

**Audit Date:** 13–16 October 2020

**RTO:** Glenroy Neighbourhood Learning Centre Inc

<b>Applicant Details</b>												
Applicant Name	Glenroy Neighbourhood Learning Centre Inc	TOID	3831									
Address	5B Cromwell St, Glenroy VIC 3046											
		Website	<a href="https://glenroynlc.org.au/">https://glenroynlc.org.au/</a>									
Registration Contact	Karen Fitzsimons, Manager											
Phone Number	03 9304 3910 0434 236 311	Email	<a href="mailto:Manager@glenlink.vic.edu.au">Manager@glenlink.vic.edu.au</a>									
<b>Audit Team</b>												
Audit Firm	Quorum QA Pty Ltd	Auditor/s	Carol Macreadie									
Auditor/s		Other Attendees										
<b>Registering Body Details</b>												
Contact Person	Julie Florence											
Phone Number	9032 1560	Email	<a href="mailto:vet.audit@edumail.vic.gov.au">vet.audit@edumail.vic.gov.au</a>									
<b>Audit Details</b>												
Type of Audit	<b>Re-registration Audit</b>											
Conditions Audited	3, 6, 7, 8, 9											
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, <del>2.4</del> , 2.5, 2.6, 2.7	3.1, 3.2, <del>3.3</del> , 3.4									
2016 VRQA Guidelines Audited	<del>4.3</del>	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8 (If applicable)										
	3.1, 3.2, <del>3.3</del> , 3.4, 3.5	4.1, 4.2, 4.3 to 4.6 (If applicable)										
Audit Date/s	13–16 October 2020											
<b>RTO Background</b>												
<p>Glenroy Neighbourhood Learning Centre (GNLC) started in 1978 and currently operates from a purpose-built Community Services Hub. It is an incorporated association and a not-for-profit organisation committed to working with and for the people in its local area. Through the RTO it delivers accredited language and literacy programs, receiving both Skills First and AMEP funding. As a Neighbourhood House it offers pre-accredited English courses, digital literacy and employment pathways programs, health and wellbeing activities, and occasional childcare. It also runs a VCAL program for disengaged young people.</p> <p>The RTO is just one part of this complex business, with the following student numbers:</p> <table border="1" style="margin-left: auto; margin-right: auto;"> <thead> <tr> <th></th> <th>2019</th> <th>2020</th> </tr> </thead> <tbody> <tr> <td>22483VIC Course in EAL</td> <td>12</td> <td>6</td> </tr> <tr> <td>22484VIC Certificate I in EAL (Access)</td> <td>9</td> <td>12</td> </tr> </tbody> </table>					2019	2020	22483VIC Course in EAL	12	6	22484VIC Certificate I in EAL (Access)	9	12
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22483VIC Course in EAL	12	6										
22484VIC Certificate I in EAL (Access)	9	12										

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22485VIC Certificate II in EAL (Access) 10 10

For the other two Qualifications on scope (22488VIC Certificate II in EAL (Employment) and ICT20115 Certificate II in Information, Digital Media and Technology), only 2 units are delivered from each as the VET component of the VCAL course.

In 2020, GNLC has gone through a turbulent time, with major staff turnover and the identification of significant non-compliances in the RTO operations. The new Manager, appointed in April, has actively addressed these issues with the support of the Committee of Management. In March 2020 the Committee of Management decided not to apply for VRQA reregistration but decided in April to proceed.

The Moreland Council is building a new learning hub and library in Glenroy and has invited GNLC to be part of the project and utilise the training spaces there. Once the RTO is functioning better, GNLC aims to grow student numbers, perhaps adding evening classes and 6-month options, and adding a higher EAL level or employment stream to complete a pathway into vocational training.

**Qualifications/Units Audited<sup>1</sup>**

**QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE**

TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
<b>22484VIC</b>	<b>Certificate I in EAL (Access)</b>	5B Cromwell St, Glenroy
<b>22485VIC</b>	<b>Certificate II in EAL (Access)</b>	5B Cromwell St, Glenroy

**Interviewee(s) – Staff name and position; employer name and position**

Karen Fitzsimons	Manager
Janelle Williams-Hurley	Compliance Officer
Sandya Nugapitiya	Trainer, 22484VIC Certificate I in EAL (Access) and 22485VIC Certificate II in EAL (Access)

**Permanent Delivery Sites –**

Do the RTO's permanent delivery sites match the information provided by the VRQA?

Yes

No

X

If 'No', please provide amended details below

**Third party Arrangements –**

Do the RTO's third-party arrangements match the information provided by the VRQA?

Yes

No

X

If 'No', please provide amended details below:

<sup>1</sup> Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology

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**Audit Summary - AQTF Conditions of Registration**

AQTF Conditions		Compliant	Non-Compliant	Not audited
Place an X in the appropriate column				
1	Governance			X
2	Interactions with the Registering Body			X
3	Compliance with Legislation	X		
4	Insurance			X
5	Financial Management			X
6	Certification and Issuing of Qualifications and Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs	X		
8	Accuracy and Integrity of Marketing		X	
9	Transition to Training Packages/Expiry of Accredited Courses		X	
<b>Summary of Non-Compliance<sup>2</sup></b>				
<p><b>CF.6.1</b> The Qualification and Statement of Attainment templates for 22484VIC and 22485VIC used by the RTO do not meet the Australian Qualifications Framework requirements.</p> <p><b>CF.8.1</b> Most marketing materials are accurate but one webpage is not.</p> <p><b>CF.9.1</b> Learning resources do not accurately identify the currency of the training product to which they relate.</p> <p><b>CF.9.2</b> The RTO's procedure for transitioning from superseded accredited courses does not cover all key steps.</p>				

<sup>2</sup> CF = Condition Finding. Finding references are aligned to the Detailed Findings section of this report.

**Audit Summary - AQTF Standards**

<b>AQTF Standards/Elements</b>	<b>Compliant</b>	<b>Non-Compliant</b>	<b>Not audited</b>
<b>Standard 1</b>			
1.1 – Continuous Improvement Strategy		X	
1.2 – Training and Assessment Strategies		X	
1.3 – Training and Assessment Resources	X		
1.4 – Trainer and Assessor Competency	X		
1.5 – Assessment Strategies		X	
<b>Standard 2</b>			
2.1 – Meeting the Needs of Clients	X		
2.2 – Continuous Improvement of Client Services		X	
2.3 – Provision of Information to Clients	X		
2.4 – Third-Party Engagement in Training and Assessment			X
2.5 – Provision of Support Services to Clients	X		
2.6 – Learner Access to Records of Participation	X		
2.7 – Complaints and Appeals Strategy		X	
<b>Standard 3</b>			
3.1 – Operations Management	X		
3.2 – Continuous Improvement of Operations		X	
3.3 – Third-Party Training and/ or Assessment Services			X
3.4 – Records Management	X		
<b>Summary of Non-Compliance<sup>3</sup></b>			
<p><b>SF.1.1.1</b> In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to training and assessment. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p> <p><b>SF.1.2.1</b> <b>22484VIC Certificate I in EAL (Access)</b> Student enrolments do not meet the Qualification packaging rules.</p>			

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

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**SF.1.2.2**

**22484VIC Certificate I in EAL (Access)**

The description of entry requirements is inconsistent and does not provide accurate guidance to trainers when deciding who to enrol in the Qualification.

**SF.1.2.3**

**22484VIC Certificate I in EAL (Access)**

The training strategy requires a significant amount of non-supervised structured learning activities, with no detail supplied on what these activities are and no rationale for how this strategy is consistent with the needs of this particular learner cohort.

**SF.1.2.4**

**22485VIC Certificate II in EAL (Access)**

The training strategy requires a significant amount of non-supervised structured learning activities, with no detail supplied on what these activities are and no rationale for how this strategy is consistent with the needs of this particular learner cohort.

**SF 1.5.1**

**22485VIC Certificate II in EAL (Access)**

**22484VIC Certificate I in EAL (Access)**

The 2019 assessments viewed do not meet the principles of assessment and the rules of evidence.

**SF 1.5.1**

**22485VIC Certificate II in EAL (Access)**

**22484VIC Certificate I in EAL (Access)**

The 2020 assessment tools in some cases do not produce valid evidence.

**SF.2.2.1**

In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to client services. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.

**SF.2.7.1**

The RTO's complaints and appeals documentation does not include a process of escalation up to the VRQA.

**SF 3.2.1**

In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to management of operations. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.

**Strengths**

The RTO leadership team is fully aware of the non-compliances in its operations and has been actively addressing them since the appointment of the new Manager in April. New staff with relevant expertise have been appointed and they have developed a solid plan for both rectification and continuous improvement. A significant improvement in documentation and processes is already apparent.

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**Audit Summary – 2016 VRQA Guidelines for VET Providers**

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

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4.7 – TAE – Registration requirements			X
<b>5. Annual Declaration of Compliance</b>			
5.1 – Annual Declaration of Compliance			X

**Summary of Non-Compliance<sup>4</sup>**

**GF.4.1.1**

**22484VIC Certificate I in EAL (Access)**

The RTO has not provided a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.

