

*Skills First Program*  
2020 Audit and Assurance Report

**Business Process and Transactional Compliance Audit**

*Trade Institute of Victoria Pty. Ltd.*  
*21920*

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Auditor	Protiviti
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Circulation	Department of Education and Training John Macdonald, Chief Executive Officer – Trade Institute of Victoria Pty. Ltd. Peter Giannopoulos, Manager Training and Development– Trade Institute of Victoria Pty. Ltd. Narelle Weeks, Compliance and Continuous Improvement– Trade Institute of Victoria Pty. Ltd.

## TABLE OF CONTENTS

<b>1.</b>	<b>EXECUTIVE SUMMARY .....</b>	<b>3</b>
1.1	Introduction.....	3
1.2	Overview of the Training Provider ( <i>as provided by the Training Provider</i> ) .....	3
1.3	Objective and Scope of the Audit.....	5
1.4	Business Model and Operating Environment .....	7
1.5	Summary of Findings .....	9
1.6	Training Services Observations .....	11
1.7	Tuition Fees Observations.....	14
1.8	Summary of Student and <i>Skills First</i> Teacher Interviews .....	14
<b>2.</b>	<b>ROOT CAUSE ANALYSIS – BPA SAMPLED STUDENTS ONLY.....</b>	<b>16</b>
<b>3.</b>	<b>DETAILED FINDINGS.....</b>	<b>17</b>
<b>4.</b>	<b>MANAGEMENT ACTION PLAN .....</b>	<b>38</b>
<b>5.</b>	<b>STATUS OF PRIOR AUDIT FINDINGS .....</b>	<b>42</b>
<b>6.</b>	<b>NEXT STEPS .....</b>	<b>43</b>
	<b>APPENDIX A – ELIGIBILITY EXCEPTIONS .....</b>	<b>44</b>
	<b>APPENDIX B – PTR EXCEPTIONS.....</b>	<b>48</b>
	<b>APPENDIX C – TRAINING PLAN EXCEPTIONS .....</b>	<b>59</b>
	<b>APPENDIX D – TRAINING PARTICIPATION EXCEPTIONS.....</b>	<b>66</b>
	<b>APPENDIX E – FEE CONCESSIONS EXCEPTIONS.....</b>	<b>70</b>
	<b>APPENDIX F – FEE EXCEPTIONS.....</b>	<b>71</b>

# 1. Executive Summary

## 1.1 Introduction

The *Skills First* Program is an entitlement to government subsidised training for Eligible Individuals.

The Victorian Department of Education and Training (the Department) contracts Training Providers to deliver training to Eligible Individuals under the *Skills First* Program. In accordance with its *Skills First* Audit and Review Strategy, the Department undertakes assurance activity to ensure the contracted Training Providers are complying with the terms and conditions of their VET Funding Contract (the Contract).

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

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

This audit report includes exceptions-based reporting and has been produced by an externally contracted panel of audit service providers.

This audit examined a sample of data that had been reported by Trade Institute of Victoria Pty. Ltd. (TIV) to the Skills Victoria Training System (SVTS).

## 1.2 Overview of the Training Provider (*as provided by the Training Provider*)

### Overview / Mission Statement

#### HISTORY

Established in 2007 by members of the construction industry, TIV is dedicated to developing the skills of people already in the construction industry, and those who seek to enter it.

#### VALUES

TIV values teamwork, persistence, initiative, compassion and respectfulness towards one another – students, colleagues and stakeholders alike.

#### ETHOS

Our Ethos comprises:

- Striving to deliver training that exceeds learners' expectations;
- An internal environment that rejoices in cultural diversity;
- Good community citizenship;
- Honesty and transparency in all of our dealings;
- Modelling industry standards of work health safety.

#### TARGET DEMOGRAPHIC

- Men and women aged 17 years and older;
- Who aspire to employment outcomes in;
  - the trades of Bricklaying or Carpentry; and/or
  - careers in low to medium rise residential or commercial construction domains including Building, Estimating and Site Management.

#### FEATURES

- Substantial investments in creating 'second to none' simulated workplace environments for learners including the provision of high quality tools, plant, equipment and materials.

- Outstanding independent student survey results 2016 – 2020
- An abundance of construction 'know how' delivered by quality trainers and assessors.
- A sharply focussed scope of operations;
- Quality, well equipped classroom training facilities at the Williamstown base;
- Leased quality conference facilities in a variety of suburban locations.

### 1.3 Objective and Scope of the Audit

Trade Institute of Victoria Pty. Ltd. was provided with 146 of 146 sample data records on 19 February 2021 at 10:28am.

Protiviti conducted the audit remotely which commenced on 23 February 2021 and concluded on 25 February 2021.

Entry Meeting	Date:	23/02/2021	Time:	09:00am
Trade Institute of Victoria Pty. Ltd. Attendees	1 John Macdonald (Chief Executive Officer), 2 Peter Giannopoulos (Manager Training and Development), 3 Narelle Weeks (Compliance and Continuous Improvement)			
Protiviti Attendees	1 Vince Santoro (Senior Consultant), 2 Loes Wilms (Senior Consultant), 3 Keiran Warnock (Consultant)			

The objective of the audit was to consider the business processes and internal control environment employed by the Training Provider to comply with its contractual obligations under the Contract.

The scope of work was to:

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

The following procedures were performed:

- obtained a sample of program and/or subject enrolments, as reported by the Training Provider via the SVTS, provided by the Department
- held an entry meeting with the Training Provider's CEO or authorised delegate
- obtained documentation/materials from the Training Provider for each student/subject in the sample
- provided the Training Provider with the opportunity to present available documentation/materials for each sample
- identified whether the documentation/materials provided by the Training Provider met the requirements of the Contract, as applicable

- considered the information provided by the Training Provider in identifying the factual findings in this report
- held an Exit Interview with the Training Provider’s CEO or authorised delegate to discuss the findings, develop a Management Action Plan, and provide the Training Provider with the final list of exceptions and
- requested management comments and incorporated these into the final report as appropriate.

Transactional compliance testing was also performed to identify specific areas of non-compliance with the Contract through sample testing of records associated with student eligibility, pre-training review, training plans, training participation, fee concessions and data reporting.

### Conclusion of fieldwork

At the conclusion of the audit fieldwork on 25 February 2021 at 15:00pm, TIV, a Close-Out meeting was held to discuss the possible exceptions and ascertain if further evidence may be available to support the items noted as an exception. The Training Provider was granted 24:00hrs to locate and provide the documents not provided at the time of the fieldwork.

TIV did not produce the documents by the above specified timeframe.

Where sample testing issues and corresponding root causes have been identified, the results have been incorporated into the findings set out in Section 1.5, Section 3 and the Appendices of this report (as relevant).

An assessment of a prior audit’s Management Action Plan was undertaken as part of this audit and the current status is reported in Section 5 of this report.

<b>Close-out Meeting</b>		<b>In Person:</b>	<input type="checkbox"/>	<b>Date:</b>	25/02/2021
		<b>Via Phone:</b>	<input checked="" type="checkbox"/>	<b>Time:</b>	15:00pm
Trade Institute of Victoria Pty. Ltd. Attendees	1 John Macdonald (Chief Executive Officer), 2 Peter Giannopoulos (Manager Training and Development), 3 Narelle Weeks (Compliance and Continuous Improvement)				
Protiviti Attendees	1 Vince Santoro (Senior Consultant)				

## 1.4 Business Model and Operating Environment

Trade Institute of Victoria Pty. Ltd. 21920 is based in Williamstown North with campuses across Victoria in Tullamarine, West Footscray, Doncaster, Dandenong and Bendigo. Student records are retained both electronically and in hard copy. Hard copy records are retained at Williamstown North.

TIV management advised that as of 23 February 2021, they are training approximately 900 of *Skills First* funded students. The primary mode for training delivery is blended learning consisting of face to face, workplace and remote audioconferences.

TIV has added qualifications to their Registered Scope in the last 12 months, as per the table below.

Trends or changes in TIV's business model over the past five years involved consistent government funding; changes to courses on Training Provider's scope, as per the table below; and additional training locations, including Dandenong and Bendigo.

Code	Start date	End date
CPC30611- Certificate III in Painting and Decorating	30-May-12	27-Feb-19
CPC31011- Certificate III in Solid Plastering	30-May-12	27-Feb-19
CPC31211- Certificate III in Wall and Ceiling Lining	30-May-12	27-Feb-19
CPC30111- Certificate III in Bricklaying/Blocklaying	30-May-12	25-Nov-21
CPC40308- Certificate IV in Building and Construction (Estimating)	19-May-11	25-Nov-21
CPC40508- Certificate IV in Building and Construction (Site Management)	19-May-11	25-Nov-21
CPC30211- Certificate III in Carpentry	30-May-12	27-Nov-22
CPC40110- Certificate IV in Building and Construction (Building)	19-May-11	27-Nov-22
CPC50210- Diploma of Building and Construction (Building)	19-May-11	27-Nov-22
CPC30220- Certificate III in Carpentry	27-Nov-20	30-Jun-25
CPC33020- Certificate III in Bricklaying and Blocklaying	27-Nov-20	30-Jun-25
CPC40120- Certificate IV in Building and Construction	27-Nov-20	30-Jun-25
CPC40320- Certificate IV in Building Project Support	27-Nov-20	30-Jun-25
CPC50220- Diploma of Building and Construction (Building)	27-Nov-20	30-Jun-25

TIV employs the following marketing practices direct email, website, radio, social media (Twitter and Facebook), sponsorships.

Most students are recruited through the website and word of mouth.

Brokering Services are subcontracted out.

Training and assessment services are not subcontracted out. Governance arrangements with subcontractors involved in the delivery of training and assessment are reflected in formal agreements. Monitoring of these arrangements is conducted by TIV via formal services agreements.

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

Based on advice from Training Provider management, brokering arrangements are in place with the following parties:

<b>Subcontractor/Third Party/Broker Name</b>	<b>Relationship</b> (Specify Subcontractor/ Third Party/Broker)	<b>Formal Agreement Commencement and End Date</b>	<b>Summary of Subcontractor/Third Party/Broker Inputs</b>
Yo Yo Australia Pty Ltd T/as A & H Education Consultancy	Broker	12 February 2016 – Ongoing	Provide referral services and provide students with TIV course material information.
JR Training Consultants	Broker	16 June 2017 – Ongoing	Provide referral services and provide students with TIV course material information.

TIV was most recently audited by ASQA in August 2014. TIV has published the results of this audit on their website. TIV did not receive a rectification plan as a result of this audit.

