

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

Applicant Details			
Applicant Name	Springvale Neighbourhood House Inc	TOID	4098
Address	1-3 Lightwood Rd, Springvale 3171		
	Website	http://snh.org.au/home/index.php/en/	
Registration Contact	Melanie Virtue		
Phone Number	9548 3972	Email	manager@snh.org.au
Audit Team			
Audit Firm	Quorum QA Australia Pty Ltd	Auditor/s	Carol Macreadie
Auditor/s		Other Attendees	
Registering Body Details			
Contact Person	Julie Florence		
Phone Number	9032 1560	Email	vet.audit@edumail.vic.gov.au
Audit Details			
Type of Audit	Re-registration Audit		
Conditions Audited	3, 6, 7, 8, 9		
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, 2.4 , 2.5, 2.6, 2.7	3.1, 3.2, 3.3 , 3.4
2016 VRQA Guidelines Audited	4.3	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8 (If applicable)	
	3.1, 3.2, 3.3 , 3.4, 3.5	4.1, 4.2, 4.3 to 4.6 (If applicable)	
Audit Date/s	12-13 August 2019		
RTO Background			
<p>Springvale Neighbourhood House is a community-run, not-for-profit community house, Registered Training Organisation and Learn Local. It operates from two premises owned by Greater Dandenong City Council and delivers training from several other locations which are hired annually. The area is highly multicultural and includes a large number of newly-arrived migrants and refugees. The organisation also provides a wide range of leisure, life and pre-accredited English courses, and venues for community groups to meet.</p> <p>The RTO currently delivers five ESL accredited Qualifications which were re-accredited in 2018 and are being delivered in their new form for the first time this year. They range from a course for pre-literate learners to Certificate III level courses which are designed to be a pathway to employment or further study. The 2019 enrolment figures are:</p> <ul style="list-style-type: none"> • 10725NAT Course in Preliminary Spoken and Written English - 31 students • 10727NAT Certificate I in Spoken and Written English – 69 students • 10728NAT Certificate II in Spoken and Written English – 22 students • 10729NAT Certificate III in Spoken and Written English – 9 students • 22486VIC Certificate III in EAL (Access) – 26 students. 			

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

The organisation has a Manager, a Tutor Team Leader (who oversees the operations of the RTO) and an Administrative Team Leader (who oversees the non-RTO operations). The trainers, known as tutors, are employed on full-time or part-time contracts.

Qualifications/Units Audited ¹		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
10725NAT	Course in Preliminary Spoken and Written English	Springvale Neighbourhood House (Queens Avenue) Springvale Neighbourhood House Learning Centre (Lightwood Road) Noble Park Primary School
10729NAT	Certificate III in Spoken and Written English	Noble Park Community Centre

Interviewee(s) – Staff name and position; employer name and position	
Melanie Virtue	Manager
Laila Esrael	Trainer, 10725NAT Course in Preliminary Spoken and Written English
Kasia Malinowski	Trainer, 10729NAT Certificate III in Spoken and Written English
Mystica Perera	Tutor Team leader
Kelly Cooper	Administrative Team leader

Permanent Delivery Sites –	Yes	No
Do the RTO's permanent delivery sites match the information provided by the VRQA?	X	
If 'No', please provide amended details below:		

Third party Arrangements –	Yes	No
Do the RTO's third-party arrangements match the information provided by the VRQA?	X	
If 'No', please provide amended details below:		

¹ Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

Audit Summary - AQTF Conditions of Registration

AQTF Conditions		Compliant	Non-Compliant	Not audited
Place an X in the appropriate column				
1	Governance			X
2	Interactions with the Registering Body			X
3	Compliance with Legislation	X		
4	Insurance			X
5	Financial Management			X
6	Certification and Issuing of Qualifications and Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs	X		
8	Accuracy and Integrity of Marketing	X		
9	Transition to Training Packages/Expiry of Accredited Courses	X		
Summary of Non-Compliance ²				
CF.6.1				
The RTO does not supply a USI Privacy Statement to students.				
Strengths				

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

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

Audit Summary - AQTF Standards

AQTF Standards/Elements	Compliant	Non-Compliant	Not audited
Standard 1			
1.1 – Continuous Improvement Strategy	X		
1.2 – Training and Assessment Strategies	X		
1.3 – Training and Assessment Resources	X		
1.4 – Trainer and Assessor Competency	X		
1.5 – Assessment Strategies		X	
Standard 2			
2.1 – Meeting the Needs of Clients	X		
2.2 – Continuous Improvement of Client Services	X		
2.3 – Provision of Information to Clients	X		
2.4 – Third-Party Engagement in Training and Assessment			X
2.5 – Provision of Support Services to Clients	X		
2.6 – Learner Access to Records of Participation	X		
2.7 – Complaints and Appeals Strategy		X	
Standard 3			
3.1 – Operations Management	X		
3.2 – Continuous Improvement of Operations	X		
3.3 – Third-Party Training and/ or Assessment Services			X
3.4 – Records Management	X		
Summary of Non-Compliance³			
<p>SF.1.5.1</p> <p>10725NAT Course in Preliminary Spoken and Written English The assessment tasks do not enable the learner to demonstrate the skills and knowledge described in the unit of competency. This affects the validity and sufficiency of the evidence.</p> <p>SF.1.5.2</p> <p>10725NAT Course in Preliminary Spoken and Written English The assessment decision making is not conducted according to the rule of evidence regarding validity and the principle of assessment relating to reliability.</p>			

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

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

SF.1.5.3

10729NAT Certificate III in Spoken and Written English

The assessment tools do not provide sufficient evidence for the assessor to make a valid judgement of competency.

