbox="551 608 725 647">03558</td> <td data-bbox="725 608 1453 647">Insufficient evidence for one of the units.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this an area of non-compliance when completing their most recent Internal Audit Checklist.</p> <p>Refer to Appendix B for further details.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract, Schedule 1, Clause 11.3</li> </ul>	Sample number	Student ID	Finding	BPA 1	03469	Evidence of participation for this student was sighted after the in SVTS reported end date, for three of the tested units.	BPA 2	03558	Insufficient evidence for one of the units.	<p>BPA1 student continued attending that last few classes of the course despite having successfully completed all units prior to the course end date.</p> <p>BPA2 student attended a make-up class with another group due to being absent when scheduled with her group. The teacher noted the Cluster of the make-up class on the roll when BPA2 attended, however did not note the unit or unit title as per the Attendance Roll requirement to do so.</p> <p>BPA1 was not a student file selected for audit with the most recent Internal Audit Checklist.</p> <p>BPA2 was not a student file audited in the most recent Internal Audit Checklist as student commenced 30/6/2018 which was after the Internal Audit Checklist conducted in May 2018, signed off by the CEO on the 20/6/2018</p>
Sample number	Student ID	Finding									
BPA 1	03469	Evidence of participation for this student was sighted after the in SVTS reported end date, for three of the tested units.									
BPA 2	03558	Insufficient evidence for one of the units.									

Reference	Control Weakness	Training Provider comments on cause of non-compliance								
<b>Fees</b>										
<p><b>2.3</b> The reported hourly tuition fee does not match the hourly tuition fee stated on the Statement of Fees.</p>	<p>Testing of 2 BPA student files identified two (2) instances where the reported hourly tuition fee did not match the hourly tuition fee as shown on the Statement of Fees. The details are as follows:</p> <table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="background-color: #e0e0e0;">Sample number</th> <th style="background-color: #e0e0e0;">Student ID</th> <th style="background-color: #e0e0e0;">Finding</th> </tr> </thead> <tbody> <tr> <td>BPA 1</td> <td>03469</td> <td rowspan="2">SVTS data reports a higher amount of hourly tuition fee charged to the student than stated on the statement of fees. Statement of fees shows '<i>Tuition Fee Amount Per Hour: \$0.00</i>'</td> </tr> <tr> <td>BPA 2</td> <td>03558</td> </tr> </tbody> </table> <p>The Training Provider did not identify this an area of non-compliance when completing their most recent Internal Audit Checklist.</p> <p>Refer to Appendix C for further details.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract, Schedule 1, Clause 6</li> <li>• 2018-19 Standard VET Funding Contract, Schedule 1, Clause 12.2</li> <li>• Skills First Quality Charter, Principle 3</li> </ul>	Sample number	Student ID	Finding	BPA 1	03469	SVTS data reports a higher amount of hourly tuition fee charged to the student than stated on the statement of fees. Statement of fees shows ' <i>Tuition Fee Amount Per Hour: \$0.00</i> '	BPA 2	03558	<p>The administration officer failed to strike out the Tuition \$ per SCH not relevant to the enrolment for both BPA1 and BPA2 on the Individual Statement of Fees as well as failed to complete the Tuition Fee Amount Per Hour on the Enrolment Statement of Fees.</p> <p>BPA1 was not a student file selected for audit with the most recent Internal Audit Checklist.</p> <p>BPA2 was not a student file audited in the most recent Internal Audit Checklist as student commenced 30/6/2018 which was after the Internal Audit Checklist conducted in May 2018, signed off by the CEO on the 20/6/2018</p>
Sample number	Student ID	Finding								
BPA 1	03469	SVTS data reports a higher amount of hourly tuition fee charged to the student than stated on the statement of fees. Statement of fees shows ' <i>Tuition Fee Amount Per Hour: \$0.00</i> '								
BPA 2	03558									

### 3. Management Action Plan

Ref.	Nature of exceptions identified	Action to correct non-compliance	Responsible Person	Target Completion Date
2.1	<p>EOE evidence noted of eligibility form was not that which was provided.</p> <p>E.g. a Green Medicare Card was provided as evidence however the eligibility form was ticked that an Australian Passport was provided.</p>	<p>The Administration Officer has amended the Eligibility Form (initialling same) to denote the actual evidence provided by the student. – <b>Attachment 1.</b></p> <p>Administration Process – Information Session and Pre-Training Review (Release Date 30/1/2018) has been updated to include verification check by administration that the Eligibility form and evidence match and are correct. – <b>Attachment 2.</b></p> <p>Student File Checklist (Release Date 30/1/2019) has been updated to include verification that the Eligibility Form and the evidence provided is correctly noted. – <b>Attachment 3.</b></p> <p>Student File Internal Audit Template (Release Date 30/1/2019) has been updated to include verification that the Eligibility Form and the evidence provided is correctly noted. – <b>Attachment 4.</b></p> <p>Administration Team attended a workshop on Pre-Training Reviews including completion of documentation and verification that documentation is correct – workshop conducted by the Quality &amp; Risk Manager. – <b>Attachment 5.</b></p>	Administration Officer	30/01/2019
			Quality & Risk Manager	30/01/2019
			Quality & Risk Manager	30/01/2019
			Quality & Risk Manager	30/01/2019
			Quality & Risk Manager	4/02/2019
			Administration Team	
			Quality & Risk Manager	30/01/2019