**GF.4.1.2**

**22485VIC Certificate II in EAL (Access)**

The RTO has not provided a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.

**GF.4.1.3**

**22484VIC Certificate I in EAL (Access)**

The RTO's training and assessment strategies and practices did not meet the Qualification packaging rules.

**GF.4.2.1**

**22484VIC Certificate I in EAL (Access)**

The RTO has not provided a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.

**GF.4.2.2**

**22485VIC Certificate II in EAL (Access)**

The RTO has not provided a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.

<sup>4</sup> GF = Guideline Finding. Finding references are aligned to the Detailed Findings section of this report.

**Detailed Findings - AQTF Conditions of Registration**

**CONDITION 1 – Governance**

**Not audited in  
Phase 2 audit**

**CONDITION 2 - Interactions with the Registering Body**

**Not audited in  
Phase 2 audit**

**CONDITION 3 – Compliance with Legislation**

**Compliant**

**Evidence/Documentation Reviewed**

- Staff Handbook and Operating Manual 2020 includes:
  - Organisational chart
  - Extensive list of relevant legislation, with links to some key items and links to relevant GNLC policies and procedures on the internal server
  - A summary of AQTF standards 1–3 with explanation of how they affect a trainer’s practice
  - Clear, detailed information about the complaints and grievances process
  - Clear, detailed information about the roles and responsibilities of staff in the organisation, including teachers
  - Staff Code of Ethical Practice – to be signed by trainer
  - Staff Induction Checklist and Student Induction Checklist templates
  - Templates for a range of other formal procedures including Student File Checklist, Formal Complaint Form, Incident Report form, Child Safety Reporting Form.



- EAL Student Information Booklet 2020 includes:
  - Organisational chart
  - Extensive list of relevant legislation, with specific mention of some key items and how to access relevant GNLC policies and procedures, links to useful websites
  - Clear, sufficiently detailed information about relevant processes, requirements, rights and responsibilities of students, including complaints
  - Student code of conduct to be signed by student.
- 8 x Staff Meeting minutes, monthly 2020 – updates and explanations occur regularly, all information is provided to staff.
- 6 x Manager’s Reports to Committee of Management, monthly 2020. Review of all policies and procedures progressively carried out during the tenure of the new Manager
- 7 x Committee of Management meeting minutes, monthly 2020 – demonstrate that the committee is actively engaged in all aspects of the running of GNLC, including the RTO
- 3 x emails to staff regarding Child Safe Standards and Mandatory Reporting
- Student Orientation/Induction Checklist, to be signed by student
- Staff Induction Checklist, to be signed by trainer – includes items relating to privacy and confidentiality, legislation and GNLC policy, student’s rights and staff responsibilities
- Staff Handbook and Operating Manual 2020 p.24 – Procedure for Orientation/First Day includes: “Student Charter of Rights – distribute and discuss. Students should have already signed at enrolment. However, it is important to review this.”
- Interview with the Manager, Karen Fitzsimons, and the Compliance Officer, Janelle Williams-Hurley – they would inform each other of any changes and updates, table it on the agenda for the next staff meeting, also put a note on the Continuous Improvement Register to check any other actions that might flow out of it.

**CONDITION 4 – Insurance**

**Not audited in  
Phase 2 audit**

**CONDITION 5 – Financial Management**

**Not audited in  
Phase 2 audit**

**CONDITION 6 – Certification & Issuing of Qualifications & Statements of Attainment**

**Non-Compliant**

**Evidence/Documentation Reviewed**

- VETtrak database screen shot showing contract to 01/2021 – AVETMISS compliant SMS
- VETtrak Client Enrolment Report by Qualification for 2019 EAL students printed Mon, 5 Oct 2020
- AVETMISS Procedure
- Enrolment Policy and Procedure
- Award Regulations Policy
- Award Regulations – Qualifications Issuance Procedure
- Award Regulations – Statement of Attainment Procedure
- Certificate templates for 22484VIC and 22485VIC
- Statement of attainment templates for 22484VIC and 22485VIC
- GNLC Register Awards Conferred, GNLC Register Statements of Attainment Conferred – Excel spreadsheets – new in 2020, no entries
- GNLC Register Awards Conferred, GNLC Register Statements of Attainment Conferred – Excel spreadsheets, no entries
- Records Management Policy and Procedure, including Archiving timetable – written in 2019, not reviewed yet. The Compliance Manager confirmed that it does not reflect what actually happens – VETTrak and Razornet have replaced manual backup and storage of data in fireproof safes.

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- Email from a Razornet employee <https://www.razornet.com.au/>. The RTO pays for a service whereby all GNLC servers are automatically backed up incrementally every 3 hours to a Network Attached Storage (NAS). The data is then duplicated on Amazon S3 cloud storage. Razornet also archives all student documents at the end of the year, again stored on the NAS and duplicated to cloud storage.
- Interview with the Compliance Officer, Janelle Williams-Hurley:
  - Before Certificates and SoAs are issued, they are cross-checked by admin staff with VETtrak records and then signed off.
  - Hard copies of Certificates and SoAs are kept in an issuance folder, filed by class group. The RTO used to keep a hard copy record of unique Certificate numbers. Janelle instituted an electronic record for security and archive reasons – easy to filter by student name etc to assist enquirers. They get them printed by a professional printer to limit fraudulent copying.
  - The hard copies of student records are archived on the premises in a locked resources and storage room. Archiving of files is done once a year – Janelle provided a detailed explanation of the annual archiving procedure. The RTO uses 'Shred it Australia' for disposal of files.
  - About half of students are continuing so have a USI already.
- GNLC Enrolment Form 2020, includes USI recording space
- “Additional Information for USI Application – only required if you do not already have a USI” – separate single sheet, includes a link to the privacy statement – new, not used in 2019
- Student File Checklist – requires check that the USI has been provided
- 10 x 2019 student files – none needed RTO assistance to apply for a USI
- 1 x student enrolment where the RTO applied for the USI – compliant

CF.6.1	Finding	Required Rectification(s)
	The Qualification and Statement of Attainment templates for 22484VIC and 22485VIC used by the RTO do not meet the Australian Qualifications Framework requirements.	The RTO must put the correct phrasing on its Qualification and Statement of Attainment templates.

*Evidence*

The templates contain the words “This Certificate/SoA is recognised within the Australian Qualifications Framework and is issued under the authority of Victorian Registration and Qualifications Authority.” The correct phrasing is “The qualification is recognised within the Australian Qualifications Framework”, and this should be on the Certificate template only, not on the SoA template. For a Statement of Attainment there should be no mention of the AQF.

**CONDITION 7 – Recognition of Qualifications Issued by other RTOs**

**Compliant**

**Evidence/Documentation Reviewed**

- Credit-Skills Recognition Procedure – includes RPL
- Enrolment Policy and Procedure – includes informing student about Credit Transfer
- Student Handbook p.15 – information on Credit Transfer
- Pre-Training Review Form – Section 4. Prior Learning and Skills
- Application for Credit Transfer (CT) – new form
- Interview with the Compliance Officer, Janelle Williams-Hurley - No examples of Credit Transfer are listed on VETtrak for 2019. There have been fewer new enrolments in 2020 because of the pandemic.

CONDITION 8 – Accuracy and Integrity of Marketing		Non-Compliant
<b>Evidence/Documentation Reviewed</b>		
<ul style="list-style-type: none"> <li>• Website <a href="https://glenroync.org.au/">https://glenroync.org.au/</a> includes detailed fee statements and an extensive list of policies and procedures</li> <li>• One print-based marketing material – 1-page EAL flyer – in foyer for casual walk-ins to pick up – compliant</li> <li>• Media Release Form – video and photos – part of Enrolment Pack</li> <li>• 2 x signed media permission forms for two of the students in a current webpage photo</li> <li>• Detailed Fee flyers for accredited courses – these are given to students at the time of enrolment. Students sign the back page of the Fee Flyer and this is torn off and retained in the student file.</li> <li>• Marketing checklist</li> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley: <ul style="list-style-type: none"> <li>– As GNLC is a small organisation, there are few marketing or promotional materials. Word of mouth and referral from other students is a significant method of recruitment. They plan to put the flyer in the local library and with local JobActive providers.</li> <li>– All students are invited to sign media release at the point of enrolment. The Pre-Training Review is carried out 1:1 so privacy issues are explained to applicants. If they say no, a sticker is put on the ticksheet /checklist on front of the student file.</li> <li>– Even though students sign this form, if their image is going to be used in marketing, staff go back to the student and re-confirm.</li> </ul> </li> </ul>		
CF.8.1	Finding	Required Rectification(s)
	<p>Most marketing materials are accurate but one webpage is not.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• <a href="https://glenroync.org.au/vocational-education-and-training-vet/">https://glenroync.org.au/vocational-education-and-training-vet/</a> This page has the titles of 4 courses but no course codes. It also shows an incorrect title for ICT10115 Certificate I in Information, Digital Media and Technology.</li> </ul>	<p>The RTO must ensure all marketing materials are accurate.</p>