SF 2.7.1

The RTO does not communicate information to learners about escalation of complaints to the VRQA.

Strengths

The RTO and its staff are committed to supporting a highly diverse learner cohort, many of whom have significant disadvantage.

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

Audit Summary – 2016 VRQA Guidelines for VET Providers

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

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

4.7 – TAE – Registration requirements			X
5. Annual Declaration of Compliance			
5.1 – Annual Declaration of Compliance			X

Summary of Non-Compliance⁴

GF.4.1.1

10725NAT Course in Preliminary Spoken and Written English

The RTO's assessment strategies and practices are not consistent with the requirements of the Training Package and do not enable each student to meet the requirements for each unit of competency in which they are enrolled.

GF.4.1.2

10729NAT Certificate III in Spoken and Written English

The assessment tools do not enable each student to meet the requirements for each unit of competency in which they are enrolled.

Strengths

The RTO has been diligent in managing the supervision of a trainer who is in the process of completing the vocational Qualification required by the Training Package.

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

Detailed Findings - AQTF Conditions of Registration

CONDITION 1 - Governance	Not audited in Phase 2 audit
CONDITION 2 - Interactions with the Registering Body	Not audited in Phase 2 audit
CONDITION 3 - Compliance with Legislation	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Springvale Neighbourhood House Policy Manual 2019 Appendix 1 – details rights and relevant legislation • Learner Handbook 2019 – includes information on relevant topics • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - The RTO holds two planning days a year with the tutors and on one of them they refresh the code of practice and the rights and responsibilities in the SNH Policy Manual 2019. - At the monthly staff meetings, she chooses a topic and reviews the policy and procedure, for example, the complaints procedure. - Many students come to the Pre-Training Review with an interpreter, especially those with more limited English. They have two weeks of registration days when volunteer interpreters attend who explain to applicants about what they are signing up for, costs, timetable and about the privacy statement because they have to sign it. Vietnamese is the most common language spoken at home so the RTO has Vietnamese-speaking volunteers in the office for three days a week minimum; also Arabic speaking volunteers, Mandarin speakers and other languages. A Khmer speaker is on call. - A paid Rohingya-speaking assistant works in the Rohingya class. All other classes have a language speaker community volunteer. - Melanie has updated the Learner Handbook to include information about privacy this year. 	

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

CONDITION 4 - Insurance	Not audited in Phase 2 audit
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CONDITION 5 - Financial Management	Not audited in Phase 2 audit
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Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

CONDITION 6 - Certification and Issuing of Qualifications and Statements of Attainment		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Policy: Production and Issuing of Certificates • Records Management Policy • AQF Certificate – compliant • Statement of Attainment – compliant • 12 x student Enrolment Forms including some USI online check results • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - The RTO changed from Esystats to VETtrak in March 2019. From this year, records are stored in VETtrak, which stores them in two separate ‘cloud’ locations as a failsafe. Hard copy files are stored in locked cupboards in the SNH classroom for 7 years. The student results from previous years are in an Excel spreadsheet which is searchable by student name. The RTO plans to progressively put this data into VETtrak also. Currently data is backed up monthly to a portable drive which is kept in a locked cupboard, so data is in two places. - VETtrak reports issuance of Qualifications and Statements of Attainment - All students attend a face-to-face 1:1 Pre-Training Review and LLN assessment and that is when the USI is applied for if the student doesn’t have one. Students give verbal authorisation over the phone. 		
CF.6.1	Finding	Required Rectification(s)
	<p>The RTO does not supply a USI Privacy Statement to students.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> • There is no USI Privacy Statement in any enrolment documentation. 	<p>The RTO must supply a USI Privacy Statement to students as required by the USI Office.</p>

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

CONDITION 7 - Recognition of Qualifications Issued by other RTOs	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Learner Handbook 2019 p.10 – Mutual Recognition • Interview with Melanie Virtue, Manager – You can re-enrol in units/courses at Foundation level and also language is something you can ‘lose’ without regular practice. Therefore, they assess every applicant themselves to ensure they are placed in the most suitable course. In practice, they follow the results of the Pre-Training Review LLN assessment of the student at the time. 	

CONDITION 8 - Accuracy and Integrity of Marketing	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Website http://snh.org.au/home/index.php/en/ • Print-based marketing materials – Course and Activity Guide 2019 Term 3 • Permission to use photographic personal images – student form • Policy: Marketing • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - While there are photos of SNH users on the website, none are of students in accredited courses - The permission form is currently only used for a small number of students whose faces are in the annual report and on the organisation banners. The RTO plans to ask all students to sign the permission form in future. 	