## 1.5 Summary of Findings

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

Report Ref	Area	Control Weakness
3.1.1	Eligibility	Evidence of eligibility form was not provided in alignment with the VET Funding Contract
3.1.2	Eligibility	Student Declaration was not completed in alignment with the VET Funding Contract
3.1.3	Eligibility	Incorrect reporting of Eligibility exemption.
3.1.4	Eligibility	Training Provider Declaration was not completed in alignment with the VET Funding Contract
3.1.5	Eligibility	Student does not appear to have been eligible for Skills First Funded training
3.2.1	Pre-Training Review	Pre-Training Review was not dated by the Training Provider delegate
3.2.2	Pre-Training Review	Appropriate learning strategies and materials were not assessed in alignment with the requirements of the VET Funding Contract
3.2.3	Pre-Training Review	Pre-Training Review does not consider individual's writing capabilities
3.2.4	Pre-Training Review	Previous competencies acquired to determine if RPL is applicable was not identified in alignment with the VET Funding Contract
3.2.5	Pre-Training Review	Steps to overcome individual's poor digital capability have not been identified
3.2.6	Pre-Training Review	Pre-Training Review did not document why the program was most suitable for the student in alignment with the requirements of the VET Funding Contract
3.3.1	Training Plan	The Training Plan did not specify the delivery modes to be used for each unit of competency in alignment with the VET Funding Contract
3.3.2	Training Plan	Training Plan does not align with the relevant TAS in accordance with the requirements of the VET Funding Contract
3.3.3	Training Plan	Training Plan data does not align to SVTS data
3.4.1	Training Participation	Valid second point of Evidence of Participation could not be provided in alignment with the VET Funding Contract
3.4.2	Training Participation	Evidence of Participation was sighted prior to the unit activity start date
3.5	Concession	Valid evidence of concession was not retained in student file

Report Ref	Area	Control Weakness
3.6	Fees	Hourly fee on the Statement of Fees does not match amount recorded in SVTS

Further details of the control weakness, and a Management Action Plan to address them, are included in Sections 3 and 4 of this report.

The status of prior audit findings, based on the Management Action Plan developed as a result of BPA/TCA audit of TIV (report dated 30/08/2018), has been assessed and the current implementation status is below:

Report Ref	Area	Current status
5.1.1	Pre-Training Review	In Progress
5.1.2	Pre-Training Review	In Progress
5.2	Training Plan	In Progress
5.3	Training Participation	In Progress

**Status Definitions**

**Completed:** the Training Provider has provided evidence that the Management Action Plan to address this finding has been implemented

**In Progress:** the Training Provider has provided evidence that progress has been made in the implementation of the Management Action Plan to address this finding, but all elements of the Management Action Plan have not been fully implemented, and/or actions may be evident to ascertain rectification occurred, however findings of a similar nature were identified in this audit/review.

**Not started:** the Training Provider has not provided any evidence that they have begun to implement the Management Action Plan.

**Out of Scope:** some key aspects from a Quality Review are out of scope as they are not assessed in a BPA/TCA – these include Assessment Resources, Methods & Timing/Practical Placements/Training Verification

Further details of the status of prior audit findings is included in Section 6 of this report.

## 1.6 Training Services Observations

### Organisation Level

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

Topic	Discussed?	Is there a documented <sup>1</sup> process?	Observations
Student attraction activities, including marketing and advertising, in relation to any aspect of this Contract in accordance with Clause 1 of Schedule 1.	✓	Yes	The Training Provider has a developed Marketing Procedures document which includes specific processes to comply to the VET Funding Contract.
Information provided to prospective students about course offerings, fees, support and the impact on the individual's Entitlement to Funded Training in accordance with Clauses 4.1 and 6 of Schedule 1, in addition to collecting and maintaining required evidence.	✓	Yes	The Training Provider has a developed Enrolment Procedures document which includes student enrolment requirements and processes.
The conduct of and documented business processes for testing an individual's <b>eligibility</b> for training subsidised through the <i>Skills First</i> Program and any relevant concession or exemption/waiver of tuition fees in accordance with Clauses 2, 3 and 6 of Schedule 1 and the <i>Guidelines about Determining Student Eligibility and Supporting Evidence</i> .	✓	Yes	The Training Provider has a developed Enrolment Procedures document which includes Skills First Program Eligibility Procedures and outlines eligibility assessment processes and requirements.
The conduct of and documented business processes for <b>Pre-Training Reviews</b> , in accordance with Clause 5 of Schedule 1.	✓	Yes	The Training Provider has a developed Enrolment Procedures document which includes Pre-Training Review procedures and outlines eligibility assessment processes and requirements.
The conduct of enrolment processes required including in accordance with Clause 4 of Schedule 1.	✓	Yes	The Training Provider has a developed Enrolment Procedures document that covers the enrolment process.
The business process and documentation of <b>Training Plans</b> in accordance with Clause 7 of Schedule 1.	✓	Yes	The Training Provider has a developed Enrolment Procedures document that includes the process and documentation of the Training Plan.
Levying of fees, including applying any concessions, exemptions or waivers, including in accordance with Clause 6 of Schedule 1, in addition to collecting and maintaining required evidence.	✓	Yes	The Training Provider has a developed Enrolment Procedures document which includes Skills First Program course fee subsidies, concessions and waivers details and requirements.
Reporting and verification of data and other information to the Department including in accordance with Clause 12 of Schedule 1.	✓	Yes	The Training Provider has a developed SVTS and AVETMISS Procedure that outlines the data upload and verification processes.
Provision of support to Eligible Individuals.	✓	Yes	The Training Provider has a developed Enrolment Procedures document that includes the process to record individual learning needs identified from the PTR and any potential adjustments to the training program.
Strategies for industry engagement and how the outcomes of which are systematically used to ensure the industry relevance of its assessment practices and resources.	✓	Yes	The Training Provider has documented the Industry Consultation procedures and the

<sup>1</sup> While contractually a documented business process is not required for all topics, it may be deemed an opportunity for improvement. If a documented business process is not in place, observation to include details on how this information is communicated to staff.

			Industry Consultation outcomes are systematically documented.
Complaints and appeals process.	✓	Yes	The Training Provider has developed Complaints and Appeals Procedures and maintains a complaints register.
Staff professional development, including how <i>Skills First</i> Teachers and other relevant staff are made aware of and comply with contractual requirements.	✓	Yes	The Training Provider has a developed Professional Development Policy that outlines the PD process and documenting requirements for their staff.
Segregation of Duties.	✓	Yes	The Training Provider has a developed SVTS and AVETMISS Procedure that outlines the segregation of duties for data upload and verification processes and the Fees and Refunds Procedure covers segregation of duties for fees payable and refunds.
Controls and Systems, in accordance with Clause 4.5 h), for:			
<b>Training Participation</b>	✓	Yes	The Training Provider has a developed SVTS and AVETMISS Procedure that outlines the segregation of duties for data upload and verification processes and the Evidence of Learner Participation process specifies the process for Training Participation evidence.
<b>Fee Concessions</b>	✓	Yes	The Training Provider has a developed SVTS and AVETMISS Procedure that outlines the segregation of duties for data upload and verification processes and the Fees and Refunds Procedure covers segregation of duties for fees payable and refunds.
<b>Fees</b>	✓	Yes	The Training Provider has a developed SVTS and AVETMISS Procedure that outlines the segregation of duties for data upload and verification processes and the Fees and Refunds Procedure covers segregation of duties for fees payable and refunds.

The Department issued Internal Audit Checklist (IAC) was last completed in June 2020. The Training Provider did not attach or embed evidence to support their own assessment of compliance for the relevant contract clause/s. The Training Provider noted no non-compliances. A rectification plan was developed and has been completed.

Where a non-compliance is noted in the BPA, the finding has been cross-checked against the most recent IAC to ascertain the accuracy in the self-assessment for the relevant control area/s. The Training Provider did not identify any non-compliances in the IAC that are relevant to the exceptions identified in this audit. Discrepancies between the BPA finding and the IAC self-assessment will be noted in the Detailed Findings section of this report.

### **Sampled Program**

<b>Name of the Program being tested</b>		Certificate III in Carpentry – Apprenticeship			
<b>Where is the program delivered?</b> e.g. a classroom, simulated warehouse environment etc.		Workplace-based delivery			
<b>No. of and cohort type of the Training and Assessment Strategies (TAS) applicable for the program</b>		Two different TAS's, one for apprentices and one for non-apprentices			
<b>Date TAS last updated</b>		1 November 2020			
<b>Duration of program as noted in TAS</b>		Up to 4 years (18 months for non-apprentice)			
<b>Does the duration align to AQF minimum recommended duration?</b>		The duration aligns to the recommended AQF minimum volume of learning for a Certificate III of 1 – 2 years or 1200 – 2400 hours for non-apprentices, and up to four years for apprentices.			
<b>If no, insert the justification for shorter time period as documented in the TAS (or else, state 'Not documented').</b>		N/A			
<b>In TAS?</b>  <b>Y/N</b>	<b>Subjects</b>	<b>Scheduled hours</b>	<b>Delivery Modes</b>	<b>Assessment Methods</b>	<b>SF Teacher responsible for delivery/assessment</b>
	Y	Y	Y	Y	Y

Referring to the program enrolment of one of the BPA sampled students, alignment between the Training Plan and TAS was not determined. Where misalignment occurred between the Training Plan and TAS, adequate justification was not documented by the Training Provider. Misalignment was noted for assessment methods. Refer to finding 3.3.2 for further details.

The information provided to students on the Statement of Fees is consistent with the information in the TAS.

The *Skills First* Teacher(s) delivering Certificate III in Carpentry has qualifications as shown in the table below:

<b>Skills First Teacher Name</b>	<b>Qualification/s Held</b>	<b>Date Qualification Obtained</b>	<b>Relevant Industry Experience? Y/N</b>
Amy Catterall	TAE40116 Certificate IV in Training and Assessment CPC30211 - Certificate III in Carpentry	19/11/2020 25/03/2019	Y

<i>Skills First</i> Teacher Name	Qualification/s Held	Date Qualification Obtained	Relevant Industry Experience? Y/N
William Spencer	TAE40110 Certificate IV in Training and Assessment CPC30211 - Certificate III in Carpentry	30/05/2012 04/04/2016	Y
Luke Tiernan	TAE40110 Certificate IV in Training and Assessment CPC302110 - Certificate III in Carpentry	26/06/2017 08/07/2015	Y
Martin Trevorah	TAE40110 Certificate IV in Training and Assessment Certificate in Bricklaying – Apprenticeship CPC30211 - Certificate III in Carpentry	06/04/2011 26/11/1975 07/02/2020	Y

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

## 1.7 Tuition Fees Observations

As requested by the Department, we reviewed tuition fees and have determined the following:

- The Training Provider’s website did publish the standard fees for government subsidised training in a prominent place.
- For the two (2) BPA students the following was noted:
  - In 2 instances, the Statement of Fees did include all information stipulated in the Guidelines about Fees.
  - In 1 instance, the Hourly Tuition Fee noted on the Statement of Fees did match the fee reported in SVTS.
  - In 1 instance, the Hourly Tuition Fee noted on the Statement of Fees did not match the fee reported in SVTS.

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

As requested by the Department, we attempted interviews with a sample of 8 students enrolled in government subsidised training.

- 1 student could not be contacted.
- 1 student could not complete the interview due to language barriers.
- 6 student interviews were completed.

The outcome of the completed student interviews is outlined below and is based on information provided by the student only.

- For 2 students the information obtained from the student interview was consistent with the data reported to SVTS.

- For 4 students, inconsistencies were noted across the following aspects: Training Participation and Pre-Training Review.

As requested by the Department, we attempted interviews with 4 *Skills First* Teachers who deliver training for the Training Provider. The outcome of the *Skills First* Teacher interviews is outlined below:

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

Please note, management comments relating to student/Teacher interviews are not required. Interview responses of concern will be raised by the Department in the outcome letter.

## 2. Root Cause Analysis – BPA sampled students only

The below table outlines the number of exceptions from the student files reviewed as part of the BPA, based on the business component root cause of each finding.