CONDITION 9 – Transition to Training Packages/Expiry of Accredited Courses		Non-Compliant
<b>Evidence/Documentation Reviewed</b>		
<ul style="list-style-type: none"> <li>• Website <a href="https://glenroynlc.org.au/">https://glenroynlc.org.au/</a> and flyers compliant</li> <li>• Training Product Transition and Teach Out Plan</li> <li>• GNLC Transition Letter – template the RTO uses to inform students who are enrolled in superseded training products of their options.</li> <li>• Staff Handbook and Operating Manual p.11</li> <li>• The Fee Flyers include a statement relating to changes in training products.</li> <li>• 22484VIC – Remote Learning Booklets 1 and 3, Term 2, 2020</li> <li>• 22485VIC – Remote Learning Booklet 2, Term 2, 2020</li> <li>• Assessment resources are compliant</li> <li>• 5 x 2019 enrolment forms for 22485VIC Certificate II in EAL (Access) – students are enrolled in a current Qualification</li> <li>• 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access) – students are enrolled in a current Qualification</li> </ul>		
CF.9.1	Finding	Required Rectification(s)
	<p>Learning resources do not accurately identify the currency of the training product to which they relate.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• Remote Learning Booklets for 22484VIC and 22485VIC do not have a Qualification code on the front, only the Qualification title.</li> </ul>	<p>The RTO must ensure that learning resources accurately identify the currency of the training product to which they relate.</p>

CF.9.2.	Finding	Required Rectification(s)
	<p>The RTO's procedure for transitioning from superseded accredited courses does not cover all key steps.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>The Training Product Transition and Teach Out Plan is detailed and clear, but focusses on teach-out procedures only and does not cover critical steps relating to the transition to a new training product, such as the review of training and assessment resources and the review of trainer/assessor current competence. These tasks are mentioned in the Staff Handbook and Operating Manual p.11.</li> </ul>	<p>The RTO must review its procedure for transitioning from superseded accredited courses so that it covers all key steps.</p>

### Detailed Findings - AQTF Standards

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

**Non-Compliant**

##### Evidence/Documentation Reviewed

- **Summary of finding** – There is limited evidence of continuous improvement of training and assessment until after the change of RTO management in April/May. Effective mechanisms to collect and analyse data about training and assessment and to implement improvements are now in place and beginning to be implemented. However, there has been insufficient time for the RTO to demonstrate full compliance with this Standard as there is not yet evidence of monitoring and reviewing improvements.
- Recruitment and Selection Policy and Procedure 2020
- Continuous Improvement Policy 2020 – thorough in its list of proposed strategies
- Continuous Improvement Register 2020 – spreadsheet with tabs for EAL, VCAL, Management and Governance, OHS and Finance – all containing numerous relevant items, including detailed actions from assessment tool validations, specific and tracked
- 6 x monthly 2020 Manager’s Reports to the Committee of Management – These demonstrate ongoing commitment to continuous improvement relating to the RTO, including:
  - strengthened commitment to Child Safe Standards, including all staff and COM members to attend Child Safe Standards Webinar in July 2020
  - review of all policies and procedures to be progressively carried out; set up a Policy, Risk and Compliance Subcommittee to oversee this
  - new templates for Staff Matrix (competency and currency) and Staff Professional Development Record; increased focus on staff undertaking PD
  - created an improved Continuous Improvement Register
  - new templates for TASs, Curriculum and Assessment Plans
  - new EAL assessments mapped to the ACSF – Student Unit Guides and Assessment Books, Trainer Marking Guides and Assessment Mappings
  - revised templates and procedure for maintaining Attendance Registers as previous practice was inconsistent
  - review and update Staff and Student Handbooks



- templates and instructions for staff to conduct student progress reviews
- documents to support staff regarding strategies and lesson plans during remote delivery
- new Initial Review Assessment Training Kit mapped to the ACSF
- organisation subscription to Victorian Applied Learning Association (VALA)
- Continuous Improvement to be a standing item on Staff Meeting agenda.
- Internal AQTF and VRQA Guidelines Audits Sept 2019 – Carried out by an external contractor; it identified significant and numerous non-compliances
- Continuous Improvement Register 2018–19 – contains only two items resulting from the 2019 internal audit. They relate to RPL documentation and updating of staff handbook responsibilities.
- AQTF Quality Indicator Survey Learner response – July 2020
- GNLC EAL I Evaluation Survey Summary Sem 2 2019 – 13 responses – uses Yes/No statements
- GNLC EAL II Evaluation Survey Summary Sem 2 2019 – 6 responses – uses Yes/No statements
- GNLC Learner Evaluation Survey blank template – uses a 1-5 rating scale
- Student Progress Review form 2020 blank template
- 3 x 2020 midcourse reviews for EAL I students
- Student Progress and Learning Agreement blank template – designed for trainers to record any student issues identified and strategies implemented, including referral, reasonable adjustment or rescheduling of assessment
- Staff Performance Appraisal blank template
- Industry Feedback blank template – New in Sept 2020
- Staff Handbook and Operation Manual pp.30–31 – section highlighting relevant continuous improvement activities that staff are responsible for.
- GNLC EAL Student Handbook 2020 p10 – information about the value of students providing feedback. Also, in p.19 Student Code of Conduct
- See S.1.5 – 22484VIC and 22485VIC Validation plans 2020–2023

- Interview with the Compliance Officer, Janelle Williams-Hurley:
  - She did a staff file audit when she started at the RTO in May and has seen Staff Performance Appraisals in other staff files. However, Sandya is new so she hasn't done one. The template will be reviewed at the end of 2020.
  - A considerable amount of time has been spent in staff meetings discussing with the EAL teachers what industry consultation means for them and how they might fulfill this requirement.

SF.1.1.1	Finding	Required Rectification(s)
	<p>In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to training and assessment. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p> <p><i>Evidence</i> All the evidence above.</p>	<p>The RTO must demonstrate the effective implementation of its new continuous improvement approach to training and assessment, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p>

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

**Non-Compliant**

**Evidence/Documentation Reviewed**

- Learning resources and required equipment are sufficient – see S.1.3
  - 2020 Learning and assessment materials viewed are language appropriate, so accessible to the cohort
  - Trainers and assessor qualifications are compliant – see S.1.4
  - Staff Handbook and Operating Manual 2020 p.23:  
*“Self-Directed Learning /Non supervised structured learning activities: To fulfil the requirements of the course, students will be expected to complete approximately 25% of their course hours through independent learning activities each week. These activities will be linked to the work which they are doing in their classes. The activities will be documented in the Curriculum and Assessment Plans and the Unit/ Cluster Guides. Completion of these activities is a requirement of the course. Teaching teams will work together to ensure the requirements are recorded and tasks are undertaken by the students.”*
  - Manager Report to Committee of Management August 2020 – Includes a detailed overview of the RTO's approach to remote learning.
- 22484VIC Certificate I in EAL (Access)**
- 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access)
  - 22484VIC Training and Assessment Strategy 2020
    - TAS p.2 – The cohort is identified as recently arrived migrants who are beginning their formal learning of English as well as longer term migrants who have not previously had the chance to develop their skills. Many have had little education although may have spent some time in the Australian work force. They will have reading, writing, listening and speaking skills at or below an ACSF 1 level.
    - Delivery approach:
      - Nominal hours = 500
      - Face-to-face delivery = 2 days p.w x 9am-2.30pm (minus 1 hr breaks) = 9 hpw x 39 weeks = 351 hrs = approx. 70% of nominal hours
      - Non-supervised structured learning activities = 149 hrs = approx. 4 hpw x 39 weeks = approx. 30% of nominal hours

- Assessment methods cover the accredited course requirements
- The RTO ensures the TAS is current using a review date box with signoff by the Manager.
- Interview with trainer, Sandya Nugapitiya – Many learners are at ACSF Pre level 1B (below ACSF 1) when they enrol.
- 22484VIC Cluster Guide 2020 – Provided to students. Includes a weekly Delivery and Assessment Schedule (briefer than the CAP) and Assessment Information re the required assessments, which units they relate to and due dates.
- 22484VIC Curriculum and Assessment Plan (CAP) – Shows in a weekly table how the delivery of the Qualification addresses all parts of every unit and when assessment will occur

#### **22485VIC Certificate II in EAL (Access)**

- 22485VIC Training and Assessment Strategy 2020
  - The cohort is identified as recent migrants who have had little formal learning of English as well as longer term migrants who have not previously had the chance to develop their skills. Many have not completed secondary education in their own country, may have spent some years in the Australian work force, may have undertaken an EAL course previously and present with skills still at ACSF level 1.
  - Delivery approach:
    - Nominal hours = 505
    - Face-to-face delivery = 2 days per week x 9am-2.30pm (minus 1 hour breaks) = 9 hours per week x 39 weeks = 351 hours = approx. 70% of nominal hours
    - Non-supervised structured learning activities = 4 hours per week x 39 weeks = 156 hours = approx. 30% of nominal hours
  - TAS p.13 – describes self-directed learning as including “day to day activities such as visiting the local library, talking to people in the community, and watching local television shows. Students will also further develop oral communication skills in authentic settings in the community. Students are encouraged to spend time reading English newspapers and other materials.”
  - Assessment methods cover the accredited course requirements
  - the RTO ensures the TAS is current using a review date box with signoff by the Manager.