Audit Date: 12-13 August 2019

RTO: Springvale Neighbourhood House Inc

CONDITION 9 - Transition to Training Packages/Expiry of Accredited Courses	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Policy: Accredited Course Transition Policy and Procedure – the Courses in Spoken and Written English (CSWE) courses were all re-accredited in 2018 for 2019. The policy includes reference to review of training and assessment resources, the review of trainer/assessor current competence and the teach-out procedure. • Accredited Course Transition Checklist – used by the manager and staff to monitor the transition • Website http://snh.org.au/home/index.php/en/ and print promotional materials – compliant • Learning and assessment resources – compliant • 12 x student enrolment forms – students are correctly enrolled. 	

Detailed Findings - AQTF Standards

ELEMENT 1.1 - The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Policy: Student Feedback and other surveys • AQTF learner survey forms 2018 and summary report • Internal Learner Assessment Feedback Survey 2018–2019 – conducted at the end of courses • Continuous Improvement Register – details changes made in a range of relevant areas • Professional Development Register 2016 – current – lists title, date, provider and attendees • Monthly Tutor Team Meeting minutes show discussion of relevant issues • Training and Assessment Strategies for 10729NAT Certificate III in Spoken and Written English and 10725NAT Course in Preliminary Spoken and Written English – industry consultations include: <ul style="list-style-type: none"> - Campbell Page Disability Employment Services - Bridge Employment - Australian Vietnamese Women’s Association - Reconnect Project Manager - Language and Literacy office of the City of Greater Dandenong libraries - Centrelink Multicultural Services Officer - Chisholm Skills and Jobs Centre - APM Employment, Uniting Care Life Assist, Workplace Rehabilitation Service, Alliance Aus Workers Compensation Rehabilitation Services, Max Employment, Direct Recruitment, WISE Employment, Gallagher Bassett Services, Campbell Page, Xchanging, CGU, Mission Australia 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- National Union of Workers
- Don Valley Consulting
- Australian Workers Union
- Peris Consulting
- South East Community Links.
- Interview with Melanie Virtue, Manager:
 - The industry consultations listed in the TASs took place in the last two years. Much consultation took place last year around the development of the 2019 course for the Rohingya community and in the lead-up to the implementation of the new Training Package. There is limited documentation for much of this because they were telephone conversations. There was also a lot of contact with the Vietnamese Women's Association to identify what different groups want in courses.
 - Often, they are in contact with organisations who want to refer their students across if they think SNH's courses suit the students better. Lots of interaction with referral agencies is by both phone and face-to-face, but there is little formal documentation.
 - Team leaders and tutors attend Careers Expos.
 - The RTO accesses VDC webinars and all tutors go to one location to listen to the webinars, after they finish teaching
 - The Manager reports monthly to the SNH Committee.

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>ELEMENT 1.2 - Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Learning resources and required equipment – see S.1.3 • Trainers and assessor qualifications – see S.1.4 • Industry consultation – see S.1.1 • Learning and assessment materials for selected units are appropriate and sufficient. Students do not own a resource or textbook. The tutors use a combination of commercial resources and produce and/or customise resources as appropriate for each group. • Learner Training Plans for 10725NAT Course in Preliminary Spoken and Written English and 10729NAT Certificate III in Spoken and Written English show delivery schedules. • Training and Assessment Strategy for 10725NAT Course in Preliminary Spoken and Written English <ul style="list-style-type: none"> - Entry requirements are clearly identified - The mode of delivery is face-to-face and meets learner needs and Training Package requirements - Assessment methods cover the Training Package requirements - The amount of training in the classroom is 450 or 490 hours, depending on the location /student cohort, which is the total nominal hours. The variance is due to different electives. - In addition, the tutor is available for 2.5 extra hours each teaching week for individual support or conversation practice. • Training and Assessment Strategy for 10729NAT Certificate III in Spoken and Written English <ul style="list-style-type: none"> - Entry requirements are clearly identified - The mode of delivery is face-to-face and meets learner needs and Training Package requirements - Assessment methods cover the Training Package requirements. 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- The amount of training in the classroom is 500 hours which is the total nominal hours. The new Training Package requires an extra 700 unsupervised hours (see TP pp.3, 7, 9).
- Out of Class Learning Plan for **10729NAT Certificate III in Spoken and Written English** – The tutor has developed a clear and sufficiently detailed description of how the required 700 hours will be completed over the duration of the course. The plan lists teacher-led activities (excursions, specific homework activities) and self-paced student learning (holiday diary, watch and discuss daily news, watch TV/movies in English).