	Business Policies	Business Processes	People & Organisation	Management Oversight	Systems & Data
Eligibility	0	0	0	0	0
Pre-Training Review	0	2	0	0	0
Training Plan	0	12	0	0	0
Training Participation	0	0	4	0	0
Fee Concessions	0	0	0	0	0
Fees	0	1	0	0	0
<b>Total Errors</b>	0	15	4	0	0
<b>Root Cause Error Rate<sup>2</sup> %</b>	0.00%	78.95%	21.05%	0.00%	0.00%

The root causes of each instance of non-compliance based on the below descriptions.

Root Cause	Deficiency Description
Business Policies	Business policies and procedural documentation does not include specific guidelines, articulate relevant strategies, authorities, responsibilities or expected standards of conduct.
Business Processes	Business processes, methods and/or templates are non-existent or do not align to the requirements of the Contract
People and Organisation	Staff have not consistently applied their knowledge and experience and/or insufficient training been provided to perform the process in accordance with the Contract requirements.
Management Oversight	Management oversight and internal review processes and controls are inadequate to identify and rectify any non-compliances.
Systems and Data	Information systems do not support compliance with the Contract and/or do not produce accurate data for submission through SVTS.

<sup>2</sup> The Root Cause Error Rate is based on the number of exceptions for each root cause, as a percentage of the total exceptions across all five business components.

### 3. Detailed Findings

The table below details the non-compliances identified and the Training Provider comments on the findings:

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
Eligibility								
<p><b>3.1.1</b> Evidence of eligibility form was not provided in alignment with the VET Funding Contract</p>	<p>Testing of 2 BPA and 40 TCA student files identified one (1) instance where the evidence of eligibility form was not provided. The details are as follows:</p> <table border="1" data-bbox="360 564 1458 735"> <thead> <tr> <th data-bbox="360 564 495 651">Sample Number</th> <th data-bbox="495 564 656 651">Student ID</th> <th data-bbox="656 564 1458 651">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 651 495 735">TCA 32</td> <td data-bbox="495 651 656 735">P190-07481</td> <td data-bbox="656 651 1458 735">Evidence of student eligibility as part of the Skills First Program was not provided. Student's Medicare Card and Enrolment information sighted.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul data-bbox="344 1098 1480 1206" style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 3.3</li> <li>• 2019 Guidelines about Determining Student Eligibility and Supporting Evidence</li> </ul>	Sample Number	Student ID	Finding	TCA 32	P190-07481	Evidence of student eligibility as part of the Skills First Program was not provided. Student's Medicare Card and Enrolment information sighted.	<p>Enrolment information and Medicare was provided in original sample information and again on 25.02.2021 as requested.</p> <p>EoE appears not to have been scanned. This was an administrative error. It is available if required.</p>
Sample Number	Student ID	Finding						
TCA 32	P190-07481	Evidence of student eligibility as part of the Skills First Program was not provided. Student's Medicare Card and Enrolment information sighted.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance														
<b>Eligibility</b>																
<p><b>3.1.2</b> Student Declaration was not completed in alignment with the VET Funding Contract.</p>	<p>Testing of 2 BPA and 40 TCA student files identified five (5) instances where the student declaration was not completed in alignment with the VET Funding Contract, as the program code was not included. The details are as follows:</p> <table border="1" data-bbox="360 443 1458 786"> <thead> <tr> <th>Sample Number</th> <th>Student ID</th> <th>Finding</th> </tr> </thead> <tbody> <tr> <td>TCA 7</td> <td>P144-06754</td> <td rowspan="5">Student Declaration does not include the code of the qualification seeking to enrol in.</td> </tr> <tr> <td>TCA 12</td> <td>P169-07244</td> </tr> <tr> <td>TCA 13</td> <td>P161-07168</td> </tr> <tr> <td>TCA 20</td> <td>PC19-07363</td> </tr> <tr> <td>TCA 23</td> <td>P150-06936</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 3.3</li> <li>2019 Guidelines about Determining Student Eligibility and Supporting Evidence</li> </ul>	Sample Number	Student ID	Finding	TCA 7	P144-06754	Student Declaration does not include the code of the qualification seeking to enrol in.	TCA 12	P169-07244	TCA 13	P161-07168	TCA 20	PC19-07363	TCA 23	P150-06936	<p>Sample 7 - P144-06754 – Enrolled 11/7/19 – Prior to 6 August change in SFP form. Sample 23 - P150-06936 – Enrolled 10/5/19 – Prior to 6 August change in SFP form.</p> <p>The remaining three cases were Administrative errors on behalf of TIV. TIV did not update the requirements from the 2019 Guidelines About Determining Student Eligibility and Supporting Evidence (version 1.0) published 30 October 2018, to the version 2.0 published August 2019.</p> <p>The Internal audit checklist would not have taken this into account as a non-compliance in 2019 as the 2019 audit was completed on 14.06.2019 and the 2020 internal audit was based on the 2020 Guidelines About Determining Student Eligibility and Supporting Evidence v1.0 effective from 1 January 2020.</p>
Sample Number	Student ID	Finding														
TCA 7	P144-06754	Student Declaration does not include the code of the qualification seeking to enrol in.														
TCA 12	P169-07244															
TCA 13	P161-07168															
TCA 20	PC19-07363															
TCA 23	P150-06936															

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Eligibility</b>								
<p><b>3.1.3</b> Incorrect reporting of Eligibility exemption</p>	<p>Testing of 2 BPA and 40 TCA student files identified one (1) instance where the eligibility form recorded that the student was granted an eligibility exemption that was not reflected in SVTS. The details are as follows:</p> <table border="1" data-bbox="360 448 1458 647"> <thead> <tr> <th data-bbox="360 448 495 528">Sample Number</th> <th data-bbox="495 448 656 528">Student ID</th> <th data-bbox="656 448 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 647">TCA 11</td> <td data-bbox="495 528 656 647">P126-06223</td> <td data-bbox="656 528 1458 647">Trainer Declaration granted an eligibility exemption to the student; however this is not recorded in SVTS nor is evidence retained accordingly.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 3.3</li> <li>• 2019 Guidelines about Determining Student Eligibility and Supporting Evidence</li> </ul>	Sample Number	Student ID	Finding	TCA 11	P126-06223	Trainer Declaration granted an eligibility exemption to the student; however this is not recorded in SVTS nor is evidence retained accordingly.	<p>Administrative error on behalf of the TIV staff member. A 'Yes' box was ticked instead of the 'No'.</p> <p>The applicant was not granted an exemption because the applicant was eligible for 2 funded courses at the time of the application being completed.</p>
Sample Number	Student ID	Finding						
TCA 11	P126-06223	Trainer Declaration granted an eligibility exemption to the student; however this is not recorded in SVTS nor is evidence retained accordingly.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance														
Eligibility																
<p><b>3.1.4</b> Training Provider Declaration was not completed in alignment with the VET Funding Contract.</p>	<p>Testing of 2 BPA and 40 TCA student files identified four (4) instances where the Training Provider Declaration was not completed in alignment with the VET Funding Contract, as the declaration does not include the qualification, the program code and/or if exemption is granted. The details are as follows:</p> <table border="1" data-bbox="360 480 1458 818"> <thead> <tr> <th data-bbox="360 480 495 564">Sample Number</th> <th data-bbox="495 480 651 564">Student ID</th> <th data-bbox="651 480 1458 564">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 564 495 616">TCA 12</td> <td data-bbox="495 564 651 616">P169-07244</td> <td data-bbox="651 564 1458 616">The Trainer Declaration does not state if eligibility exemption is granted.</td> </tr> <tr> <td data-bbox="360 616 495 667">TCA 13</td> <td data-bbox="495 616 651 667">P161-07168</td> <td data-bbox="651 616 1458 730" rowspan="2">The Trainer Declaration does not include the code of the qualification in which the student is seeking to enrol, nor does it include if eligibility exemption is granted.</td> </tr> <tr> <td data-bbox="360 667 495 730">TCA 23</td> <td data-bbox="495 667 651 730">P150-06936</td> </tr> <tr> <td data-bbox="360 730 495 818">TCA 30</td> <td data-bbox="495 730 651 818">P142-06634</td> <td data-bbox="651 730 1458 818">Trainer Declaration does not include the qualification the student is seeking to enrol in.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul data-bbox="344 1177 1480 1289" style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 3.3</li> <li>• 2019 Guidelines about Determining Student Eligibility and Supporting Evidence</li> </ul>	Sample Number	Student ID	Finding	TCA 12	P169-07244	The Trainer Declaration does not state if eligibility exemption is granted.	TCA 13	P161-07168	The Trainer Declaration does not include the code of the qualification in which the student is seeking to enrol, nor does it include if eligibility exemption is granted.	TCA 23	P150-06936	TCA 30	P142-06634	Trainer Declaration does not include the qualification the student is seeking to enrol in.	<p>Administrative errors on behalf of the TIV staff member/s.</p>
Sample Number	Student ID	Finding														
TCA 12	P169-07244	The Trainer Declaration does not state if eligibility exemption is granted.														
TCA 13	P161-07168	The Trainer Declaration does not include the code of the qualification in which the student is seeking to enrol, nor does it include if eligibility exemption is granted.														
TCA 23	P150-06936															
TCA 30	P142-06634	Trainer Declaration does not include the qualification the student is seeking to enrol in.														

Reference	Control Weakness	Training Provider comments on cause of non-compliance									
<b>Eligibility</b>											
<p><b>3.1.5</b> Student does not appear to have been eligible for Skills First Funded training</p>	<p>Testing of 2 BPA and 40 TCA student files identified two (2) instances where, based on the completed eligibility form, the student appears not to have been eligible. The details are as follows:</p> <table border="1" data-bbox="360 443 1543 794"> <thead> <tr> <th data-bbox="360 443 504 528">Sample Number</th> <th data-bbox="504 443 678 528">Student ID</th> <th data-bbox="678 443 1543 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 504 643">TCA 7</td> <td data-bbox="504 528 678 643">P144-06754</td> <td data-bbox="678 528 1543 643">The student identified to be enrolled in a school and to be enrolled in the Commonwealth Government's Skills for Education and Employment Program and should therefore not be eligible for Skills First Funded training.</td> </tr> <tr> <td data-bbox="360 643 504 794">TCA 40</td> <td data-bbox="504 643 678 794">PG2-04152</td> <td data-bbox="678 643 1543 794">Student identified to have started 2 government funded courses at the same level as the one applying for. Comment from Training Provided delegate included that the student commenced these courses in the same qualification, however evidence to support the this was not provided.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul data-bbox="344 1155 1570 1265" style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 3.3</li> <li>• 2019 Guidelines about Determining Student Eligibility and Supporting Evidence</li> </ul>	Sample Number	Student ID	Finding	TCA 7	P144-06754	The student identified to be enrolled in a school and to be enrolled in the Commonwealth Government's Skills for Education and Employment Program and should therefore not be eligible for Skills First Funded training.	TCA 40	PG2-04152	Student identified to have started 2 government funded courses at the same level as the one applying for. Comment from Training Provided delegate included that the student commenced these courses in the same qualification, however evidence to support the this was not provided.	<p>TCA 7 - Applicant incorrectly selected that they were attending school. This was not the case and the application should have been corrected after seeking clarification from the applicant. This is an administration error.</p> <p>The Skills Victoria Training System (SVTS) creates an error upon uploading student data (Error 80050) when an applicant has incorrectly stated this information. This is then reviewed and corrected prior to claiming commencing, however the physical application was not amended.</p> <p>TCA 40 - Original application has Skills First Program form comment “[Student name] is still eligible for funding for the Diploma as his 2 previous commencements are in the same qualification - Diploma of Building and Construction (Building)”</p> <p><b>2019 Guidelines about Determining Student Eligibility and Supporting Evidence (Version 2.0, published 6 August 2019) provide:</b></p> <p>The ‘2 at level in a lifetime’ limit</p>
Sample Number	Student ID	Finding									
TCA 7	P144-06754	The student identified to be enrolled in a school and to be enrolled in the Commonwealth Government's Skills for Education and Employment Program and should therefore not be eligible for Skills First Funded training.									
TCA 40	PG2-04152	Student identified to have started 2 government funded courses at the same level as the one applying for. Comment from Training Provided delegate included that the student commenced these courses in the same qualification, however evidence to support the this was not provided.									