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- 22485VIC Cluster Guide 2020 – provided to students. Includes a weekly Delivery and Assessment Schedule (briefer than the CAP) and Assessment Information re the required assessments, which units they relate to and due dates.
- 22485VIC Curriculum and Assessment Plan (CAP)
- Assessment Map
- Interview with Sandya Nugapitiya, trainer in 22484VIC Certificate I in EAL (Access) and 22485VIC Certificate II in EAL (Access) – The amount of time spent on practice out of class depends on the student. If they 'get it', they won't need to practice. If the group as a whole is struggling in the Thursday lesson, she will teach it again on Friday and give homework practice on Friday. She tests the group the following week. After the session she will tutor the weaker students 1:1 on WhatsApp.
- Interview with Karen Fitzsimons, Manager and Janelle Hurley-Williams, Compliance Officer:
  - When they started at GNLC in April and May they discovered that 22484VIC students were enrolled in 9 units instead of 8. Also, in place was a delivery mode that units were delivered in an integrated fashion across the whole year and little or no summative assessment was undertaken until late in the year. All relevant staff had left the organisation and they were unable to ascertain the rationale for these decisions. Their primary aim has been not to disadvantage students so they have decided to complete the year as per the existing delivery model. However, in 2021 students will be enrolled to meet the packaging rules and summative assessment of units will be staged across the year. Skills First are of course only paying for 8 units, but they are still in the process of trying to identify which unit Skills First is not paying for. Students have paid a small RTO tuition fee for all units so the RTO will need to refund some to students.
  - They have discussed increasing the amount of training delivered but again decided not to do it mid-course and mid-lockdown. Also, students signed up at the start of the year to 2 days a week, so it may be difficult to expect more attendance and teachers say student commitment is flagging in lockdown anyway. As well, teachers are beginning to manifest resistance to yet more changes. Their aim, again, was not to disadvantage students. Changing for 2021 will be a cleaner process.
  - Recording of self-directed learning activities is not stipulated anywhere for 2020. They plan to review the Remote Learning Books at the end of 2020 and ask teachers to develop a learning book like them which stipulates what these activities are. Again, they decided it was too difficult to change mid-year, given trainers are dealing with many changes and new demands on their time already.

SF.1.2.1	Finding	Required Rectification(s)
	<b>22484VIC Certificate I in EAL (Access)</b> Student enrolments do not meet the Qualification packaging rules.	The RTO must ensure that student enrolments meet the Qualification packaging rules.

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<p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access) – these show that the students are enrolled in 9 units instead of 8.</li> <li>• Interview with Karen Fitzsimons, Manager and Janelle Hurley-Williams, Compliance Officer (above) – they are aware of this and are actively following it up with Skills First, but the issue is not yet resolved.</li> </ul>		
<b>SF.1.2.2</b>	<b>Finding</b>	<b>Required Rectification(s)</b>
<p><b>22484VIC Certificate I in EAL (Access)</b> The description of entry requirements is inconsistent and does not provide accurate guidance to trainers when deciding who to enrol in the Qualification.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• The TAS p.2 states that the course is designed for learners with skills ACSF at or below ACSF level 1.</li> <li>• The TAS p.4 states that “suitable applicants will be at ACSF level 1”.</li> <li>• However, ACSF 1 is the level required to be achieved at the end of training for many of the units of competency so it would not appear to be an appropriate entry level.</li> </ul>		<p>The RTO must ensure the TAS’s description of entry requirements is consistent and provides accurate guidance to trainers when deciding who to enrol in the Qualification.</p>
<b>SF.1.2.3</b>	<b>Finding</b>	<b>Required Rectification(s)</b>
<p><b>22484VIC Certificate I in EAL (Access)</b> The training strategy requires a significant amount of non-supervised structured learning activities, with no detail supplied on what these activities are and no rationale for how this strategy is consistent with the needs of this particular learner cohort.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may have had little education, and who have reading, writing, listening and speaking skills at or below an ACSF 1 level.</li> </ul>		<p>The RTO must supply detail of required non-supervised structured learning activities and provide a rationale for how this strategy is consistent with the needs of this particular learner cohort.</p>

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<ul style="list-style-type: none"> <li>• The 22484VIC TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> <li>• Neither the TAS nor any other documents specify what these activities are. They are not documented in the Curriculum and Assessment Plans and the Unit/ Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li> <li>• The trainer, Sandya, stated that many learners are at ACSF Pre level 1B (below ACSF 1) when they enrol. At Pre level 1B, the ACSF states that a student is able to work with an expert/mentor where highly structured support and modelling is provided, initiated by the expert/mentor; and follow extremely simple instructions and procedures that may require prompting. At ACSF 1, a student is able to work alongside an expert/mentor where prompting and advice can be provided, and follow simple, structured processes provided by others through modelling or step-by-step instructions.  It is unlikely that such students, with the associated reading and writing skills, could effectively-self-direct for approximately 4 hours per week.</li> </ul>	
<p><b>SF.1.2.4 Finding</b></p>	<p><b>Required Rectification(s)</b></p>
<p><b>22485VIC Certificate II in EAL (Access)</b> The training strategy requires a significant amount of non-supervised structured learning activities, with no detail supplied on what these activities are and no rationale for how this strategy is consistent with the needs of this particular learner cohort.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may not have completed secondary education in their own country, and who may have undertaken an EAL course previously and present with skills still at ACSF level 1.</li> <li>• The TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> </ul>	<p>The RTO must supply detail of required non-supervised structured learning activities and provide a rationale for how this strategy is consistent with the needs of this particular learner cohort.</p>

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| <ul style="list-style-type: none"><li>• TAS p.13 – describes self-directed learning as including: “day to day activities such as visiting the local library, talking to people in the community, and watching local television shows. Students will also further develop oral communication skills in authentic settings in the community. Students are encouraged to spend time reading English newspapers and other materials.” However, these activities constitute incidental practice rather than structured learning activities. Also, students are not provided with a mechanism to record how much time they spend on them to ensure all students consistently spend approximately the prescribed amount of time.</li><li>• No non-supervised structured learning activities are documented in the Curriculum and Assessment Plans and the Unit/ Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li></ul> |  |
|---|--|



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

**Compliant**

**Evidence/Documentation Reviewed**

- Lease Agreement between GNLC and Moreland City Council for 5B Cromwell St Glenroy for 6 years from 22/03/2017.
- Photos of GNLC showing:
  - 4 classrooms, all equipped with data projectors and display boards – 3 with a capacity of 12 students, one larger with a capacity of 18–20.
  - computer lab with 12 terminals and a printer
  - Photocopier accessible to students and staff located in corridor
  - Teacher resources in staff office and resource room – bookshelves including sets of readers and labelled filing cabinets. Staff office has 9 desks.
  - Amenities, including disability toilet – clean and modern
  - Front entrance and glass-fronted reception. The Centre is a modern, brick, purpose-built building.
  - Staff kitchen area – spacious and clean
  - First aid kit located in kitchen, list of emergency wardens
  - Emergency exits and fire hydrants
  - 1 x small room for ill students.

Note: The Manager is unable to provide a Statutory Declaration as Melbourne police stations and JPs are no longer doing this due to COVID-19.

- Timetables for 22484VIC and 22485VIC – evidence of sufficient staffing
- 2020 Cluster Guides for 22485VIC and 22484VIC
- Curriculum and Assessment Plans (CAPs) for 22485VIC and 22484VIC
- EAL 1 – Remote Learning Booklets 1 and 3, Term 2, 2020 – created by trainer.

- EAL 2 – Remote Learning Booklet 2, Term 2, 2020 – created by trainer
- Interview with Interview with Sandya Nugapitiya, trainer: She mainly develops her own materials in order to customise them to the needs of particular groups and individuals, and to draw on current events such as the pandemic. She has not been to the Centre since she started her employment except for four days of 1:1 oral assessment, so has not been able to access the resources there.
- Email from Compliance Officer, Janelle Williams-Hurley – There is a class set of 10 laptops as well as 5 iPads for class/student use.