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>ELEMENT 1.3 - Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Lightwood Rd Springvale site visited – 1 x classroom with tables and chairs, whiteboard, 1 x small computer room with 9 laptops, reception and office space for 4 staff, kitchenette, one toilet only. • Queens Ave site visited – 2 x classroom meeting room spaces, newly refurbished toilet facilities including a unisex wheelchair toilet, kitchenette, reception and office space for 3 staff and 3 volunteers • Noble Park Primary School – a portable classroom is used. Emails confirming permission to use a classroom for 2019 were sighted. • Licence to use 1–3 Lightwood Rd Springvale from City of Greater Dandenong Council for a peppercorn rent, includes a clause for annual renewal. • St James Hall and Springvale Reserve Board Room – emails sighted confirming a 2019 whole-year booking for these venues • Noble Park Community Centre booking form sighted • Timetables and interviews with tutors. Evidence of sufficient staffing • Learning materials for selected units were sighted and are sufficient. Students do not own a resource or textbook. The tutors use a combination of commercial resources and produce and/or customise resources as appropriate for each group. 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>ELEMENT 1.4 - Training and assessment is delivered by trainers and assessors who:</p> <ul style="list-style-type: none"> a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and b) have the relevant vocational competencies at least to the level being delivered or assessed, and c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence. 	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>NOTE: 10729NAT Certificate III in Spoken and Written English and 10725NAT Course in Preliminary Spoken and Written English are specialist Foundation courses which require trainers to have a recognised university undergraduate degree or higher or equivalent AND a recognised AQF 8 or higher TESOL Qualification or equivalent; OR a recognised university undergraduate degree or higher in education or equivalent with a TESOL major.</p> <ul style="list-style-type: none"> • Interview with Kelly Cooper, Administrative Team Leader – the RTO only requires a Working with Children Check if the trainer is at a school location or if teaching a class with onsite childcare. • Interview with Mystica Perera, Tutor Team Leader – Laila Esrael does not meet the requirement to have an AQF 8 or higher TESOL Qualification. She is currently enrolled in 10129NAT Graduate Certificate in Teaching English as an Additional Language at Holmesglen Institute, with 2 of 5 units completed. She will complete by the end of 2019. Until she is awarded the Qualification, Mystica is supervising her delivery and assessment for Springvale Neighbourhood House and will also supervise Laila’s practicum component for her studies. <p>Kasia Malinowski – trainer for 10729NAT Certificate III in Spoken and Written English</p> <ul style="list-style-type: none"> • Master of English Philology – Specialisation Teaching – University of Lotz Poland, 1992, assessed by the National Office of Overseas Skills Recognition as comparable to an Australian Bachelor degree • TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014 • TAEASS502 Design and develop assessment tools – Park Orchards Community and Learning Centre TOID: 4008, 2019 • CV and trainer skills matrix – Evidence of vocational currency 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- Evidence of professional development in competency-based training and assessment
- National Police Check

Laila Esrael – trainer for 10725NAT Course in Preliminary Spoken and Written English

- Bachelor of Arts (English Language and Literature), Sohag University, Egypt – assessed by the National Office of Overseas Skills Recognition as comparable to an Australian Bachelor degree
- 10695NAT Certificate IV in TESOL – Kangan Institute TOID: 3077, 2018
- TAE40116 Certificate IV in Training and Assessment – Chisholm Institute TOID: 0260, 2018
- CV, trainer skills matrix – Evidence of vocational currency / Evidence of professional development in competency-based training and assessment
- Working with Children Check

Mystica Perera, Tutor Team Leader and supervisor for Laila Esrael

- Master of Education (Teaching English to Speakers of Other Languages), Monash University, 2002
- TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014
- Letter of confirmation dated 09/08/2019 that Mystica has completed the training for *TAEASS502 Design and develop assessment tools*, but has not yet submitted all assessment tasks – Park Orchards Community and Learning Centre TOID: 4008
- CV, trainer skills matrix. Evidence of vocational currency
- Evidence of professional development in competency-based training and assessment
- National Police Check.

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

Vanessa Sewak– trainer for 10725NAT Course in Preliminary Spoken and Written English

- Bachelor of Commerce, University of Melbourne, 1990
- 10129NAT Graduate Certificate in Teaching English to Speakers of Other Languages (TESOL) – Holmesglen Institute TOID: 0416, 2013
- TAE40110 Certificate IV in Training and Assessment (incl. TAEASS502) – Merinda Park Merinda Park TOID: 3952, 2012
- TAELLN411 Address adult language, literacy and numeracy skills – Park Orchards Community and Learning Centre TOID: 4008, 2019
- CV, trainer skills matrix. Evidence of vocational currency
- PD log. Evidence of professional development in competency-based training and assessment
- Working with Children Check

William Lim – trainer for 10725NAT Course in Preliminary Spoken and Written English

- Bachelor of Arts (Tourism), RMIT 1998
- Cambridge ESOL Level 5 Certificate in Teaching English to speakers of Other Languages (CELTA), University of Cambridge 2010
- 10129NAT Graduate Certificate in Teaching English as an Additional Language – Holmesglen Institute TOID: 0416, 2017
- TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411 and TAEASS502B) – Plenty Training TOID: 32371, 2017
- CV, trainer skills matrix. Evidence of vocational currency has been provided
- Professional Development log. Evidence of professional development in competency-based training and assessment
- Working with Children Check

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

Bee Ling Goh – trainer for 10725NAT Course in Preliminary Spoken and Written English

- Certificate of Completion – Primary School Teacher Training (English Language Teaching), Kuala Terengganu Teachers College, Malaysia, 1996. Recognised by the Registered Schools Board of Victoria who granted her a Certificate of Registration as a Teacher in Victorian Schools, 1999
- Graduate Diploma in Teaching English to Speakers of Other Languages – Monash University TOID: 21526, 2000
- 21812VIC Course in Assessment of Informal Learning, Chisholm Institute, 2010
- TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014
- TAEASS502 Design and develop assessment tools – Park Orchards Community and Learning Centre TOID: 4008, 2019
- CV, trainer skills matrix Evidence of vocational currency
- Evidence of professional development in competency-based training and assessment
- National Police Check