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		
		<p>2 at level: determining the number of courses previously commenced</p> <p>1.4. For the purpose of applying subclauses 2.3(c) and 2.3(d) of Schedule 1 of the VET Funding Contract, which are the eligibility criteria relating to the lifetime limit on commencements at the same level (the 2 at level lifetime limit), the following commencements are not taken into account:</p> <ul style="list-style-type: none"> <li>a. the Victorian Certificate of Education; Victorian Certificate of Applied Learning (Intermediate or Senior); International Baccalaureate Diploma; and senior secondary school certificates from other Australian jurisdictions;</li> <li>b. qualifications listed in the Foundation Skills List (Attachment 1 to these Guidelines);</li> <li>c. any VET certificates undertaken as part of a senior secondary qualification (including School Based Apprenticeships/Traineeships);</li> <li>d. where an individual is transitioning from a superseded qualification to the current version of the same qualification;</li> <li>e. where an individual is recommencing training in the same qualification (at either the same or a different provider);</li> </ul>

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Eligibility		<p>f. '22469VIC - Course in Introduction to the National Disability Insurance Scheme';</p> <p>g. any course or skill set undertaken as part of the Department of Education and Training 'Skills Uplift Pilot Program'; or h. '22510VIC – Course in Identifying and Responding to Family Violence Risk</p>

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Pre-Training Review</b>								
<p><b>3.2.1</b> Pre-Training Review was not dated by the Training Provider delegate</p>	<p>Testing of 2 BPA and 40 TCA student files identified one (1) instance where the pre training review was not dated by the Training Provider delegate. The details are as follows:</p> <table border="1" data-bbox="360 443 1541 579"> <thead> <tr> <th data-bbox="360 443 504 528">Sample Number</th> <th data-bbox="504 443 678 528">Student ID</th> <th data-bbox="678 443 1541 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 504 579">TCA 27</td> <td data-bbox="504 528 678 579">P168-07359</td> <td data-bbox="678 528 1541 579">Date of PTR assessment (Final delegates Authorisation Date) is not stated.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.1</li> </ul>	Sample Number	Student ID	Finding	TCA 27	P168-07359	Date of PTR assessment (Final delegates Authorisation Date) is not stated.	<p>Administrative error on TIVs behalf.</p>
Sample Number	Student ID	Finding						
TCA 27	P168-07359	Date of PTR assessment (Final delegates Authorisation Date) is not stated.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<b>Pre-Training Review</b>		
<p><b>3.2.2</b> Appropriate learning strategies and materials were not assessed in alignment with the requirements of the VET Funding Contract.</p>	<p>Testing of 2 BPA and 40 TCA student files identified forty-two (42) instances where the appropriate learning strategies and materials were not assessed as part of the pre-training review. The details are included in Appendix B.</p> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b></p> <p><b>Business Processes:</b> Pre-Training Review template does not incorporate or allow for the capturing of all contractual requirements.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.1(e)</li> </ul>	<p>TIV agrees that they have made an oversight with this clause.</p> <p>It will rectify this situation with a new Pre-Training Review process.</p>

Reference	Control Weakness	Training Provider comments on cause of non-compliance														
<b>Pre-Training Review</b>																
<p><b>3.2.3</b> Pre-Training Review does not consider individual's writing capabilities</p>	<p>Testing of 2 BPA and 40 TCA student files identified five (5) instances where consideration of the individual's existing educational attainment and capabilities, did not include a written component. The details are as follows:</p> <table border="1" data-bbox="360 443 1458 788"> <thead> <tr> <th>Sample Number</th> <th>Student ID</th> <th>Finding</th> </tr> </thead> <tbody> <tr> <td>TCA 4</td> <td>PAC9-07913</td> <td rowspan="5">LLN does not include a written component to fully assess if the program is the appropriate level for the student.</td> </tr> <tr> <td>TCA 16</td> <td>PDA7-07708</td> </tr> <tr> <td>TCA 25</td> <td>PAC9-07890</td> </tr> <tr> <td>TCA 34</td> <td>PDA7-07730</td> </tr> <tr> <td>TCA 38</td> <td>P180-07576</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.1()</li> </ul>	Sample Number	Student ID	Finding	TCA 4	PAC9-07913	LLN does not include a written component to fully assess if the program is the appropriate level for the student.	TCA 16	PDA7-07708	TCA 25	PAC9-07890	TCA 34	PDA7-07730	TCA 38	P180-07576	<p>TIV devised a 2nd and different LLN test that is completed in front of a trainer/assessor. This has served two purposes. It allows TIV to support the original results, and for the applicant to demonstrate their writing capability.</p> <p>TIV determined that the 2nd test would be temporarily removed from students participating in Distance Learning modes arising from the COVID-19 restrictions, including the 5 students noted in the Control Weakness area.</p> <p>In hindsight this was an error which is in course of being rectified. This would not have shown up as a non-compliance in the 2020 Internal Audit.</p>
Sample Number	Student ID	Finding														
TCA 4	PAC9-07913	LLN does not include a written component to fully assess if the program is the appropriate level for the student.														
TCA 16	PDA7-07708															
TCA 25	PAC9-07890															
TCA 34	PDA7-07730															
TCA 38	P180-07576															

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Pre-Training Review</b>								
<p><b>3.2.4</b> Previous competencies acquired to determine if RPL is applicable was not identified in alignment with the VET Funding Contract</p>	<p>Testing of 2 BPA and 40 TCA student files identified one (1) instance where the competencies previously acquired were not identified to assess if RPL was applicable. The details are as follows:</p> <table border="1" data-bbox="360 443 1458 612"> <thead> <tr> <th data-bbox="360 443 495 528">Sample Number</th> <th data-bbox="495 443 656 528">Student ID</th> <th data-bbox="656 443 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 612">TCA 5</td> <td data-bbox="495 528 656 612">PC20-07788</td> <td data-bbox="656 528 1458 612">Consideration of student's previous industry experience to determine if RPL is applicable, was not included as part of the Pre-Training Review.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.1(d)</li> </ul>	Sample Number	Student ID	Finding	TCA 5	PC20-07788	Consideration of student's previous industry experience to determine if RPL is applicable, was not included as part of the Pre-Training Review.	<p>RPL, RCC and CT applications are on the electronic TIV application form, but do not appear if the applicant does not check Yes to the request and upload their certified results (applicable for CT) or provide the additional details for RPL and RCC.</p> <p>This is a function of the VETenrol software of which we were not aware. TIV has sought to have it rectified.</p> <p>In the meantime, TIV will provide a work around solution to ensure compliance.</p> <p>The applicant in question holds a Bachelor of Arts (International) and is self-employed in other services, and undertook the course for personal interest or self-development. Based on these factors the applicant showed no previous industry experience to determine if RPL is applicable.</p>
Sample Number	Student ID	Finding						
TCA 5	PC20-07788	Consideration of student's previous industry experience to determine if RPL is applicable, was not included as part of the Pre-Training Review.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance												
<b>Pre-Training Review</b>														
<p><b>3.2.5</b> Steps to overcome individual's poor digital capability have not been identified</p>	<p>Testing of 2 BPA and 40 TCA student files identified four (4) instances where the individual's digital capability was assessed as poor, and steps on how to overcome any barriers could not be sighted. The details are as follows:</p> <table border="1" data-bbox="360 448 1458 735"> <thead> <tr> <th data-bbox="360 448 495 528">Sample Number</th> <th data-bbox="495 448 651 528">Student ID</th> <th data-bbox="651 448 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 576">TCA 2</td> <td data-bbox="495 528 651 576">P150-06951</td> <td data-bbox="651 528 1458 735" rowspan="4">Digital capability (word processing) has been assessed as poor, and subsequent support has not been documented for audit review.</td> </tr> <tr> <td data-bbox="360 576 495 624">TCA 15</td> <td data-bbox="495 576 651 624">P155-06900</td> </tr> <tr> <td data-bbox="360 624 495 671">TCA 16</td> <td data-bbox="495 624 651 671">PDA7-07708</td> </tr> <tr> <td data-bbox="360 671 495 735">TCA 31</td> <td data-bbox="495 671 651 735">P159-07114</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.1(f)</li> </ul>	Sample Number	Student ID	Finding	TCA 2	P150-06951	Digital capability (word processing) has been assessed as poor, and subsequent support has not been documented for audit review.	TCA 15	P155-06900	TCA 16	PDA7-07708	TCA 31	P159-07114	<p>TIV agrees that it has made an oversight with this clause.</p> <p>It will take steps to rectify this situation in conjunction with its proposed updated Pre-Training Review process.</p>
Sample Number	Student ID	Finding												
TCA 2	P150-06951	Digital capability (word processing) has been assessed as poor, and subsequent support has not been documented for audit review.												
TCA 15	P155-06900													
TCA 16	PDA7-07708													
TCA 31	P159-07114													

Reference	Control Weakness	Training Provider comments on cause of non-compliance
<b>Pre-Training Review</b>		
<p><b>3.2.6</b> Pre-Training Review did not document why the program was most suitable for the student in alignment with the requirements of the VET Funding Contract.</p>	<p>Testing of 2 BPA and 40 TCA student files identified thirty-nine (39) instances where the reason as to why the program was determined as suitable and the most suitable training option for the individual was not documented. The details are included in Appendix B.</p> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> <b>Business Processes:</b> Pre-Training Review template does not incorporate or allow for the capturing of all contractual requirements.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 5.4</li> </ul>	<p>TIV agrees that they have made an oversight with this clause.</p> <p>It will rectify this situation with a new Pre-Training Review process and educate its staff regarding the procedure for accepting applicants into TIV courses.</p>