<p><b>ELEMENT 1.4 – Training and assessment is delivered by trainers and assessors who:</b></p> <ul style="list-style-type: none"> <li>a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and</li> <li>b) have the relevant vocational competencies at least to the level being delivered or assessed, and</li> <li>c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and</li> <li>d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.</li> </ul>	<p><b>Compliant</b></p>
<p><b>Evidence/Documentation Reviewed</b></p>	
<p>Sandya Nugapitia, trainer in 22484VIC Certificate I in EAL (Access), 22485VIC Certificate II in EAL (Access)</p> <ul style="list-style-type: none"> <li>• TAE40116 Certificate IV in Training and Assessment, Victoria University 2020</li> <li>• TAEASS502 <i>Design and develop assessment tools</i>, Victoria University 2019</li> <li>• TAELLN401A <i>Address adult language, literacy and numeracy skills</i>, BRACE 2014</li> <li>• TAE40110 Certificate IV in Training and Assessment, SkillsPlus 2012</li> <li>• Course in Adult Numeracy Teaching, Holmesglen Institute 2002</li> <li>• Graduate Diploma in TESOL, University of Technology Sydney 1998</li> <li>• Master of Education, University of Colombo, Sri Lanka 1995</li> <li>• Post Graduate Diploma in Education (ESL), University of Colombo, Sri Lanka 1992</li> <li>• Post Graduate Diploma in English, University of Peradeniya, Sri Lanka 1986</li> <li>• Bachelor of Arts, University of Kelaniya, Sri Lanka 1982</li> <li>• Resumé, Trainer Assessor Skills Matrix – Evidence of vocational currency</li> <li>• Teacher Professional Development Plan – Evidence that professional development in competency-based training and assessment has occurred</li> <li>• Working with Children check</li> </ul>	

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

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

**Non-Compliant**

**Evidence/Documentation Reviewed**

Summary of findings: Overall the 2020 assessment tools, which were produced in quite a short timeframe, are very much better than the 2019 ones. The texts and tasks are at appropriate language levels, instructions are clearer for students; they provide stronger guidance for assessors and the tasks generally provide valid and sufficient evidence. An improvement process is built-in so further improvements can be made to the tools.

- Assessment for Learning Policy
- Assessment for Learning Procedure
- Credit – Skills Recognition Procedure
- Guidelines for Extension and Special Consideration
- Student Request for Extension or Special Consideration
- Result Amendment Form
- 22484VIC Validation plan 2020–2023 – one unit validated so far – VU22593
- 22485VIC Validation plan 2020–2023 – one unit validated so far – VU22602
- 2020 Validation Record Part A (validation of the tool) for VU22602 – carried out rigorously
- 2020 Continuous Improvement Register, including detailed actions from assessment tool validations
- 2018/2019 Continuous Improvement Register – limited entries
- Supporting Statement supplied by the RTO:

- In mid-2020 all new assessments were mapped as part of a Quality Review. Where it was deemed that not all assessment requirements were addressed in the assessment tool, a Supplementary Assessment was created to address the gaps and enable assessors to collect sufficient evidence to make a judgement of competency. These Supplementary Assessments will be used for 2020 only and the assessment tools themselves will be revised before 2021 delivery.
- RPL is not suitable for the cohort of students who enrol in 22484VIC and 22485VIC so no RPL assessments have been submitted. Students are placed in the appropriate level of class using the ACSF pre-training LLN assessment.
- There have been no applications for Credit Transfer.
- 5-year Validation plans for 22484VIC and 22585VIC were created in 2020. Validation tools were also reviewed and a new tool was created. It consists of 2 parts – Part A (validation of the tool) and Part B (validation of assessment judgements). Part A was conducted in August 2020. Rectifications are listed on the Continuous Improvement Register. Part B is scheduled for December 2020.

#### **22484VIC Certificate I in EAL (Access)**

- 2020 Assessment tools for *VU22595 Read and write short, simple descriptive and narrative texts* and *VU22592 Give and respond to short, simple spoken instructions and information*, including:
  - Student Assessment Booklets 2020 (SAB) – include detailed student instructions, assessment tasks and answer spaces, Assessment Criterion Record Table for individual tasks (record of outcomes), ample room for feedback, a column for re-assessment; and Unit/Cluster Assessment Summary Page
  - Marking Guides 2020 – include clear assessor instructions, assessment tasks, sample answers. Assessment Task Review section has detailed suggestions for improvements. No detailed guidelines for making assessment judgements or Criteria for Satisfactory Performance of the Task (drawing on required skills and knowledge) as in 22485VIC
  - Assessment Maps
  - Supplementary Assessment for *VU22592 2020* – an Observation Checklist relating to items of required skills and knowledge to be observed by the assessor throughout the course
- 5 x completed 2019 student assessments for the selected units. It was not possible to view completed 2020 student assessments for the units selected as assessment has not yet been completed.

### 22485VIC Certificate II in EAL (Access)

- 2020 Assessment tools for VU22602 *Give and respond to simple spoken information and directions* and VU22604 *Read and write simple instructional and informational texts*, including:
  - Student Assessment Booklet 2020 (SAB) – includes detailed student instructions, assessment tasks and answer spaces, Assessment Criterion Record Table for individual tasks (record of outcomes) which draws on performance criteria, critical aspects of assessment and required skills and knowledge, ample room for feedback and a column for re-assessment; and Unit/Cluster Assessment Summary Page
  - Text and sound file for 2 listening tasks
  - Marking Guide 2020 – including clear assessor instructions, assessment tasks, sample answers and other detailed guidelines for making assessment judgements, Criteria for Satisfactory Performance of the Task (drawing on required skills and knowledge), and Assessment Task Review for each task which requests feedback and suggestions for improvement from the trainer.
  - Assessment Map 2020
  - Supplementary Assessment for VU22602 2020 – an Observation Checklist relating to items of required skills and knowledge to be observed by the assessor throughout the course.
- 5 x completed 2019 student assessments for the selected units. It was not possible to view completed 2020 student assessments for the units selected as assessment has not yet been completed.
- Interview with EAL trainer, Sandya Nugapitiya:
  - Sandya started at GNLC in mid-May 2020 so she didn't do the 2019 assessments.
  - She has been very involved in the RTO's continuous improvement activities, including improving assessment tasks, writing the CAPs and carrying out validation of some EAL I units with Janelle
  - Previously the RTO had interpreted the integrated delivery of units to mean no summative assessment was conducted until late in the year. The RTO has identified issues for students with this approach and from next year summative assessments will be spread across the year.
  - She is aware of shortcomings in the assessment tasks and it is an ongoing process she discusses with Janelle. She has created some new EAL II tasks but not yet for EAL I. Some tasks need further improvement, for example, more detail regarding skills and knowledge, range etc.

SF.1.5.1	Finding	Required Rectification(s)
	<p><b>22485VIC Certificate II in EAL (Access)</b> <b>22484VIC Certificate I in EAL (Access)</b></p> <p>The 2019 assessments viewed do not meet the principles of assessment and the rules of evidence.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• The design of two 2019 assessment tasks is not valid – they did not enable the learners to demonstrate the skills and knowledge described in the unit. <ul style="list-style-type: none"> <li>– VU22604 – One assessment task is to write a simple information text on a festival. The trainer’s provided model (Tea festival) is inappropriate for the unit level, using sophisticated vocabulary and sentence structure far above what the students themselves could authentically write. Example – “<i>Chat with Melbourne’s best tea purveyors and blenders and taste their finest brews</i>”. The model itself is based on web material <a href="https://iwce.com.au/events/melbourne-tea-festival/">https://iwce.com.au/events/melbourne-tea-festival/</a> and has elicited similar copy and paste work from the 5 students viewed, which has been accepted by the trainer as authentic and assessed as satisfactory.</li> <li>– VU22602 – The level of the spoken text provided (The Issue) is too high for the unit of competency.</li> </ul> </li> <li>• VU22604 – It is not clear how the assessor distinguished S from NYS performance, given that a level of support and tolerance of error is acceptable in this Qualification.</li> <li>• The evidence retained is sometimes not valid or sufficient: <ul style="list-style-type: none"> <li>– VU22602 – The record of evidence used is not sufficient to demonstrate that students validly demonstrated the skills and knowledge of the unit. <i>Sample attached.</i></li> <li>– VU22604 – Student 7 – For one writing task, no drafts were submitted so the evidence does not meet the requirements of the unit.</li> <li>– VU22592 – 4 out of 5 students had inadequate or no evidence provided</li> </ul> </li> </ul>	<p>The RTO is progressively introducing new assessment tasks and continuously improving them, so no rectification is required beyond maintaining their current approach.</p>

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<ul style="list-style-type: none"> <li>• The assessment documentation is unclear and at times inaccurate:             <ul style="list-style-type: none"> <li>– For all units, there is no summary lists of tasks and individual tasks are not numbered.</li> <li>– VU22604 – The unit title is incorrect on the Unit Assessment Outcome Record, different again on the Student instructions, and different again on the teacher instructions</li> <li>– VU22602 – The unit title is incorrect on the student instruction page, different again on the teacher instruction page, different again on the Unit Assessment Outcome Record and different again on one task page.</li> <li>– Some assessments use S instead of COM.</li> </ul> </li> </ul>	
<p><b>SF.1.5.2 Finding</b></p>	<p><b>Required Rectification(s)</b></p>
<p><b>22485VIC Certificate II in EAL (Access)</b> <b>22484VIC Certificate I in EAL (Access)</b></p> <p>The 2020 assessment tools in some cases do not produce valid evidence</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• VU22604 – Assessment Task Michael Long reading – There are 6 questions. You must answer Q 1 and 2, correctly. For Questions 3, 4, 5, 6 you must answer at least 3 correct i.e. 3/4. But the Assessment map shows that if a student gets Q5 or Q3 wrong, they have not met one of the critical aspects.</li> <li>• VU22592 – Performance Criteria 1.3 is not assessed adequately– the 'smoothie' task elicits few of the quantity-related language items suggested in the Range Statement.</li> </ul>	<p>The RTO must maintain its continuous improvement approach to ensure all assessment tasks are valid and enable learners to demonstrate the skills and knowledge described in the unit.</p>