<p>ELEMENT 1.5 - Assessment including Recognition of Prior Learning (RPL): a) meets the requirements of the relevant Training Package or accredited course b) is conducted in accordance with the principles of assessment and the rules of evidence c) meets workplace and, where relevant, regulatory requirements d) is systematically validated.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Interview with Melanie Virtue, Manager: Recognition of Prior Learning is not appropriate for Foundation level studies. Students' current level of LLN skills is assessed and they are placed in the appropriate course. Assessment for placement purposes overrides the RPL requirement. • Policy – Validation and Moderation • Interview with Mystica Perera, Tutor Team Leader: In previous years the owner of the Training Package (NSW AMES) supplied the assessment tools too so users were confident of their validity. However, this time, without warning, the Training Package owner has not supplied assessment tools so for the first time they must devise their own and/or adapt and validate the old ones. Their Assessment Validation Plan is that they are validating the tools for each unit before it is delivered and then will review the outcomes after assessment has been conducted. • Validation tools and completed records for some units in all Qualifications on scope including from the two Qualifications being audited: <ul style="list-style-type: none"> - Validation and moderation of assessment tasks for <i>SWELP001 Comprehend and participate in routine formal spoken exchanges</i> and <i>SWELPE002 Comprehend and participate in routine informal spoken exchanges</i> 11 June 2019 - Validation and moderation of assessment tasks for <i>SWERST001 Read a very limited range of words and very simple texts</i> 26 April 2019, 16 July 2019 <p>10725NAT Course in Preliminary Spoken and Written English</p> <ul style="list-style-type: none"> • Training and Assessment Strategy (TAS) • Assessment tools for <i>SWERST001 Read a very limited range of words and very simple texts</i> and <i>SWEWWS001 Write a limited range of words and very simple sentences</i>, including: <ul style="list-style-type: none"> - Competency Mapping 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- On one sheet – Instructions for the assessor, Instructions for the student and Requirements for satisfactory completion
 - Assessment Cover Sheet with student declaration for authentication of evidence
 - Record of Assessment Results – the now-superseded record sheet had a column to record and date one retest/resubmission. The new (not yet implemented) record sheet has a S/NYS column but no retest column.
 - Tutor's Term Plan for Term 1 – a week-by-week summary of what the tutor plans to cover. This shows that she covered a lot of personally relevant language in highly familiar contexts. However, the assessment tasks do not reflect what was taught.
 - 6 x completed student assessments for the two selected units – students are provided with feedback
 - Interview with Laila Esrael, tutor for **10725NAT Course in Preliminary Spoken and Written English:**
 - Laila has a volunteer tutor who speaks Rohingya and who assists with explaining the task, but not giving the answer. Laila could explain accurately what level of support was acceptable during assessment.
 - She does lots of task practice with students before they attempt an assessment.
 - Attendance: some students can be irregular due to family commitments and ill health
 - Supervision: Mystica attends Laila's classes to observe weekly and Laila would tell her beforehand what she planned to do. Mystica is supervising Laila for her Graduate Certificate practicum. She supplies teaching resources for Laila and advises her on assessment. Mystica selects the tasks and they do a validation before the class to make sure the tasks cover the unit. Only Laila signs the Record of Assessment Results.
 - Reasonable adjustment – Laila gives more time to students who are progressing slowly. Also, the volunteer translator helps them and they are informed about the ACFE classes they could also attend for extra class time. Laila has made a class Viber group where she communicates with them and posts some of their work. One student can only attend once a week so Laila gives her the work to take home, takes photos of whiteboard practice and puts it on Viber. She does whatever Laila sends her at home and brings it to class for Laila to correct.
- 10729NAT Certificate III in Spoken and Written English**
- Training and Assessment Strategy (TAS)
 - Attendance record – most students are very regular

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- Assessment tools for *SWELPE001 Comprehend and participate in routine formal spoken exchanges* and *SWELPE002 Comprehend and participate in routine informal spoken exchanges*, including:
 - Model answers
 - Competency Mapping
 - On one sheet – Instructions for the assessor, Instructions for the student and Requirements for satisfactory completion
 - Assessment Cover Sheet with student declaration for authentication of evidence
 - Record of Assessment Results
- 6 x completed student assessments:
 - students are assessed appropriately
 - students are provided with feedback.
- Interview with Kasia Malinowski, tutor for **10729NAT Certificate III in Spoken and Written English**:
 - She has a small group of 9 students; many have completed-secondary education or even have post-secondary qualifications. They are generally fairly independent learners and highly motivated
 - Reasonable adjustment – she has no one with special needs at the moment. If someone misses an assessment, she provides another opportunity. One student has good speaking and listening but has difficulty with reading and writing, so Kasia reads the questions out loud to her in the oral communication units.
 - If students have a problem, her first step would be to contact the Team Leader. She refers students to different services as needed, but this is not recorded anywhere. She can make a note at the bottom of the assessment sheet if it has affected assessment.
 - Kasia has changed the questions in some of the listening and speaking units this year because of the transition to the new Training Package
 - Assessment is very subjective sometimes, for example, when determining what range of grammar contributes to satisfactory performance in the speaking tasks, where the only guidance is to refer to the International Second Language Proficiency Rating (ISLPR) Level 3 descriptors. She consults other teachers if in doubt about an assessment.