		A Corrective Action has been documented to address the above issue (CAR 01/2019). – <b>Attachment 6.</b>		
<b>2.2</b>	EOP was sighted after the student had been deemed competent. E.g. the student completed the 1/11/2018 however still attended classes until the 8/11/2018.	Teaching Team reminded via email (5/2/2019) to advise students that they are not required to come to classes after they have been deemed competent. – <b>Attachment 7.</b>	Quality & Risk Manager	<b>05/02/2019</b>
<b>2.2</b>	EOP for a make-up class was sighted however; it noted the Cluster only and not the Unit Code.	<p>The Teacher amended the Attendance Roll (upon return from leave 06/02/2019) to denote the unit code and unit title for make-up classes where the Cluster has been only noted.</p> <p>Teaching Team reminded via email (5/2/2019) to ensure that in instances where students are attending make up classes that the Attendance Roll be noted with the Cluster, Unit Codes and Unit Titles. – <b>Attachment 7.</b></p> <p>The Monthly Attendance Roll and Training Plan Checklist (30/1/2019) to include verification of make up classes to ensure that the Cluster, Unit Codes and Unit Titles has been denoted by the teacher. – <b>Attachment 8.</b></p> <p>The Student Cluster Commencement Monitoring Process (30/1/2019) has been updated to include verification of make up classes to ensure that the Cluster, Unit Codes and Unit Titles are checked by the Administration Team when processing Attendance Rolls. – <b>Attachment 9.</b></p> <p>Administration Team attended a workshop on Pre-Training Reviews including completion of Individual Statement of Fees to ensure that the Tution \$ per SCH has been noted correctly – Workshop conducted by the Quality &amp; Risk Manager. – <b>Attachment 5.</b></p>	<p>Teacher</p> <p>Quality &amp; Risk Manager</p> <p>Quality &amp; Risk Manager</p> <p>Quality &amp; Risk Manager</p> <p>Quality &amp; Risk Manager</p> <p>Quality &amp; Risk Manager Administration Team</p>	<p><b>06/02/2019</b></p> <p><b>05/02/2019</b></p> <p><b>30/01/2019</b></p> <p><b>30/01/2019</b></p> <p><b>04/02/2019</b></p>

		A Corrective Action has been documented to address the above issue (CAR 01/2019). – <b>Attachment 6.</b>	Quality & Risk Manager	<b>30/01/2019</b>
<b>2.3</b>	EOF SVTS data reports a higher amount of hourly tuition fee charged to the student than stated on the Statement of Fees. The Statement of Fees shows Tuition Fee Amount per hour as \$0.00)	The Administration Officer has amended the Individual Statement of Fees (initialling same) to denote the actual Tuition \$ per SCH.	Administration Officer	<b>30/01/2019</b>
		Administration Process – Information Session and Pre-Training Review (Release Date 30/1/2018) has been updated to include verification check by administration that the Statement of Fees has been fully completed including the Tuition \$ per SCH. – <b>Attachment 2.</b>	Quality & Risk Manager	<b>30/01/2019</b>
		Student File Internal Audit Template (Release Date 30/1/2019) has been updated to include verification check by administration that the Statement of Fees has been fully completed including the Tuition \$ per SCH – <b>Attachment 3.</b>	Quality & Risk Manager	<b>30/01/2019</b>
		Individual Statement of Fees Template has been updated (Release Date 30/01/2019) to include tick box for Tuition \$ per SCH. – <b>Attachment 10.</b>	Quality & Risk Manager	<b>04/02/2019</b>
		Administration Team attended a workshop on Pre-Training Reviews including completion of documentation and verification that individual Statement of Fees is completed correctly and fully conducted by the Quality & Risk Manager. – <b>Attachment 5.</b>	Quality & Risk Manager	<b>04/02/2019</b>
		A Corrective Action has been documented to address the above issue (CAR 01/2019). – <b>Attachment 6.</b>		



## 4. Next Steps

As noted in the letter dated 10 January 2019 notifying your organisation of this audit, potential actions that may be taken by the Department following this Business Process Audit include:

- Transactional Compliance Audit, examining a larger sample of student files with a focus on your organisation's compliance with the requirements of current and previous VET Funding Contracts, particularly in relation to eligibility assessment, training plans, fee concessions, training delivery and data reporting (or a targeted audit examining a selection of these controls).
- A Quality Review to analyse qualitative aspects of your organisations training delivery and performance.
- Rectification Review, assessing the extent to which the Management Action Plan arising from the Business Process and/or Transactional Compliance Audits have been implemented by your organisation.
- Monetary penalties may be imposed.
- Further actions as deemed appropriate by the Department.