2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.	Compliant
<b>Evidence/Documentation Reviewed</b>	
<p><b>Summary of finding:</b> The 2019 student files show some evidence of poor practice. However, robust systems are now in place which, if implemented consistently, should be effective in ensuring that student needs are identified and met.</p> <ul style="list-style-type: none"> <li>• 2020 Pre-Training Review Form – clear and detailed. Includes the ACSF outcome record</li> <li>• 2020 Pre-Training Assessment Kit – Student Copy – assesses oral communication, reading, writing and numeracy from ACSF Pre-Level A to ACSF 3 – well-designed</li> <li>• 2020 Pre-Training Review ACSF Outcome</li> <li>• 8 x 2019 LLN assessments in student files</li> <li>• Interview with EAL trainer, Sandya Nugapitiya: She was able to give detailed accounts of the individual support she offers to students with varying needs. She focusses on building relationships with students so they feel comfortable to engage and participate.</li> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley:             <ul style="list-style-type: none"> <li>– a staff member is employed who, as part of her role, offers 1:1 learning support to the AMEP students (new arrivals). GNLC also works closely with Moreland Council and refers students with needs to a range of council services.</li> <li>– class teachers do the Pre-Training Reviews for their own Qualifications, so they know the students before classes start. All student documentation is put in a hard copy file and teachers are encouraged to use it to inform themselves about new students.</li> </ul> </li> <li>• GNLC Enrolment Form</li> <li>• GNLC Agreed Learning whilst student is absent from face-to-face delivery 2020 – this document is used to ensure students are supplied with work during extended absences and to record what is completed.</li> <li>• 22484VIC EAL Individual Training Plans – space to state if learning support or external services are required</li> <li>• Attendance register – used as a means of early identification of problems – Student Handbook p.16</li> <li>• Student Progress Review form</li> <li>• Student Progress and learning agreement – If any issues are identified preventing progress, this is used to record goals, strategies, dates etc</li> </ul>	

- 2 x emails from manager to staff re implementation of mid-course reviews
- GNLC Student Welfare Referral Record 2020 – used to record welfare-related concerns disclosed by a student, and associated actions/supports
- Merri Health Community Referral Poster for Youth in Moreland 2020
- Incident Report Form
- OHS Register 2020 – no entries
- Register of Medical Conditions 2020 – no entries
- Enrolment Policy and Procedure 2020 – outlines 6 stages prior to enrolment:
  1. LLN Assessment and Pre-Training Review (PTR)
  2. Placement or referral into most suitable course
  3. Course information
  4. Explanation of fees
  5. Documentation
  6. Induction – *enrolment at end of this stage*
  7. Orientation
  8. Individual Training Plan (ITP).
- GNLC EAL Student Handbook 2020 p.10–11 – Learning support blurb, Table of useful organisations with websites and contacts
- Discrimination, Harassment and Bullying Prevention Policy and Procedure
- Duty of Care Policy and Procedure
- Student Equity and Social Inclusion Policy

- Examples of poor practice in 2019 student files:
  - EAL II student – A continuing student so no LLN assessment was in the file, but she was assessed at the end of 2018 as ACSF 1 in all skill areas; however, the student was deemed NYC in all units and her demonstrated skill level in the 2019 assessment tasks suggests she was inappropriately placed in the class. Sample writing attached.
  - EAL I student – Pre-Training LLN assessment was ACSF Pre level 1B for reading and writing, Post training assessment scored the student at ACSF 1. However, the student was deemed NYC in the two reading and writing units although they achieved the other 7 units. Records suggest inadequate feedback to assist the student to improve.

2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.		Non-Compliant
<b>Evidence/Documentation Reviewed</b>		
<p><b>Summary of finding</b> – There is limited evidence of continuous improvement of client services until after the change of RTO management in April/May. Effective mechanisms to collect and analyse data and to implement improvements are now in place and beginning to be implemented. However, there has been insufficient time for the RTO to demonstrate full compliance with this Standard as there is not yet evidence of monitoring and reviewing improvements.</p> <ul style="list-style-type: none"> <li>• See Evidence for S.1.1</li> <li>• 6 x monthly 2020 Manager’s Reports to the Committee of Management – These demonstrate ongoing commitment to continuous improvement relating to the RTO</li> <li>• Continuous Improvement Policy and Procedure</li> <li>• Continuous Improvement Register 2020</li> <li>• New student survey template 2020</li> <li>• Industry Feedback template 2020</li> <li>• Recruitment and Selection Policy and Procedure 2020</li> <li>• Staff Performance Appraisal blank template</li> <li>• Staff Handbook and Operation Manual pp.30–31 – section highlighting relevant continuous improvement activities that staff are responsible for</li> <li>• GNLC EAL Student Handbook 2020 p10 – information about the value of students providing feedback</li> <li>• See S.1.5 – 22484VIC and 22485VIC Validation plans 2020–2023</li> </ul>		
SF.2.2.1	Finding	Required Rectification(s)
	<p>In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to client services. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p> <p><i>Evidence</i> – All the evidence above.</p>	<p>The RTO must demonstrate the effective implementation of its new continuous improvement approach to client services, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p>

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

**Compliant**

**Evidence/Documentation Reviewed**

**Summary of finding** – Information provided to students before enrolment is clear, accurate and sufficient for them to make an informed choice

- Website, marketing information – Information accessible online
- GNLC EAL Student Handbook 2020
- 2020 Pre-Training Review Form – clear and detailed
- Detailed Fee flyers for accredited courses – these are given to students during enrolment. Students sign the back page of the Fee Flyer and this is torn off and retained in the student file.
- Enrolment Pack, given to students prior to enrolment – contains Enrolment form, Pre-Training Review form, Skills First Eligibility Form, USI application form, Individual Training Plan, Student Handbook, Media Release Permission Form, Permission for work to be used in moderation sessions, Medical Information Form, Student Internet and Social Media Usage Agreement.
- Interview with the Compliance Officer, Janelle Williams-Hurley: The teachers do student PTR interviews 1:1 and ensure students understand relevant information and are placed in the correct class level.
- Staff Handbook and Operating Manual 2020 p.24, 26 instructs staff clearly on how to conduct Pre-Training review and orientation procedures with students to ensure they are fully informed

<b>2.4 - Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.</b>	<b>Not Audited</b>
<b>2.5 - Learners receive training, assessment and support services that meet their individual needs.</b>	<b>Compliant</b>
<b>Evidence/Documentation Reviewed</b>	
Compliance outcome assessed based upon findings of tests 2.1 and 2.3.	
<b>2.6 - Learners have timely access to current and accurate records of their participation and progress.</b>	<b>Compliant</b>
<b>Evidence/Documentation Reviewed</b>	
<ul style="list-style-type: none"> <li>• GNLC 2020 EAL Student Handbook p.14 – All currently enrolled students can ask to view records at the reception office. They are permitted to view and request a printout of any records in their file. A transcript of results can be issued if requested by the student.</li> <li>• Staff Handbook and Operating Manual 2020 p.25 – student access to records, detailed guidelines on maintenance of accurate learner participation and progress records.</li> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley: The RTO is small so students are comfortable to ask their teacher about any problems or issues. She believes the improved procedures and templates mean records are accurate now.</li> <li>• Attendance Registers, Curriculum and Assessment Plans and Trainer Records – evidence that trainers keep accurate and current participation progress records.</li> </ul>	

<b>2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</b>		<b>Non-Compliant</b>
<b>Evidence/Documentation Reviewed</b>		
<ul style="list-style-type: none"> <li>• GNLC Formal Complaint form</li> <li>• GNLC Formal Complaint Register 2020 – no entries</li> <li>• Student Complaints and Resolution Process – clear, speaks to student in clear plain language, uses a flow chart to clarify.</li> <li>• Student Induction/Orientation Checklist – includes grievance procedures and student code of conduct</li> <li>• GNLC EAL Student Handbook 2020 p.10</li> <li>• Staff Handbook and Operating Manual pp.15-16</li> <li>• Student Complaints and Resolution Policy mentions external mediation</li> <li>• Student Complaints and Resolution Procedure – clear, mentions external mediation</li> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley: <ul style="list-style-type: none"> <li>– There have been no formal student complaints in 2020 and no historical records were found.</li> <li>– Policy is displayed in an accessible format on noticeboards at the Centre as per policy.</li> <li>– They are currently improving the process so students can lodge a complaint through the Contact Us part of the website.</li> </ul> </li> </ul>		
<b>SF.2.7.1</b>	<b>Finding</b>	<b>Required Rectification(s)</b>
	The RTO's complaints and appeals documentation does not include a process of escalation up to the VRQA. <i>Evidence</i>	The RTO must revise its complaints and appeals documentation to include a process of escalation up to the VRQA.