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

- The units in this Qualification are long (120 hours) so she does most assessment in the last 3 weeks. She takes up work during the term to mark so she knows how they are going, but this does not generally contribute to the final judgement of competency. Sometimes she gives students a 'mock test'. If a student has an unexpectedly poor result, compared to their classroom progress, Kasia can use class work to justify a judgement of competency based not only on the final assessments.

SF.1.5.1	Finding	Required Rectification(s)
	<p>10725NAT Course in Preliminary Spoken and Written English</p> <p>The assessment tasks do not enable the learner to demonstrate the skills and knowledge described in the unit of competency. This affects the validity and sufficiency of the evidence.</p> <p><i>Evidence</i></p> <p><i>SWEWWS001 Write a limited range of words and very simple sentences</i></p> <ul style="list-style-type: none"> • The Performance Evidence requires students to write a word bank of 20 personally relevant words. The 'Requirement for satisfactory completion' does not include this requirement. • The Performance Evidence requires students to write 10 personally relevant simple sentences. The 'Requirement for satisfactory completion' states that they must construct 5 sentences using 'can' and 'can't'; and rearrange 7 personally relevant simple sentences. Task 3 provides correctly spelt words in incorrect order. Task 4 provides the sentence stems 'I can/ I can't' and a picture of an activity with the correctly spelt verb underneath. The tasks do not meet the descriptor for personal relevance. They also do not meet the unit requirement to construct sentences as distinct from rearranging provided words. • The Performance Evidence requires students to use the look, check and write strategy to spell 10 simple words correctly. While this item is on the 'Requirement for satisfactory completion', there is no task which includes observation of students using this skill. • The Performance Evidence requires students to locate subjects and verbs in 5 simple sentences. There is no task which asks students to do this. 	<p>The RTO must ensure assessment tasks are designed to provide valid and sufficient evidence for the assessor to make a judgement of competency.</p>

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p><i>SWERST001 Read a very limited range of words and very simple texts</i></p> <ul style="list-style-type: none"> The Performance Evidence in the unit requires students to read aloud 10 personally relevant sight words. This item is mapped to Tasks 1 and 2. The unit further describes this in 1.6 as ‘a very limited range’. The 24 words in Task 1 include ‘wreck’, ‘queen’, ‘flock’, ‘shack’ and ‘chuck’, which are not personally relevant and not useful as sight words. Task 2 contains 12 phonemically irregular words, which is not a requirement of the unit and contains the words ‘knife’, ‘comb’, ‘neighbour’ and ‘laugh’. When asked to identify the 10 personally relevant sight words being assessed out of the 36 words students are asked to read, the tutor could identify eight across Tasks 1 and 2 but could not explain how a student would be assessed as Satisfactory or not in the Performance Evidence item. The Performance Evidence in the unit requires students to “read aloud and show comprehension of 2 very simple texts, chosen from very simple signs with picture and text; very simple labels with picture and text; or a completed form with basic details”. Task 4 is a completed form, but there is nowhere to record that the students have read it aloud. Task 3 is a matching exercise, matching sentences such as ‘She is brushing her teeth’ with pictures. There is nowhere to record that the students have read the sentences aloud. The sentences do not meet the requirement to use signs or labels in the task. 	
<p>SF.1.5.2 Finding</p>	<p>Required Rectification(s)</p>
<p>10725NAT Course in Preliminary Spoken and Written English</p> <p>The assessment decision making is not conducted according to the rule of evidence regarding validity and the principle of assessment relating to reliability.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> <i>SWERST001 Read a very limited range of words and very simple texts</i> – Student 1 got a cross against “1.6 Recognise and pronounce a very limited range of personally relevant sight words” but was assessed as Satisfactory for the element. The tutor’s written comment said: “More practice required for the element and 	<p>The RTO must ensure that assessment decision making is conducted according to the rules of evidence and the principles of assessment.</p>

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>she will be retested”. The tutor said she would retest but didn’t plan to record the retest, just record a COM outcome.</p> <ul style="list-style-type: none"> • <i>SWEWWS001 Write a limited range of words and very simple sentences</i> – in Task 3 (matching sentences and pictures) Student 1 got 4/10 sentences wrong and was assessed NYS but was deemed COM on the Assessment Record Sheet. 	
<p>SF.1.5.3 Finding</p>	<p>Required Rectification(s)</p>
<p>10729NAT Certificate III in Spoken and Written English</p> <p>The assessment tools for <i>SWELPE001 Comprehend and participate in routine formal spoken exchanges</i> and <i>SWELPE002 Comprehend and participate in routine informal spoken exchanges</i> do not provide sufficient evidence for the assessor to make a valid judgement of competency.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> • These units both state that: “Tasks and evidence must meet the performance variables of ISLPR 3 or equivalent”. This refers to the International Second Language Proficiency Rating with the equivalent being the ACSF. • The Observation Checklists for the speaking tasks in both units do not contain sufficient observable detail in terms of language level descriptors and/or performance variables to model what an assessor might expect of a satisfactory demonstration. For example, “Use a range of grammar to convey information” in a routine informal spoken exchange needs more than a tick in a box as evidence. 	<p>The RTO must ensure that assessment tools provide sufficient evidence for the assessor to make a valid judgement of competency.</p>