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
Training Plan								
<p><b>3.3.1</b> The Training Plan did not specify the delivery modes to be used for each unit of competency in alignment with the VET Funding Contract</p>	<p>Testing of 1 BPA and 3 TCA student files identified one (1) instance where the training plan does not specify the delivery modes to be used for each unit of competency. The details are as follows:</p> <table border="1" data-bbox="360 408 1458 576"> <thead> <tr> <th data-bbox="360 408 495 491">Sample Number</th> <th data-bbox="495 408 656 491">Student ID</th> <th data-bbox="656 408 1458 491">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 491 495 576">BPA 1</td> <td data-bbox="495 491 656 576">LC20-07873</td> <td data-bbox="656 491 1458 576">Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> <b>Business Processes:</b> Admin error as the Training Plan was not completed as per normal business process.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 7.2</li> </ul>	Sample Number	Student ID	Finding	BPA 1	LC20-07873	Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency.	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p>
Sample Number	Student ID	Finding						
BPA 1	LC20-07873	Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance												
<b>Training Plan</b>														
<p><b>3.3.2</b> Training Plan does not align with the relevant TAS in accordance with the requirements of the VET Funding Contract</p>	<p>Testing of 1 BPA and 3 TCA student files identified nine (9) instances where the training plan details do not align to the relevant TAS. The details are as follows:</p> <table border="1" data-bbox="360 408 1458 1193"> <thead> <tr> <th data-bbox="360 408 495 491">Sample Number</th> <th data-bbox="495 408 656 491">Student ID</th> <th data-bbox="656 408 1458 491">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 491 495 962">BPA 1</td> <td data-bbox="495 491 656 962">LC20-07873</td> <td data-bbox="656 491 1458 962">           Training plan does not align to the TAS. Misalignments have been noted for assessment methods, for the following units:           <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Work effectively and sustainably in the construction industry CPCCCM1012A</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Apply OHS requirements, policies and procedures in the construction industry CPCCOHS2001A</li> <li>- Plan and organise work CPCCCM1013A who actually undertook the assessment</li> <li>- Conduct workplace communication CPCCCM1014A</li> <li>- Conduct workplace communication CPCCCM1014A</li> </ul> </td> </tr> <tr> <td data-bbox="360 962 495 1078">TCA 33</td> <td data-bbox="495 962 656 1078">LC18-06116</td> <td data-bbox="656 962 1458 1078">Training plan does not align to the TAS. Misalignments have been noted for assessment methods and trainer names for the unit Install flooring systems CPCCCA3003A</td> </tr> <tr> <td data-bbox="360 1078 495 1193">TCA 36</td> <td data-bbox="495 1078 656 1193">LC18-06276</td> <td data-bbox="656 1078 1458 1193">Training plan does not align to the TAS. Misalignments have been noted for assessment methods and trainer names for the unit Carry out measurements and calculations CPCCCM1015A</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b></p>	Sample Number	Student ID	Finding	BPA 1	LC20-07873	Training plan does not align to the TAS. Misalignments have been noted for assessment methods, for the following units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Work effectively and sustainably in the construction industry CPCCCM1012A</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Apply OHS requirements, policies and procedures in the construction industry CPCCOHS2001A</li> <li>- Plan and organise work CPCCCM1013A who actually undertook the assessment</li> <li>- Conduct workplace communication CPCCCM1014A</li> <li>- Conduct workplace communication CPCCCM1014A</li> </ul>	TCA 33	LC18-06116	Training plan does not align to the TAS. Misalignments have been noted for assessment methods and trainer names for the unit Install flooring systems CPCCCA3003A	TCA 36	LC18-06276	Training plan does not align to the TAS. Misalignments have been noted for assessment methods and trainer names for the unit Carry out measurements and calculations CPCCCM1015A	<p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p>
Sample Number	Student ID	Finding												
BPA 1	LC20-07873	Training plan does not align to the TAS. Misalignments have been noted for assessment methods, for the following units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Work effectively and sustainably in the construction industry CPCCCM1012A</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Apply OHS requirements, policies and procedures in the construction industry CPCCOHS2001A</li> <li>- Plan and organise work CPCCCM1013A who actually undertook the assessment</li> <li>- Conduct workplace communication CPCCCM1014A</li> <li>- Conduct workplace communication CPCCCM1014A</li> </ul>												
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TCA 36	LC18-06276	Training plan does not align to the TAS. Misalignments have been noted for assessment methods and trainer names for the unit Carry out measurements and calculations CPCCCM1015A												

Reference	Control Weakness	Training Provider comments on cause of non-compliance
Training Plan	<p><b>Business Process:</b> Training plan and TAS did not match to align to the requirements of the VET Funding Contract</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 7.9</li> </ul>	

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Training Plan</b>								
<p><b>3.3.3</b> Training Plan data does not align to SVTS data</p>	<p>Testing of 1 BPA and 3 TCA student files identified four (4) instances where the training plan data does not align to the data recorded in SVTS. The details are as follows:</p> <table border="1" data-bbox="360 408 1458 740"> <thead> <tr> <th data-bbox="360 408 495 491">Sample Number</th> <th data-bbox="495 408 656 491">Student ID</th> <th data-bbox="656 408 1458 491">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 491 495 740">BPA 1</td> <td data-bbox="495 491 656 740">LC20-07873</td> <td data-bbox="656 491 1458 740">           Activity End Date was left blank on the Training Plan and did not align with the date recorded in SVTS for the following units:           <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul> </td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> <b>Business Processes:</b> Normal process was not to update the actual activity end date for withdrawn units.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 7.10</li> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 12</li> </ul>	Sample Number	Student ID	Finding	BPA 1	LC20-07873	Activity End Date was left blank on the Training Plan and did not align with the date recorded in SVTS for the following units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul>	<p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>
Sample Number	Student ID	Finding						
BPA 1	LC20-07873	Activity End Date was left blank on the Training Plan and did not align with the date recorded in SVTS for the following units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul>						

Reference	Control Weakness	Training Provider comments on cause of non-compliance													
<b>Training Participation</b>															
<p><b>3.4.1</b> Valid second point of Evidence of Participation could not be provided in alignment with the VET Funding Contract</p>	<p>Testing of 2 BPA and 40 TCA student files identified seven (7) instances where a valid second point of evidence of participation could not be provided. The details are as follows:</p> <table border="1" data-bbox="360 408 1458 895"> <thead> <tr> <th data-bbox="360 408 495 491">Sample Number</th> <th data-bbox="495 408 656 491">Student ID</th> <th data-bbox="656 408 1458 491">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 491 495 740">BPA 1</td> <td data-bbox="495 491 656 740">LC20-07873</td> <td data-bbox="656 491 1458 740">           Second evidence of participation could not be provided for the following withdrawn units:           <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul> </td> </tr> <tr> <td data-bbox="360 740 495 788">TCA 19</td> <td data-bbox="495 740 656 788">P155-06908</td> <td data-bbox="656 740 1458 895" rowspan="3">Withdrawn student for which a second evidence of participation could not be provided.</td> </tr> <tr> <td data-bbox="360 788 495 836">TCA 27</td> <td data-bbox="495 788 656 836">P168-07359</td> </tr> <tr> <td data-bbox="360 836 495 895">TCA 30</td> <td data-bbox="495 836 656 895">PG2-04152</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> <b>People and Organisation:</b> Staff have not backdated the activity end date to the last date of engagement, however to the withdrawal date.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>• 2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 11.3</li> </ul>	Sample Number	Student ID	Finding	BPA 1	LC20-07873	Second evidence of participation could not be provided for the following withdrawn units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul>	TCA 19	P155-06908	Withdrawn student for which a second evidence of participation could not be provided.	TCA 27	P168-07359	TCA 30	PG2-04152	<p>All samples provided are withdrawn/cancelled applicants. TIV concedes that the second point of evidence of participation was not captured after the 30 days from the original point of evidence.</p> <p>In the case of LC20-07873 (Apprentice) – the 4 units in question began to be delivered on 6<sup>th</sup> October 2020. The next monthly contact with the Trainer was scheduled for November 2020.</p> <p>Upon contact from the trainer and assessor on 16.11.2020, TIV was notified by the student he had left the employer and gained employment elsewhere. This was confirmed in writing via email from the student on 18.11.2020.</p> <p>Upon receiving this information TIV cancelled the student as of 19.11.2020.</p> <p>The Epsilon contact with TIV was terminated on 9<sup>th</sup> October 2020.</p> <p>In a case such as this, it is impossible to provide the second point of evidence.</p>
Sample Number	Student ID	Finding													
BPA 1	LC20-07873	Second evidence of participation could not be provided for the following withdrawn units: <ul style="list-style-type: none"> <li>- Use carpentry tools and equipment CPCCCA2002B</li> <li>- Use explosive power tools CPCCCM2007B</li> <li>- Plan and organise work CPCCCM1013A</li> <li>- Handle carpentry materials CPCCCA2011A</li> </ul>													
TCA 19	P155-06908	Withdrawn student for which a second evidence of participation could not be provided.													
TCA 27	P168-07359														
TCA 30	PG2-04152														

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
<b>Training Participation</b>								
<p><b>3.4.2</b> Evidence of Participation was sighted prior to the unit activity start date</p>	<p>Testing of 2 BPA and 40 TCA student files identified one (1) instance where evidence of participation was dated prior to the activity start date. The details are as follows:</p> <table border="1" data-bbox="360 443 1458 611"> <thead> <tr> <th data-bbox="360 443 495 528">Sample Number</th> <th data-bbox="495 443 656 528">Student ID</th> <th data-bbox="656 443 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 611">TCA 38</td> <td data-bbox="495 528 656 611">P180-07576</td> <td data-bbox="656 528 1458 611">Evidence sighted of student work dated 4/8/2020 which is two days prior to Activity Start Date on 6/8/2020.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 11.3</li> </ul>	Sample Number	Student ID	Finding	TCA 38	P180-07576	Evidence sighted of student work dated 4/8/2020 which is two days prior to Activity Start Date on 6/8/2020.	<p>The student has dated the work incorrectly. TIV has provided evidence of the actual date of submission of the assessment in the Learner Management System which contradicts the student's error. This system time and date stamps the submission.</p> <p>The date of submission was Friday, 25 September 2020, 6:26 PM</p> <p>TIV has also provided a trainer endorsed attendance sheet showing that the date the unit was delivered was <i>after</i> the incorrectly dated assessment.</p>
Sample Number	Student ID	Finding						
TCA 38	P180-07576	Evidence sighted of student work dated 4/8/2020 which is two days prior to Activity Start Date on 6/8/2020.						

Reference	Control Weakness	Training Provider comments on cause of non-compliance								
<b>Concession</b>										
<p><b>3.5</b> Valid evidence of concession was not retained in student file</p>	<p>Testing of 2 BPA and 104 TCA student files identified two (2) instances where proof of concession card for the student could not be provided. The details are as follows:</p> <table border="1" data-bbox="360 443 1458 632"> <thead> <tr> <th data-bbox="360 443 495 528">Sample Number</th> <th data-bbox="495 443 656 528">Student ID</th> <th data-bbox="656 443 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 576">TCA 74</td> <td data-bbox="495 528 656 576">LC19-06836</td> <td data-bbox="656 528 1458 576" rowspan="2">Concession card was not provided</td> </tr> <tr> <td data-bbox="360 576 495 632">TCA 95</td> <td data-bbox="495 576 656 632">LC19-07089</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> N/A – TCA exceptions only</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 4.7</li> <li>2019 Guidelines about Fees</li> </ul>	Sample Number	Student ID	Finding	TCA 74	LC19-06836	Concession card was not provided	TCA 95	LC19-07089	<p>TIV agrees that the concession cards were not provided.</p>
Sample Number	Student ID	Finding								
TCA 74	LC19-06836	Concession card was not provided								
TCA 95	LC19-07089									

Reference	Control Weakness	Training Provider comments on cause of non-compliance						
Fees								
<p><b>3.6</b> Hourly fee on the Statement of Fees does not match amount recorded in SVTS</p>	<p>Testing of 2 BPA student files identified one (1) instance where the hourly tuition fee recorded on the Statement of Fees does not match the hourly tuition fee recorded in SVTS. The details are as follows:</p> <table border="1" data-bbox="360 448 1458 616"> <thead> <tr> <th data-bbox="360 448 495 528">Sample Number</th> <th data-bbox="495 448 651 528">Student ID</th> <th data-bbox="651 448 1458 528">Finding</th> </tr> </thead> <tbody> <tr> <td data-bbox="360 528 495 616">BPA 2</td> <td data-bbox="495 528 651 616">PC20-07927</td> <td data-bbox="651 528 1458 616">Statement of Fees Tuition Fee Amount of \$0.21 per hour does not match SVTS data of \$4.13 per hour.</td> </tr> </tbody> </table> <p>The Training Provider did not identify this as an area of non-compliance when completing its most recent Internal Audit Checklist.</p> <p><b>Root Cause(s)</b> <b>Business Processes:</b> Admin error occurred where the normal business process was not followed.</p> <p><b>Contract Reference</b></p> <ul style="list-style-type: none"> <li>2018-19 Standard VET Funding Contract (extended to 31 December 2020) Version 3, Schedule 1, Clause 12</li> <li>2019 Guidelines about Fees</li> </ul>	Sample Number	Student ID	Finding	BPA 2	PC20-07927	Statement of Fees Tuition Fee Amount of \$0.21 per hour does not match SVTS data of \$4.13 per hour.	<p>This was an Administration error. The full cost of the student’s qualification was treated as one lump sum rather than a breakdown of the charges into Tuition Fee, Application Fee and Material Fee.</p> <p>Had this been the case, the Tuition Fee hourly rate would have been \$0.21.</p>
Sample Number	Student ID	Finding						
BPA 2	PC20-07927	Statement of Fees Tuition Fee Amount of \$0.21 per hour does not match SVTS data of \$4.13 per hour.						