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<ul style="list-style-type: none"> <li>No mention is made of escalation of complaints and appeals to the VRQA in the Student Complaints and Resolution Policy, Procedure and Process, the EAL Student Handbook 2020 or the Staff Handbook and Operating Manual.</li> </ul>	
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**3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.**

**Compliant**

**Evidence/Documentation Reviewed**

- Organisational chart
- 10 x 2019 student files, 5 each for 22484VIC and 22485VIC – containing enrolment documents, Skills First documentation, Pre-Training Review, Individual Training Plan
- Enrolment Policy and Procedure – ensures this vulnerable student cohort understands the terms of the agreement
- Enrolment pack including Fees flyer to be explained to student and signed by them
- Staff Handbook and Operating Manual 2020 p.24, 26 instructs staff clearly on how to conduct Pre-Training review and orientation procedures with students to ensure they are fully informed
- 2020 Cluster Guides for 22485VIC and 22484VIC
- Curriculum and Assessment Plans (CAPs) for 22485VIC and 22484VIC
- Attendance Registers, Curriculum and Assessment Plans and Trainer Records – evidence that trainers keep accurate and current participation progress records
- Increased focus on professional development of staff – see S.1.1 CI Register 2020 and meeting minutes
- Recruitment and Selection Policy and Procedure 2020
- Mid-course review 2020 – instituted to seek feedback from students and enable improvement to individual client service



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

**Non-Compliant**

**Evidence/Documentation Reviewed**

**Summary of finding** – There is limited evidence of continuous improvement of management of operations until after the change of RTO management in April/May. Effective mechanisms to collect and analyse data and to implement improvements are now in place and beginning to be implemented. However, there has been insufficient time for the RTO to demonstrate full compliance with this Standard as there is not yet evidence of monitoring and reviewing improvements.

- See Evidence for S.1.1.
- Organisational chart showing the roles and responsibilities within the organisation.
- 6 x monthly 2020 Manager's Reports to the Committee of Management – These demonstrate ongoing commitment to continuous improvement relating to the RTO
- 8 x Staff Meeting minutes, monthly 2020 – updates and explanations occur regularly, all information is provided to staff
- 7 x Committee of Management meeting minutes, monthly 2020 – demonstrate that the committee is actively engaged in all aspects of the running of GNLC, including the RTO
- Continuous Improvement Policy and Procedure 2020
- Continuous Improvement Register 2020
- New student survey template 2020
- Industry Feedback template 2020
- Recruitment and Selection Policy and Procedure 2020
- Staff Performance Appraisal blank template
- Staff Handbook and Operation Manual pp.30–31 – section highlighting relevant continuous improvement activities that staff are responsible for
- Interview with the Compliance Officer, Janelle Williams-Hurley:
  - She instituted an electronic record of Certificate and SoA issuance for security and archive reasons

- A considerable amount of time has been spent in staff meetings discussing with the EAL teachers what industry consultation means for them and how they might fulfill this requirement.
- See S.1.2 – extensive discussion about how/when to modify the existing delivery strategy.

SF.3.2.1	Finding	Required Rectification(s)
	<p>In a comparatively brief period, the RTO has developed new policies, procedures and templates to support a continuous improvement approach to management of operations. It needs more time to demonstrate their effective implementation, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p> <p><i>Evidence</i> All the evidence above.</p>	<p>The RTO must demonstrate the effective implementation of its new continuous improvement approach to management of operations, including analysis of data collected to identify improvement opportunities and monitoring of implementation.</p>

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

**Not Audited**

3.4 - The RTO manages records to ensure their accuracy and integrity.	Compliant
<b>Evidence/Documentation Reviewed</b>	
<p><b>Summary of findings</b> – The RTO appears to have had poor filing practices until the advent of the new management team in April/May 2020. However, on the whole, the required documentation is present. More systematic procedures have been put in place and staff trained in following them.</p> <ul style="list-style-type: none"> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley: Previous recording and filing systems have been inadequate and the new management team have experienced difficulty locating some records. Also, the high turnover of staff and abrupt departures means they have lost organisational knowledge, for example, they only discovered the 2019 Internal Audit some weeks ago, after they had instituted many improvements.</li> <li>• All new (2020) or reviewed policies and procedures are written in plain English and are fit for purpose. All have a version control box and review date.</li> <li>• Continuous Improvement Register 2020 is being rigorously utilised</li> <li>• VETtrak print out of Student completion data</li> <li>• AVETMISS Procedure</li> <li>• Records Management Policy and Procedure, including Archiving timetable and Version Control Procedure</li> <li>• 10 x 2019 student files, 5 each for 22484VIC and 22485VIC – They contain enrolment documents, Skills First documentation, LLN assessments (unless the student is continuing), Pre-Training Review, Individual Training Plan, Photo consent form, Evidence of participation. Some assessment evidence is incomplete but this reflects on assessment tool design and trainer assessment practices rather than record management practices.</li> <li>• Attendance Registers for 22484VIC and 22485VIC Term 3, 2020 – manually completed.</li> <li>• 22484VIC and 22485VIC Curriculum and Assessment Plans and Trainer Records – evidence that trainers keep accurate and current participation progress records.</li> <li>• Staff Handbook and Operating Manual pp.24 – detailed procedures on staff record-keeping, including student files, enrolment and withdrawal, student attendance registers, outcomes and completions</li> <li>• See C.6. re archiving and backup procedures</li> <li>• Interview with the Compliance Officer, Janelle Williams-Hurley: <ul style="list-style-type: none"> <li>– Before Certificates and SoAs are issued, they are cross-checked with VETtrak records and then signed off.</li> </ul> </li> </ul>	

- The RTO used to keep a hard copy record of unique Certificate numbers. Janelle instituted an electronic record of Certificate and SoA issuance for security and archive reasons. They get them printed by a professional printer to limit fraudulent copying.

**Detailed Findings – 2016 VRQA Guidelines for VET Providers**

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

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

**Not Audited in  
Phase 2 audit**

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

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

**Not audited in  
Phase 2 audit**

**Audit Date:** 13–16 October 2020

**RTO:** Glenroy Neighbourhood Learning Centre Inc

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

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

**Not audited**

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

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

**Not audited in  
Phase 2 audit**

**GUIDELINE 2.1 - An 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.**

- A *third party* means any party that provides services on behalf of the RTO but does not include a party to a contract of employment with the RTO.
- *Services* mean training, assessment, related educational or support services and/or any activities related to the recruitment of prospective students, but does not include student counselling, mediation or ICT support services.

**Not audited**

**GUIDELINE 2.2 – An RTO ensures that any third party delivering services on its behalf is required, under a written agreement, to cooperate with the VRQA:**

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) for the purposes of the conduct of any audit or monitoring of its operations.

**Not audited**

**GUIDELINE 2.3 – An RTO notifies the VRQA of any written agreement entered into under Guideline 2.2 for the delivery of services on its behalf:**

- a) within 30 calendar days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and
- b) within 30 calendar days of the agreement coming to an end.

**Not audited**

**GUIDELINE 2.4 – Information, whether disseminated directly by an RTO or by another party on its behalf, is both accurate and factual, including by:**

- a) clarifying whether a third party is recruiting prospective students for an RTO on its behalf; and
- b) distinguishing 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.

**Not audited**

**GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO provides, in print or through referral to an electronic copy, current and accurate information that:**

- a) enables the student to make informed decisions about undertaking training with the RTO and
- b) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf

**Not audited**

**GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, including in relation to any relevant changes to existing or new third party arrangements or changes in ownership.**

**Not audited**

**GUIDELINE 2.7 - An 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 student of the RTO.

**Not audited**

**GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, made by an RTO or a third party providing services on the RTO's behalf.**

**Not audited**



**Audit Date:** 13–16 October 2020

**RTO:** Glenroy Neighbourhood Learning Centre Inc

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

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

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

**Compliant**

**Evidence/Documentation Reviewed**

Sandya Nugapitia, trainer in 22484VIC Certificate I in EAL (Access), 22485VIC Certificate II in EAL (Access)

- TAE40116 Certificate IV in Training and Assessment, Victoria University 2020
- TAEASS502 *Design and develop assessment tools*, Victoria University 2019
- TAELLN401A *Address adult language, literacy and numeracy skills*, BRACE 2014
- TAE40110 Certificate IV in Training and Assessment, SkillsPlus 2012
- Course in Adult Numeracy Teaching, Holmesglen Institute 2002
- Graduate Diploma in TESOL, University of Technology Sydney 1998
- Master of Education, University of Colombo, Sri Lanka 1995
- Post Graduate Diploma in Education (ESL), University of Colombo, Sri Lanka 1992
- Post Graduate Diploma in English, University of Peradeniya, Sri Lanka 1986
- Bachelor of Arts, University of Kelaniya, Sri Lanka 1982
- Resumé, Trainer Assessor Skills Matrix – Evidence of vocational currency
- Teacher Professional Development Plan – Evidence that professional development in competency-based training and assessment has occurred

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RTO: Glenroy Neighbourhood Learning Centre Inc

<p><b>GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.</b></p>	<p><b>Compliant</b></p>
<p><b>Evidence/Documentation Reviewed</b></p>	
<p>Sandya Nugapitia, trainer in <b>22484VIC Certificate I in EAL (Access), 22485VIC Certificate II in EAL (Access)</b></p> <ul style="list-style-type: none"> <li>• TAE40116 Certificate IV in Training and Assessment, Victoria University 2020</li> <li>• TAEASS502 <i>Design and develop assessment tools</i>, Victoria University 2019</li> <li>• TAELLN401A <i>Address adult language, literacy and numeracy skills</i>, BRACE 2014</li> <li>• TAE40110 Certificate IV in Training and Assessment, SkillsPlus 2012</li> </ul>	