In addition, in accordance with Clause 11.3(b)(iii) of the Contract, where a Management Action Plan has been developed the Training Provider must advise the Department in writing (including submitting appropriate documentation as determined by the Department) of compliance with and implementation of the auditor's recommendations and/or Management Action Plan within six months of the date of this report.

## Appendix A – Eligibility Exceptions

Sample number	Student ID	Program Name	Program ID	Program Commence-ment Date	Enrolment Date	Date of eligibility assessment	Other information	Training Provider Comments
BPA 2	03558	Diploma of Early Childhood Education and Care	CHC50113	30/06/2018	29/05/2018	29/05/2018	A Medicare card was provided, however the student's eligibility form stated that an Australian Passport had been provided as evidence only.	<p>The Eligibility form was not verified to the evidence being provided.</p> <p>Verification checks have been included in the Student File Checklist and the Student File Internal Audit Checklist to ensure non-recurrence.</p> <p>All administration team members attended a training workshop on Pre-Training Reviews on the 4/2/2018 to ensure that they are fully aware to conduct verification checks of the Eligibility forms against the evidence provided.</p>

## Appendix B – Training Participation Exceptions

Sample number	Student ID	Program Name	Program ID	Subject Name	Subject ID	Activity Start Date	Activity End Date	Date of Evidence sighted	Variation from ASD (days)	Other information	Training Provider Comments
BPA 1	03469	Certificate III in Education Support	CHC30213	Support development of student research skills	CHCEDS015	13/09/2018	1/11/2018	8/11/2018	7	Additional EOP after the AED. Attendance rolls for 8/11/18. 7 days after the AED.	<p>The student was deemed competent on the 1/11 however, elected to continue to attend the last few days of the course with her classmates.</p> <p>An email to all staff was sent 5/2/2018 to ensure the roll is noted accordingly for such instances.</p>
BPA 1	03469	Certificate III in Education Support	CHC30213	Support the development of literacy and oral language skills	CHCEDS005	13/09/2018	1/11/2018	8/11/2018	7	Additional EOP after the AED. Attendance rolls for 8/11/18. 7 days after the AED.	<p>The student was deemed competent on the 1/11 however, elected to continue to attend the last few days of the course with her classmates.</p> <p>An email to all staff was sent 5/2/2018 to ensure the roll is</p>

											noted accordingly for such instances.
BPA 1	03469	Certificate III in Education Support	CHC30213	Support the development of numeracy skills	CHCEDS006	13/09/2018	1/11/2018	8/11/2018	7	Additional EOP after the AED. Attendance rolls for 8/11/18. 7 days after the AED.	<p>The student was deemed competent on the 1/11 however, elected to continue to attend the last few days of the course with her classmates.</p> <p>An email to all staff was sent 5/2/2018 to ensure the roll is noted accordingly for such instances.</p>
BPA 2	03558	Diploma of Early Childhood Education and Care	CHC50113	Use an approved learning framework to guide practice	CHCECE009	15/12/2018	15/03/2019	N/A	N/A	Sufficient EOP could not be provided. Missing unit code on attendance roll and only cluster number provided.	<p>The teacher noted only the Cluster number on the roll for the make-up class.</p> <p>The teacher will be requested to note the unit codes(s) and unit titles(s) on the attendance roll upon return from leave 6/2/2019.</p> <p>The Monthly Attendance Roll and Training Plan Checklist has been updated to ensure</p>

												<p>verification that the roll has been completed correctly.</p> <p>An email reminder was forwarded to all staff on the 5/2/2019 to ensure rolls are correctly completed and noting the unit(s) and unit titles(s) for all make up classes.</p>
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## Appendix C – Fee Concessions Exceptions

Sample number	Student ID	Program Name	Program ID	Reported Hourly Tuition Fee Charged	Actual Hourly Tuition Fee Charged	Other information	Training Provider Comments
BPA 1	03469	Certificate III in Education Support	CHC30213	\$0.00	\$0.11	Tuition Fee Amount Per Hour of \$0 stated on the Statement of Fees, does not match SVTS data of \$0.11 per hour. However, the total amount stated on the statement of fees divided by the total tuition amount does match when manually calculated.	<p>The administration staff failed to complete the Statement of Fees correctly.</p> <p>The Individual Statement of fees has been amended accordingly.</p> <p>The team attended a Pre-Training Review workshop on the 4/2/2018 to reiterate that the Statement of Fees must be completed fully.</p> <p>The Student File Checklist has been updated to ensure verification that the Individual Statement of Fees has been completed in full.</p>
BPA 2	03558	Diploma of Early Childhood Education and Care	CHC50113	\$0.00	\$0.18	Tuition Fee Amount Per Hour of \$0 stated on the Statement of Fees, does not match SVTS data of \$0.18 per hour. However, the total amount stated on the statement of fees divided by the total tuition amount does match when manually calculated.	<p>The administration staff failed to complete the Statement of Fees correctly.</p> <p>The Individual Statement of fees has been amended accordingly.</p> <p>The team attended a Pre-Training Review workshop on the 4/2/2018 to reiterate that the Statement of Fees must be completed fully.</p>

								The Student File Checklist has been updated to ensure verification that the Individual Statement of Fees has been completed in full.
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