#### 4. Management Action Plan

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.1.1	Evidence of eligibility form was not provided in alignment with the VET Funding Contract	<i>N/A – TCA exceptions only</i>	The required documentary evidence was provided at audit and subsequently. TIV has not developed an action plan for this.		
4.1.2	Student Declaration was not completed in alignment with the VET Funding Contract	<i>N/A – TCA exceptions only</i>	Update Evidence of eligibility and student declaration form to align to the VET Funding Contract. As of 2020 TIV have used the prescribed form as advised on the SVTS system. There is no further rectification to be completed at this stage	Peter Giannopoulos	<b>For all future changes</b>
4.1.3	Incorrect reporting of Eligibility exemption.	<i>N/A – TCA exceptions only</i>	Implement regular internal audits to assess if all information is recorded accurately.	Narelle Weeks	<b>1/7/2021</b>
4.1.4	Training Provider Declaration was not completed in alignment with the VET Funding Contract	<i>N/A – TCA exceptions only</i>	Update Evidence of eligibility and student declaration form to align to the VET Funding Contract. Implement regular internal audits to assess if all information is recorded accurately. As of 2020 TIV have used the prescribed form as advised on the SVTS system. There is no further rectification to be completed at this stage	Peter Giannopoulos  Narelle Weeks (audit)	<b>For all future changes</b>  <b>1/07/2021</b>
4.1.5	Student does not appear to have been eligible for Skills First Funded training	<i>N/A – TCA exceptions only</i>	TCA 7 Implement regular internal audits to assess if all information is recorded accurately. TCA 40 The required rationale for Eligibility i.e. the applicant was re-applying for the same qualification, was supplied at audit.	Narelle Weeks	<b>01/07/2021</b>
4.2.1	Pre-Training Review was not dated by the Training Provider delegate	<i>N/A – TCA exceptions only</i>	Implement regular internal audits to assess if all information is completed as part of the PTR.	Narelle Weeks	<b>01/07/2021</b>
4.2.2	Appropriate learning strategies and materials	<i>Business Processes</i>	Rectification will be included in the revised Pre-Training Review process. In the interim, TIV as a temporary measure has put in place the following:	John Macdonald	<b>30/08/2021</b>

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
	were not assessed in alignment with the requirements of the VET Funding Contract		<p><b>Temporary Measure (immediate)</b></p> <ul style="list-style-type: none"> <li>• TIV PTR Form now has additional items that are now being captured: <ul style="list-style-type: none"> <li>○ Requests for Credit Transfers and/or RPL</li> <li>○ Document the reasons why a course is “most suitable” for the applicant.</li> <li>○ Document the reasons why a course is “not suitable” for the applicant.</li> <li>○ We have strengthened the authorised Delegate process in determining suitability.</li> <li>○ Existing LLN test now includes a test of their writing abilities</li> </ul> </li> </ul> <p><b>Long Term Solution (by 30/8/2021)</b></p> <ul style="list-style-type: none"> <li>• New PTR Form to be revised</li> <li>• Test and Re-test</li> <li>• Training Of All Staff</li> </ul>		
4.2.3	Pre-Training Review does not consider individual’s writing capabilities	<i>N/A – TCA exceptions only</i>	Rectification will be included in the revise Pre-Training Review process	John Macdonald	<b>30/08/2021</b>
4.2.4	Previous competencies acquired to determine if RPL is applicable was not identified in alignment with the VET Funding Contract	<i>N/A – TCA exceptions only</i>	VETenrol, the software supplier, has been asked to rectify this anomaly. In the meantime a ‘work around’ process in the Pre-Training Review will be included to include relevant questions that are outside the VETenrol process.	Peter Giannopoulos	<b>30/8/2021</b>
4.2.5	Steps to overcome individual’s poor digital capability have not been identified	<i>N/A – TCA exceptions only</i>	This will be rectified through the development of a more rigorous Pre-Training Review and follow up process.	John Macdonald	<b>30/08/2021</b>

Ref.	Nature of exceptions identified	Root Cause	Action to correct non-compliance – as developed by the Training Provider	Responsible Person	Target Completion Date
4.2.6	Pre-Training Review did not document why the program was most suitable for the student in alignment with the requirements of the VET Funding Contract	<i>Business Processes</i>	Update the Pre-Training Review to include all information in accordance with the VET Funding Contract.	John Macdonald	<b>30/08/2021</b>
4.3.1	The Training Plan did not specify the delivery modes to be used for each unit of competency in alignment with the VET Funding Contract	<i>Business Processes</i>	Reiterate to staff the importance to include all information on the Training Plan in alignment with the VET Funding Contract and conduct regular audits to assure compliance.	Narelle Weeks	<b>30/4/2021</b>
4.3.2	Training Plan does not align with the relevant TAS in accordance with the requirements of the VET Funding Contract	<i>N/A – TCA exceptions only</i>	Update both the Training Plan and TAS to ensure alignment and conduct regular training plan audits to ensure that Trainers are following their instructions.	Peter Giannopoulos	<b>31/03/2021</b>
4.3.3	Training Plan data does not align to SVTS data	<i>Business Processes</i>	Update the business process to ensure Activity End Dates are recorded on the student's Training Plan, including for withdrawn units.	Narelle Weeks	<b>30/4/2021</b>
4.4.1	Valid second point of Evidence of Participation could not be provided in alignment with the VET Funding Contract	<i>People and Organisation</i>	Reiterate to staff the guidelines for withdrawn units and recording the accurate Activity End Date. Undertake regular audits to check compliance.	Narelle Weeks	<b>30/4/2021</b>
4.4.2	Evidence of Participation was sighted prior to the unit activity start date	<i>N/A – TCA exceptions only</i>	The required evidence was provided at audit. As of 12.03.2021 a project to remove this section from assessments has started and TIV will use the date and time stamp provided by LMS for submission dates.	Peter Giannopoulos	<b>31/03/2021</b>

<b>Ref.</b>	<b>Nature of exceptions identified</b>	<b>Root Cause</b>	<b>Action to correct non-compliance – as developed by the Training Provider</b>	<b>Responsible Person</b>	<b>Target Completion Date</b>
<b>4.5</b>	Valid evidence of concession was not retained in student file	<i>N/A – TCA exceptions only</i>	Implement regular internal audits to assess if all information is retained in accordance with the VET Funding Contract.	Narelle Weeks	<b>01/07/2021</b>
<b>4.6</b>	Hourly fee on the Statement of Fees does not match amount recorded in SVTS	<i>Business Processes</i>	Implement regular internal audits to assess if all information is retained in accordance with the VET Funding Contract.	Narelle Weeks	<b>30/4/2021</b>

## 5. Status of Prior Audit Findings

The following comments relate to the status of the Management Action Plan from the BPA/TCA audit report dated 30 August 2018.

Reference	Prior Finding	Implementation Status & Comments
5.1.1	Pre-Training Review did not capture the suitability and appropriateness of the qualification for students	<b>In Progress</b> As per Finding 3.2.2 and Finding 3.2.6, instances were identified to support the prior finding.
5.1.2	LLN assessment utilised did not include a writing component	<b>In Progress</b> As per Finding 3.2.3, instances were identified to support the prior finding.
5.2	Training Plans did not include all aspects required by the VET Funding Contract.	<b>In Progress</b> As per Finding 3.3.1, instances were identified to support the prior finding.
5.3	Required evidence of participation could not be identified for a number of students.	<b>In Progress</b> As per Finding 3.4.1, instances were identified to support the prior finding.

## 6. Next Steps

As noted in the letter dated 10 February 2021 notifying your organisation of this audit, other potential actions that may be taken by the Department following this contract compliance audit include:

- Evidence of Eligibility audit, assessing whether a Training Provider has sufficient evidence of eligibility to support student course enrolments for which government subsidised training has been claimed.
- Evidence of Concession audit, assessing whether a Training Provider has sufficient evidence of concession to support the granting of a fee concession claimed under the previous Contract
- Evidence of Participation audit, assessing whether a Training Provider has sufficient evidence of participation to support claims for payment for training delivery in specific subjects for which funding has been claimed.
- Evidence of Fees (EOF) audit, assessing whether there is sufficient evidence to demonstrate that students were actually charged the fees reported as being charged in the SVTS. The EOF may also include a determination of whether these fees were subsequently paid by students
- Pre-Training Review, assessing the process undertaken between the Training Provider and a prospective student to determine the most suitable and appropriate training for that individual, to confirm that it has been conducted and documented in accordance with the requirements of the Contract and the Quality Charter.
- Rectification Review, assessing the extent to which the Management Action Plan arising from the Business Process and/or Transactional Compliance Audits have been implemented by a Training Provider.
- Quality Review, assessing the quality of Training Services that have been, or are being, delivered at a Training Provider.
- A combination of audits and reviews.
- Monetary penalties may be imposed.
- Further action as noted in the Contract.
- No further action.