2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Training and Assessment Strategies for both Qualifications pp.8-9 detail the range of supports the RTO has available • Enrolment documents for 6 x 10725NAT Course in Preliminary Spoken and Written English students and 6 x 10729NAT Certificate III in Spoken and Written English students, including: <ul style="list-style-type: none"> - Enrolment form - Pre-Training Review forms - LLN assessments, containing detail on level of assistance, final outcome and recommended level of enrolment - Learner Training Plans • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - The RTO employs a Rohingya-speaking assistant in the Rohingya class. All other classes have a language speaker community volunteer. - The RTO has Vietnamese-speaking volunteers in the office for 3 days a week minimum, also Arabic speaking volunteers, Mandarin speakers and other languages. A Khmer speaker is on call. • Interview with Mystica Perera, Tutor Team Leader: A Skills First representative advised trainers verbally during a webinar to use decimal fractions for ACSF scores and to use figures of less than 1.0 for the lowest students. They must enter these into the database to set a base level against which to measure improvement. No descriptors were provided to identify the difference between, for example, 0.4 and 0.5. • Interview with Laila Esrael, trainer for 10725NAT Course in Preliminary Spoken and Written English: <ul style="list-style-type: none"> - She does some of the LLN assessments and Mystica does some if she is teaching. - Many of her students have barriers/ problems/ extra needs to learning and she provides assistance. Currently there is no central database, student progress file or similar to record issues, actions taken or outcomes. 	
Improvement Opportunities	
<p>The RTO should consider establishing a means of recording information relevant to the needs of clients, such as issues, actions taken and outcomes, as a strategy to ensure relevant information is easily accessible if needed.</p>	

2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - A Continuous Improvement Register was compiled to centralise information for the purposes of the audit and they plan to continue with this format • Continuous Quality Improvement Plan 28/06/2019 • Continuous Improvement Register 2017–2019 – compiled to centralise information for the purposes of the audit – will continue with this format. • Policy: Student Feedback and other surveys • Industry consultation – see S.1.1 • Internal Learner Assessment Feedback Survey 2018–2019 • AQTF learner survey forms 2018 and summary report • Monthly Tutor Team Meeting minutes • SNH Staff Meeting Minutes 2017–2019, monthly – items include professional development feedback, complaints procedure, learner plans and pre training review procedures, changes to courses, reassessment • Notes from a Tutor Planning Day in January 2019 • SNH Management Team Minutes – the three members of the Management Team meet monthly and minutes are formally recorded. • Professional Development Register • Internal audit checklists 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>2.3 - Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Website http://snh.org.au/home/index.php/en/, marketing information 2019 (all students) • Learner Handbook 2019 • Policy – Enrolment of learners • Procedure Enrolment – “The Pre-Training Review will take about 40 minutes” • Pre-Training Review • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - Students attend a 1:1 PTR often with an interpreter/family member where they ensure applicants understand class content, fees, timetable and complaints. - The RTO has rolling enrolments so each Learner Training Plan may have the units in a different order. 	

2.4 - Employers and other parties who contribute to each learner’s training and assessment are engaged in the development, delivery and monitoring of training and assessment.	Not Audited
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2.5 - Learners receive training, assessment and support services that meet their individual needs.	Compliant
Evidence/Documentation Reviewed	
See S.1.2, S.2.1 and S.2.2.	

2.6 - Learners have timely access to current and accurate records of their participation and progress.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Learner Handbook – has no information on this. • Policy Manual p. 42 – Production and Issuing of Certificates – states that a copy of Statements of Attainment can be received within 5 working days. • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - The Policy Manual is on the website and staff also get this information at Professional Development days. - There is a record of participation and progress on the individual student’s Learner Training Plan in the Teacher Folder which each student signs at the end of every unit. So, students are regularly informed of their progress unless they are absent. 	

Improvement Opportunities
Although the RTO’s face-to-face mode of delivery and supportive tutor-student relationships mean that students are likely to simply ask for any records they want to view, the RTO should consider including simple and explicit information on this in the Learner Handbook.