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

**Not audited**

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

**Not audited**

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

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

**Not audited**

<b>GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.</b>		<b>Non-Compliant</b>
<b>Evidence/Documentation Reviewed</b>		
<b>22484VIC Certificate I in EAL (Access)</b>		
<ul style="list-style-type: none"> <li>• 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access)</li> <li>• 22484VIC Training and Assessment Strategy 2020</li> <li>• 22484VIC Cluster Guide 2020</li> <li>• 22484VIC Curriculum and Assessment Plan (CAP)</li> </ul>		
<b>22485VIC Certificate II in EAL (Access)</b>		
<ul style="list-style-type: none"> <li>• 22485VIC Training and Assessment Strategy 2020</li> <li>• 22485VIC Cluster Guide 2020</li> <li>• 22485VIC Curriculum and Assessment Plan (CAP)</li> <li>• Interview with Sandya Nugapitiya, trainer in 22484VIC Certificate I in EAL (Access) and 22485VIC Certificate II in EAL (Access)</li> <li>• See S.1.2 – Interview with Karen Fitzsimons, Manager and Janelle Hurley-Williams, Compliance Officer re the delivery strategy, mis-enrolment of 22484VIC students and discussions about amount of training and self-directed learning activities.</li> </ul>		
<b>GF 4.1.1</b>	<b>Finding</b>	<b>Required Rectification(s)</b>
	<b>22484VIC Certificate I in EAL (Access)</b> The RTO has not provided a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.	The RTO must provide a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.

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<p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may have had little education, and who have reading, writing, listening and speaking skills at or below an ACSF 1 level.</li> <li>• The 22484VIC TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> <li>• Neither the TAS nor any other documents specify what these activities are. They are not documented in the Curriculum and Assessment Plans and the Unit/ Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li> <li>• The trainer, Sandya, stated that many learners are at ACSF Pre level 1B (below ACSF 1) when they enrol. It is unlikely that such students, with the associated reading and writing skills, could effectively-self-direct for approximately 4 hours per week.</li> </ul>	
<b>GF 4.1.2 Finding</b>	<b>Required Rectification(s)</b>
<p><b>22485VIC Certificate II in EAL (Access)</b> The RTO has not provided a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may not have completed secondary education in their own country, and who may have undertaken an EAL course previously and present with skills still at ACSF level 1.</li> <li>• The TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> <li>• TAS p.13 – describes self-directed learning as including: “day to day activities such as visiting the local library, talking to people in the community, and watching local television shows. Students will also further</li> </ul>	<p>The RTO must provide a rationale to show how its training and assessment strategies and practices, including the amount of training provided, enables the cohort of learners to meet the requirements for each unit of competency in which they are enrolled.</p>

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<p>develop oral communication skills in authentic settings in the community. Students are encouraged to spend time reading English newspapers and other materials.” However, these activities constitute incidental practice rather than structured learning activities. Also, students are not provided with a mechanism to record how much time they spend on them to ensure all students consistently spend approximately the prescribed amount of time.</p> <ul style="list-style-type: none"> <li>• No non-supervised structured learning activities are documented in the Curriculum and Assessment Plans and the Unit/Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li> </ul>	
<b>GF 4.1.3 Finding</b>	<b>Required Rectification(s)</b>
<p><b>22484VIC Certificate I in EAL (Access)</b> The RTO’s training and assessment strategies and practices did not meet the Qualification packaging rules.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access) – these show that the students are enrolled in 9 units instead of 8 units.</li> <li>• Interview with Karen Fitzsimons, Manager and Janelle Hurley-Williams, Compliance Officer (above) – they are aware of this and are actively following it up with Skills First.</li> </ul>	<p>The RTO must ensure its training and assessment strategies and practices meet the Qualification packaging rules.</p>

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<p><b>GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:</b></p> <ul style="list-style-type: none"> <li>a) the existing skills, knowledge and the experience of the student;</li> <li>b) the mode of delivery; and</li> <li>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.</li> </ul>		<b>Non-Compliant</b>
<b>Evidence/Documentation Reviewed</b>		
<p><b>22484VIC Certificate I in EAL (Access)</b></p> <ul style="list-style-type: none"> <li>• 5 x 2019 enrolment forms for 22484VIC Certificate I in EAL (Access)</li> <li>• 22484VIC Training and Assessment Strategy 2020</li> <li>• 22484VIC Cluster Guide 2020</li> <li>• 22484VIC Curriculum and Assessment Plan (CAP)</li> </ul> <p><b>22485VIC Certificate II in EAL (Access)</b></p> <ul style="list-style-type: none"> <li>• 22485VIC Training and Assessment Strategy 2020</li> <li>• 22485VIC Cluster Guide 2020</li> <li>• 22485VIC Curriculum and Assessment Plan (CAP)</li> <li>• Interview with Sandya Nugapitiya, trainer, in 22484VIC Certificate I in EAL (Access) and 22485VIC Certificate II in EAL (Access)</li> <li>• See S.1.2 – Interview with Karen Fitzsimons, Manager and Janelle Hurley-Williams, Compliance Officer re the delivery strategy, mis-enrolment of 22484VIC students and discussions about amount of training and self-directed learning activities.</li> </ul>		
<b>GF 4.2.1</b>	<b>Finding</b>	<b>Required Rectification(s)</b>
	<p><b>22484VIC Certificate I in EAL (Access)</b> The RTO has not provided a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.</p>	<p>The RTO must provide a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.</p>

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<p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may have had little education, and who have reading, writing, listening and speaking skills at or below an ACSF 1 level.</li> <li>• The 22484VIC TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> <li>• Neither the TAS nor any other documents specify what these activities are. They are not documented in the Curriculum and Assessment Plans and the Unit/Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li> <li>• The trainer, Sandya, stated that many learners are at ACSF Pre level 1B (below ACSF 1) when they enrol. It is unlikely that such students, with the associated reading and writing skills, could effectively-self-direct for approximately 4 hours per week.</li> </ul>	
<p><b>GF 4.2.2 Finding</b></p>	<p><b>Required Rectification(s)</b></p>
<p><b>22485VIC Certificate II in EAL (Access)</b> The RTO has not provided a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <li>• TAS p.2 – The cohort of students is described as migrants with little formal learning of English, who may not have completed secondary education in their own country, and who may have undertaken an EAL course previously and present with skills still at ACSF level 1.</li> <li>• The TAS shows that approximately 4 hours per week (30% of nominal hours) are allocated to non-supervised structured learning activities.</li> <li>• TAS p.13 – describes self-directed learning as including: “day to day activities such as visiting the local library, talking to people in the community, and watching local television shows. Students will also further develop oral communication skills in authentic settings in the community. Students are encouraged to spend</li> </ul>	<p>The RTO must provide a rationale to show that the amount of training it provides to the learner cohort is determined by consideration of their existing skills, knowledge and experience and the mode of delivery.</p>



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<p>time reading English newspapers and other materials.” However, these activities constitute incidental practice rather than structured learning activities. Also, students are not provided with a mechanism to record how much time they spend on them to ensure all students consistently spend approximately the prescribed amount of time.</p> <ul style="list-style-type: none"> <li>• No non-supervised structured learning activities are documented in the Curriculum and Assessment Plans and the Unit/ Cluster Guides, as described in the Staff Handbook and Operating Manual 2020 p.23.</li> </ul>	
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**GUIDELINE 4.3 - From 1 January 2016, to deliver any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor), an RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in Schedule 2 (and the definitions of independent validation and validation) of these Guidelines.**

**Not audited**

**GUIDELINE 4.4 - From 1 January 2016, to deliver any AQF qualification or skill set from the Training and Education Training Package (or its successor), an RTO ensures that all trainers and assessors delivering the training and assessment hold the training and assessment qualification at least to the level being delivered, or have demonstrated equivalence of competencies.**

**Not audited**

**GUIDELINE 4.5 - From 1 January 2017, to deliver the training and assessment qualification specified in Item 1 of Schedule 1 of these Guidelines, or any assessor skill set from the Training and Education Training Package (or its successor), an RTO ensures all trainers and assessors delivering the training and assessment:**

**Not audited**

- a) hold the qualification specified in Item 5 of Schedule 1 of these Guidelines; or
- b) work under the supervision of a trainer that holds the qualification specified in Item 5 of Schedule 1 of these Guidelines.

**GUIDELINE 4.6 - An RTO ensures that any individual working under supervision holds the qualification specified in Item 1 of Schedule 1 of these Guidelines and does not determine assessment outcomes.**

**Not audited**

**GUIDELINE 4.7 - An application to add any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor) to an RTO's scope of registration has only be granted if an RTO has:**

- a) held registration for at least two years continuously at the time of adding the qualification and/or skill set to scope; and
- b) from 1 January 2016, undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with Guideline 4.3.

**Not audited**

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

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

**Not audited**