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

## Appendix A – Eligibility Exceptions

Sample number	Student ID	Program Name	Program ID	Date of eligibility assessment	Program C'ment Date	Rep.	Rep.	Rep.	Rep.	Rep.	Other information	Training Provider Comments
						3.1.1	3.1.2	3.1.3	3.1.4	3.1.5		
TCA 7	P144-06754	Diploma of Building and Construction (Building)	CPC50210	12/07/2019	11/09/2019	✓	✓	✓	✓	✓	<p>Student Declaration does not include the code of the qualification seeking to enrol in. This information is included in the Trainer Declaration section. The student identified to be enrolled in a school and to be enrolled in the Commonwealth Government's Skills for Education and Employment Program and should therefore not be eligible for Skills First Funded training.</p>	<p>Sample 7 - P144-06754 – Enrolled 11/7/19 – Prior to 6 August change in SFP form.</p> <p>TCA 7 - Applicant incorrectly selected that they were attending school. This was not the case and the application should have been corrected after seeking clarification from the applicant. This is an administration error.</p> <p>The Skills Victoria Training System (SVTS) creates an error upon uploading student data (Error 80050) when an applicant has incorrectly stated this information. This is then reviewed and corrected prior to claiming commencing, however the physical application was not amended.</p>
TCA 11	P126-06223	Diploma of Building and Construction (Building)	CPC50210	24/01/2020	6/02/2020			✓			<p>Trainer Declaration completed to grant eligibility exemption to the student, however this is not recorded in SVTS nor evidence accordingly retained.</p>	<p>Administrative error on behalf of the TIV staff member. A 'Yes' box was ticked instead of the 'No'.</p> <p>The applicant was not granted an exemption because the applicant was eligible for 2 funded courses at the time of the application being completed.</p>
TCA 12	P169-07244	Certificate IV in Building and	CPC40110	26/09/2019	28/10/2019		✓		✓		<p>Student Declaration does not include the code of the qualification seeking to enrol in. This information is included as part of the Enrolment form and PTR process.</p>	<p>Administrative errors on behalf of TIV. TIV did not update the requirements from the 2019 Guidelines About Determining Student Eligibility and</p>

		Construction (Building)									The Trainer Declaration does not state if eligibility exemption is granted. This information is not captured as part of the Enrolment form and PTR process.	Supporting Evidence (version 1.0) published 30 October 2018, to the version 2.0 published August 2019.  The Internal audit checklist would not have taken this into account as a non-compliance in 2019 as the 2019 audit was completed on 14.06.2019 and the 2020 internal audit was based on the 2020 Guidelines About Determining Student Eligibility and Supporting Evidence v1.0 effective from 1 January 2020.
<b>TCA 13</b>	P161-07168	Certificate IV in Building and Construction (Building)	CPC40110	14/08/2019	20/08/2019		✓		✓		Student Declaration does not include the code of the qualification seeking to enrol in. The Trainer Declaration does not include the code of the qualification in which the student is seeking to enrol, nor does it include if eligibility exemption is granted. The code of the qualification is captured as part of the Enrolment form and PTR process.	Administrative errors on behalf of TIV. TIV did not update the requirements from the 2019 Guidelines About Determining Student Eligibility and Supporting Evidence (version 1.0) published 30 October 2018, to the version 2.0 published August 2019.  The Internal audit checklist would not have taken this into account as a non-compliance in 2019 as the 2019 audit was completed on 14.06.2019 and the 2020 internal audit was based on the 2020 Guidelines About Determining Student Eligibility and Supporting Evidence v1.0 effective from 1 January 2020.
<b>TCA 20</b>	PC19-07363	Certificate III in Carpentry	CPC30211	18/11/2019	20/11/2019		✓				Student Declaration does not include the code of the qualification seeking to enrol in. This information is included in the Trainer Declaration section.	Administrative errors on behalf of TIV. TIV did not update the requirements from the 2019 Guidelines About Determining Student Eligibility and Supporting Evidence (version 1.0) published 30 October 2018, to the version 2.0 published August 2019.  The Internal audit checklist would not have taken this into account as a non-compliance in 2019 as the 2019 audit was completed on 14.06.2019 and the 2020 internal audit was based on the 2020

												Guidelines About Determining Student Eligibility and Supporting Evidence v1.0 effective from 1 January 2020.
<b>TCA 23</b>	P150-06936	Diploma of Building and Construction (Building)	CPC50210	11/07/2019	30/10/2019		✓		✓		Student Declaration does not include the code of the qualification seeking to enrol in. The Trainer Declaration does not the code of the qualification in which the student is seeking to enrol, nor does it include if eligibility exemption is granted. The code of the qualification is captured as part of the Enrolment form and PTR process.	Sample 23 - P150-06936 – Enrolled 10/5/19 – Prior to 6 August change in SFP form.
<b>TCA 30</b>	P142-06634	Certificate IV in Building and Construction (Building)	CPC40110	28/11/2018	28/02/2019				✓		Trainer Declaration does not include the qualification the student is seeking to enrol in. This information is captured in the enrolment form, however not on the PTR.	Administrative errors on behalf of the TIV staff member/s.
<b>TCA 32</b>	P190-07481	Certificate IV in Building and Construction (Building)	CPC40110	NP	24/02/2020	✓					Evidence of student eligibility as part of the Skills First Program was not provided. Student's Medicare Card and Enrolment information sighted. Driver's Licence was sighted.	Enrolment information and Medicare was provided in original sample information and again on 25.02.2021 as requested. EoE appears not to have been scanned. This was an administrative error. It is available if required.
<b>TCA 40</b>	PG2-04152	Diploma of Building and Construction (Building)	CPC50210	12/02/2019	19/03/2019					✓	Student identified to have started 2 government funded courses at the same level as the one applying for. Comment from Training Provided delegate included that student commenced these courses in the same qualification, however any evidence to support this was not provided.	TCA 40 - Original application has Skills First Program form comment "Eiwan is still eligible for funding for the Diploma as his 2 previous commencements are in the same qualification - Diploma of Building and Construction (Building)" 2019 Guidelines about Determining Student Eligibility and Supporting Evidence (Version 2.0, published 6 August 2019) provide: The '2 at level in a lifetime' limit 2 at level: determining the number of courses previously commenced 1.4. For the purpose of applying subclauses 2.3(c) and 2.3(d) of Schedule 1 of the VET Funding Contract, which are the eligibility criteria relating to



## Appendix B – PTR Exceptions

Sample No.	Student ID	Program Name	Program ID	Program Commencement Date	Date of PTR assessment	Rep. Ref.	Other information	Training Provider Comments				
						3.2.1	3.2.2	3.2.3	3.2.4	3.2.5		
BPA 1	LC20-07873	Certificate III in Carpentry	CPC30211	14/07/2020	25/06/2020	✓	✓	✓	✓	✓	<p>The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.</p> <p>The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.</p>	<p>TIV agrees that they have made an oversight with this clause.</p> <p>It will rectify this situation with a new Pre-Training Review process.</p>
BPA 2	PC20-07927	Certificate III in Carpentry	CPC30211	19/08/2020	17/07/2020		✓			✓	<p>The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.</p> <p>The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.</p>	<p>TIV agrees that they have made an oversight with this clause.</p> <p>It will rectify this situation with a new Pre-Training Review process.</p>
TCA 1	P158-07079	Certificate IV in Building and Construction (Building)	CPC40110	16/07/2019	3/07/2019		✓			✓	<p>The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.</p> <p>The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.</p>	<p>TIV agrees that they have made an oversight with this clause.</p> <p>It will rectify this situation with a new Pre-Training Review process.</p>
TCA 2	P150-06951	Certificate IV in Building and	CPC40308	4/06/2019	13/05/2019		✓			✓	<p>The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.</p> <p>The Pre-Training Review includes a statement that</p>	<p>TIV agrees that they have made an oversight with this clause.</p>

		Construction (Estimating)									the student is suitable, however, the statement does not include "why" the student has been deemed suitable. Digital capability (word processing) has been assessed as poor, and subsequent support has not been documented for audit review.	It will rectify this situation with a new Pre-Training Review process.
TCA 3	P151-07040	Certificate IV in Building and Construction (Building)	CPC40110	19/06/2019	18/06/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 4	PAC9-07913	Certificate IV in Building and Construction (Building)	CPC40110	21/07/2020	7/07/2020		✓	✓		✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. LLN does not include a written component to fully assess if the program is the appropriate level for the student. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 5	PC20-07788	Certificate III in Carpentry	CPC30211	19/08/2020	1/06/2020		✓		✓	✓	Consideration of student's previous industry experience to determine if RPL is applicable, was not included as part of the Pre-Training Review. The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	RPL, RCC and CT applications are on the electronic TIV application form, but do not appear if the applicant does not check Yes to the request and upload their certified results (applicable for CT) or provide the additional details for RPL and RCC.  This is a function of the VETenrol software of which we were not aware. TIV has sought to have it rectified.  In the meantime, TIV will provide a work around solution to ensure compliance.



TCA 10	P155-06867	Certificate IV in Building and Construction (Building)	CPC40110	30/05/2019	3/04/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 11	P126-06223	Diploma of Building and Construction (Building)	CPC50210	6/02/2020	24/01/2020		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 12	P169-07244	Certificate IV in Building and Construction (Building)	CPC40110	28/10/2019	26/09/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 13	P161-07168	Certificate IV in Building and Construction (Building)	CPC40110	20/08/2019	14/08/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 14	PC19-06890	Certificate III in Carpentry	CPC30211	8/05/2019	16/04/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

												does not include "why" the student has been deemed suitable.	
TCA 15	P155-06900	Certificate IV in Building and Construction (Building)	CPC40110	30/05/2019	22/04/2019		✓			✓	✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable. Digital capability (word processing and creating spreadsheets) has been assessed as poor, and subsequent support has not been documented for audit review.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 16	PDA7-07708	Diploma of Building and Construction (Building)	CPC50210	21/06/2020	6/05/2020		✓	✓		✓	✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. LLN does not include a written component to fully assess if the program is the appropriate level for the student. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable. Digital capability (word processing and creating spreadsheets) has been assessed as poor, and subsequent support has not been documented for audit review.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 17	P155-06881	Certificate IV in Building and Construction (Building)	CPC40110	30/05/2019	9/04/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

TCA 18	P155-06965	Certificate IV in Building and Construction (Building)	CPC40110	30/05/2019	19/05/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 19	P155-06908	Certificate IV in Building and Construction (Building)	CPC40110	30/05/2019	30/04/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 20	PC19-07363	Certificate III in Carpentry	CPC30211	20/11/2019	13/11/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 21	LC19-06860	Certificate IV in Building and Construction (Building)	CPC40110	11/02/2020	11/12/2019		✓				The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process. TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 22	P150-06936	Certificate IV in Building and	CPC40110	16/05/2019	9/05/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

		Construction (Building)										does not include "why" the student has been deemed suitable.	
TCA 23	P150-06936	Diploma of Building and Construction (Building)	CPC50210	30/10/2019	11/07/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 24	P190-07513	Certificate IV in Building and Construction (Building)	CPC40110	24/02/2020	12/02/2020		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 25	PAC9-07890	Certificate IV in Building and Construction (Building)	CPC40110	17/08/2020	30/06/2020		✓	✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. LLN does not include a written component to fully assess if the program is the appropriate level for the student. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 26	P154-06756	Certificate IV in Building and Construction (Building)	CPC40110	25/03/2019	17/02/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

TCA 27	P168-07359	Certificate IV in Building and Construction (Building)	CPC40110	2/12/2019	NP	✓	✓					Date of PTR assessment ('Final delegates Authorisation Date') is not stated. The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.	Administrative error on TIVs behalf.
TCA 28	P157-07025	Certificate IV in Building and Construction (Building)	CPC40110	18/06/2019	5/06/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 29	P149-06857	Certificate IV in Building and Construction (Building)	CPC40110	15/05/2019	27/03/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 30	P142-06634	Certificate IV in Building and Construction (Building)	CPC40110	28/02/2019	27/11/2018		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 31	P159-07114	Certificate IV in Building and Construction (Building)	CPC40110	12/08/2019	28/07/2019		✓			✓	✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable. Digital capability (creating spreadsheets) has been	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

												assessed as poor, and subsequent support has not been documented for audit review.	
TCA 32	P190-07481	Certificate IV in Building and Construction (Building)	CPC40110	24/02/2020	3/02/2020		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 33	LC18-06116	Certificate III in Carpentry	CPC30211	6/05/2019	16/04/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 34	PDA7-07730	Diploma of Building and Construction (Building)	CPC50210	21/06/2020	14/05/2020		✓	✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. LLN does not include a written component to fully assess if the program is the appropriate level for the student. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 35	P150-06921	Diploma of Building and Construction (Building)	CPC50210	30/10/2019	11/07/2019		✓				✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

TCA 36	LC18-06276	Certificate III in Carpentry	CPC30211	17/04/2019	28/03/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 37	P158-07030	Certificate IV in Building and Construction (Building)	CPC40110	16/07/2019	12/06/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 38	P180-07576	Certificate IV in Building and Construction (Building)	CPC40110	14/04/2020	4/03/2020		✓	✓		✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. LLN does not include a written component to fully assess if the program is the appropriate level for the student. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 39	P151-06988	Certificate IV in Building and Construction (Building)	CPC40110	19/06/2019	27/05/2019		✓			✓	The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual. The Pre-Training Review includes a statement that the student is suitable, however, the statement does not include "why" the student has been deemed suitable.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.
TCA 40	PG2-04152	Diploma of Building and	CPC50210	19/03/2019	27/02/2019		✓				The Pre-Training Review document template does not ascertain that the proposed learning strategies and materials were appropriate for the individual.	TIV agrees that they have made an oversight with this clause. It will rectify this situation with a new Pre-Training Review process.

		Construction (Building)																		
<b>TOTAL</b>													<b>1</b>	<b>42</b>	<b>5</b>	<b>1</b>	<b>4</b>	<b>39</b>		

## Appendix C – Training Plan Exceptions

Sample No.	Student ID	Program Name	Subject Name	Apprentice/ Trainee?	Scheduled Hours Reported	Scheduled Hours on Training Plan	Rep. Ref. 3.3.1 ✓	Rep. Ref. 3.3.2 ✓	Rep. Ref. 3.3.3 ✓	Other information	Training Provider Comments
BPA 1	LC20- 07873	Certificate III in Carpentry	Use carpentry tools and equipment	Yes	96	96	✓	✓	✓	<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p> <p>Actual Activity End Date does not match data recorded in SVTS. Activity End Date is recorded as 19/11/2020, however is left blank on the Training Plan.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>

			Work effectively and sustainably in the construction industry		20	20	✓		<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>
			Use explosive power tools		16	16	✓	✓	<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p>

									<p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p> <p>Actual Activity End Date does not match data recorded in SVTS. Activity End Date is recorded as 19/11/2020, however is left blank on the Training Plan.</p>	<p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>
		Apply OHS requirements, policies and procedures in the construction industry	20	20	✓			<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect</p>	

											the units that have been withdrawn/discontinued.
			Plan and organise work		20	20	✓	✓	<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p> <p>Actual Activity End Date does not match data recorded in SVTS. Activity End Date is recorded as 19/11/2020, however is left blank on the Training Plan.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>	
			Conduct workplace communication		20	20	✓		<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of</p>	

									<p>Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p>	<p>competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>
			Handle carpentry materials		16	16	✓	✓	<p>Training Plan does not include all contractual requirements as it does not specify the delivery modes to be used for each unit of competency</p> <p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Employer Observations; and Questions and Answers, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Delivery modes per unit could not be matched against the TAS as they were not included in the Training Plan.</p> <p>Actual Activity End Date does not match data recorded in SVTS. Activity End Date is recorded as 19/11/2020, however is left blank on the Training Plan.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p>

											Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.
TCA 33	LC18-06116	Certificate III in Carpentry	Install flooring systems	Yes	40	40		✓		<p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Quiz; Assignment; Observation; and Work Sample, where the TAS includes Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Trainer names differ between the Training Plan and TAS.</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p> <p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states... <i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>
TCA 36	LC18-06276	Certificate III in Carpentry	Carry out measurements	Yes	20	20		✓		<p>Training Plan does not align to the TAS, as the assessment methods differ. The Training Plan includes Quiz; Assignment; Observation; Verbal Question; and Work Sample, where the TAS includes</p>	<p>This is an administrative error made by the Trainer and Assessor when completing the Training Plan and not detected by the Administration team.</p>

			and calculations						<p>Quizzes; Q &amp; A's; Project; Observations and oral questions.</p> <p>Trainer names differ between the Training Plan and TAS.</p>	<p>TIV does not have Trainer names in the TAS. Instead we maintain a register of trainers by course and the units of competence for which each is qualified to deliver.</p> <p>In this, we are following the Users' Guide To Standards for Registered Training Organisations 2015, "Components of training and assessment strategies" which states...</p> <p><i>"Either in a strategy or separately, document the human resources available to deliver the training product..."</i></p> <p>Administrative error on TIV's behalf. The training plan at the time of cancellation was not updated to reflect the units that have been withdrawn/discontinued.</p>	
<b>TOTAL</b>							<b>1</b>	<b>9</b>	<b>4</b>		

## Appendix D – Training Participation Exceptions

Sample number	Student ID	Program Name	Program ID	Subject Name	Subject ID	Activity Start Date	Activity End Date	Outcome ID - National	Rep. Ref. 3.4.1	Rep. Ref. 3.4.2	Other information	Training Provider Comments
BPA 1	LC20-07873	Certificate III in Carpentry	CPC30211	Use carpentry tools and equipment	CPCCCA2002B	06-Oct-2020	19-Nov-2020	40	✓	✓	Second EOP could not be provided.	LC20-07873 (Apprentice) – the 4 units in question began to be delivered on 6 <sup>th</sup> October 2020. The next monthly contact with the Trainer was scheduled for November 2020.  Upon contact from the trainer and assessor on 16.11.2020, TIV was notified by the student he had left the employer and gained employment elsewhere. This was confirmed in writing via email from the student on 18.11.2020.  Upon receiving this information TIV cancelled the student as of 19.11.2020.  The Epsilon contact with TIV was terminated on 9 <sup>th</sup> October 2020.  In a case such as this, it is impossible to provide the second point of evidence.
				Use explosive power tools	CPCCCM2007B	06-Oct-2020	19-Nov-2020	40	✓		Second EOP could not be provided.	LC20-07873 (Apprentice) – the 4 units in question began to be delivered on 6 <sup>th</sup> October 2020. The next monthly contact with the Trainer was scheduled for November 2020.  Upon contact from the trainer and assessor on 16.11.2020, TIV was notified by the student he had left the employer and gained employment elsewhere. This

												<p>was confirmed in writing via email from the student on 18.11.2020.</p> <p>Upon receiving this information TIV cancelled the student as of 19.11.2020.</p> <p>The Epsilon contact with TIV was terminated on 9<sup>th</sup> October 2020.</p> <p>In a case such as this, it is impossible to provide the second point of evidence.</p>
				Plan and organise work	CPCCCM1013A	06-Oct-2020	19-Nov-2020	40	✓		Second EOP could not be provided.	<p>LC20-07873 (Apprentice) – the 4 units in question began to be delivered on 6<sup>th</sup> October 2020. The next monthly contact with the Trainer was scheduled for November 2020.</p> <p>Upon contact from the trainer and assessor on 16.11.2020, TIV was notified by the student he had left the employer and gained employment elsewhere. This was confirmed in writing via email from the student on 18.11.2020.</p> <p>Upon receiving this information TIV cancelled the student as of 19.11.2020.</p> <p>The Epsilon contact with TIV was terminated on 9<sup>th</sup> October 2020.</p> <p>In a case such as this, it is impossible to provide the second point of evidence.</p>
				Handle carpentry materials	CPCCCA2011A	06-Oct-2020	19-Nov-2020	40	✓		Second EOP could not be provided.	<p>LC20-07873 (Apprentice) – the 4 units in question began to be delivered on 6<sup>th</sup> October 2020. The next monthly contact with the Trainer was scheduled for November 2020.</p> <p>Upon contact from the trainer and assessor on 16.11.2020, TIV was notified by the student he had left the employer and gained employment elsewhere. This</p>

												<p>was confirmed in writing via email from the student on 18.11.2020.</p> <p>Upon receiving this information TIV cancelled the student as of 19.11.2020.</p> <p>The Epsilon contact with TIV was terminated on 9<sup>th</sup> October 2020.</p> <p>In a case such as this, it is impossible to provide the second point of evidence.</p>
TCA 19	P155-06908	Certificate IV in Building and Construction (Building)	CPC40110	Build thermally efficient and sustainable structures	CPCCBC4020A	24/09/2019	5/03/2020	40	✓		Second EOP could not be provided.	<p>This is withdrawn/cancelled applicant. TIV concedes that the second point of evidence of participation was not captured after the 30 days from the original point of evidence.</p>
TCA 27	P168-07359	Certificate IV in Building and Construction (Building)	CPC40110	APPLY STRUCTURAL PRINCIPLES TO RESIDENTIAL LOW-RISE CONSTRUCTIONS	CPCCBC4010B	18/03/2020	30/10/2020	40	✓		Second EOP could not be provided.	<p>This is withdrawn/cancelled applicant. TIV concedes that the second point of evidence of participation was not captured after the 30 days from the original point of evidence.</p>
TCA 38	P180-07576	Certificate IV in Building and Construction (Building)	CPC40110	Produce labour and material schedules for ordering	CPCCBC4005A	6/08/2020	11/09/2020	20		✓	Evidence sighted of student work dated 4/8/2020 which is two days prior to Activity Start Date on 6/8/2020	<p>The student has dated the work incorrectly. TIV has provided evidence of the actual date of submission of the assessment in the Learner Management System which contradicts the student's error. This system time and date stamps the submission.</p>

												<p>The date of submission was Friday, 25 September 2020, 6:26 PM</p> <p>TIV has also provided a trainer endorsed attendance sheet showing that the date the unit was delivered was <i>after</i> the incorrectly dated assessment.</p>
TCA 40	PG2- 04152	Diploma of Building and Construction (Building)	CPC50210	Contribute to the systematic management of WHS risk	BSBWHS503	19/03/2019	7/05/2019	40	✓		Second EOP could not be provided.	<p>This is withdrawn/cancelled applicant. TIV concedes that the second point of evidence of participation was not captured after the 30 days from the original point of evidence.</p>
<b>TOTAL</b>									<b>7</b>	<b>1</b>		

**Appendix E – Fee Concessions Exceptions**

Sample No.	Student ID	Program Name	Program ID	Rep. Ref. 3.5 ✓	Other information	Training Provider Comments
TCA 74	LC19-06836	Certificate III in Carpentry	CPC30211	✓	Concession card could not be provided	TIV agrees that the concession cards were not provided.
TCA 95	LC19-07089	Certificate III in Carpentry	CPC30211	✓	Concession card could not be provided	TIV agrees that the concession cards were not provided.
<b>TOTAL</b>				<b>2</b>		

## Appendix F – Fee Exceptions

Sample number	Student ID	Program Name	Program ID	Reported Hourly Client Tuition Fee Rate	Rep. Ref. 3.6 ✓	Other information	Training Provider Comments
BPA 2	PC20- 07927	Certificate III in Carpentry	CPC30211	\$4.13	✓	Statement of Fees Tuition Fee Amount of \$0.21 per hour does not match SVTS data of \$4.13 per hour.	This was an Administration error. The full cost of the student's qualification was treated as one lump sum rather than a breakdown of the charges into Tuition Fee, Application Fee and Material Fee.  Had this been the case, the Tuition Fee hourly rate would have been \$0.21.
<b>TOTAL</b>					<b>1</b>		