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Policy: Complaints and Appeals • Complaints Register 2017– current – detailed and succinct summaries of complaints (always informal) and their resolution • Complaints and Appeals Procedure for Students – compliant • Informal Student Complaint Form • Formal Student Complaint Form • Learner Handbook 2019 p.8 • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> - Students often don't want to write down a complaint so the informal form was devised to assist them - Staff receive information via the Policy Manual and PD days and staff meetings - The SNH student population tend not to make complaints because of the supportive, community-based nature of the RTO - The Manager felt that a student whose complaint had not been resolved at the various stages would access the online policy and discover the escalation step, although on reflection she was less certain of this given the cohort of learners. 		
SF.2.7.1	Finding	Required Rectification(s)
	<p>The RTO does not communicate information to learners about escalation of complaints to the VRQA.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> • The Learner Handbook 2019 does not include this step. It mentions 'external assistance' but does not specify what or how. 	<p>The RTO must communicate information to learners about escalation of complaints to the VRQA.</p>

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Training and Assessment Strategies (TASs) for 10725NAT Course in Preliminary Spoken and Written English and 10729NAT Certificate III in Spoken and Written English • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> – Many students come to the Pre-Training Review with an interpreter, especially those with more limited English. They have two weeks of registration days when volunteer interpreters attend who explain to applicants about what they are signing up for, costs, timetable etc and about the privacy statement because they have to sign it. – The RTO has Vietnamese-speaking volunteers in the office for three days a week minimum; also Arabic-speaking volunteers, Mandarin speakers and other languages. A Khmer speaker is on call. This ensures students can get help to understand what is going on. • Equipment and training resources – see 1.3 • Learner Handbook 2019 • Term planning documents of two trainers • 12 x student files including enrolment forms, PTR outcomes and completed assessments • Attendance rolls • Policy: Student Fees • Policy: Student Feedback and other surveys • AQTF learner survey forms 2018 and summary report • Internal Learner Assessment Feedback Survey 2018–2019 – conducted at the end of courses • Continuous Improvement Register • Supervision of a trainer who does not currently have the required vocational qualification. See G.3.5 • Room timetables viewed 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

3.2 - The RTO uses a systematic and continuous improvement approach to the management of operations.	Compliant
<ul style="list-style-type: none"> • Springvale Neighbourhood House Strategic Plan 2015–2020 – including an Organisational Structure diagram • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> – The Manager reports monthly to the Advisory Committee, which consists of a Chair, Secretary, Treasurer, two Deputy Chairs and 8 committee members who are representatives of different groups who use the centre. • SNH Management Team Minutes. The three members of the Management Team meet monthly and minutes are formally recorded. • Internal Audit 2018 • Industry consultation – see S.1.1 • SNH Staff Meeting Minutes 2017–2019, monthly – items include professional development feedback, complaints procedure, learner plans and Pre-Training Review procedures, changes to courses, reassessment • Notes from a Tutor Planning Day in January 2019 • Continuous Improvement Register • Professional Development Register 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

3.3 - The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.	Not Audited
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3.4 - The RTO manages records to ensure their accuracy and integrity.	Compliant
<ul style="list-style-type: none"> • Policy: Records Management • 12 x student files including enrolment forms, PTR outcomes, completed assessments • 6 x Trainer files • Attendance rolls • Teacher class folders • Interview with Melanie Virtue, Manager: <ul style="list-style-type: none"> – Mystica is responsible for the maintaining documentation, Mystica authorises the data entry to VETTrak. They use a 'traffic light' system to identify whether data is ready to progress. – Every month, Melanie takes one tutor's documentation and uses a checklist to check that documentation exists and is complete. • 2 x completed Internal audit checklists sighted • All records requested were located and produced promptly. 	

Detailed Findings – 2016 VRQA Guidelines for VET Providers

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

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

**Not Audited in
Phase 2 audit**

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

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

**Not audited in
Phase 2 audit**

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

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

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

**Not audited in
Phase 2 audit**

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

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

**Not audited in
Phase 2 audit**

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>GUIDELINE 2.1 - An RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.</p> <ul style="list-style-type: none"> • A <i>third party</i> means any party that provides services on behalf of the RTO but does not include a party to a contract of employment with the RTO. • <i>Services</i> mean training, assessment, related educational or support services and/or any activities related to the recruitment of prospective students, but does not include student counselling, mediation or ICT support services. 	Not Audited
<p>GUIDELINE 2.2 – An RTO ensures that any third party delivering services on its behalf is required, under a written agreement, to cooperate with the VRQA:</p> <ul style="list-style-type: none"> a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and b) for the purposes of the conduct of any audit or monitoring of its operations. 	Not Audited
<p>GUIDELINE 2.3 – An RTO notifies the VRQA of any written agreement entered into under Guideline 2.2 for the delivery of services on its behalf:</p> <ul style="list-style-type: none"> a) within 30 calendar days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and b) within 30 calendar days of the agreement coming to an end. 	Not Audited
<p>GUIDELINE 2.4 – Information, whether disseminated directly by an RTO or by another party on its behalf, is both accurate and factual, including by:</p> <ul style="list-style-type: none"> a) clarifying whether a third party is recruiting prospective students for an RTO on its behalf; and b) distinguishing where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party. 	Not Audited

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO provides, in print or through referral to an electronic copy, current and accurate information that:</p> <ul style="list-style-type: none"> a) enables the student to make informed decisions about undertaking training with the RTO and b) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf 	Not Audited
<p>GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, including in relation to any relevant changes to existing or new third party arrangements or changes in ownership.</p>	Not Audited
<p>GUIDELINE 2.7 - An RTO has a complaints policy to manage and respond to allegations involving the conduct of:</p> <ul style="list-style-type: none"> a) the RTO, its trainers, assessors or other staff; b) a third party providing services on the RTO's behalf, its trainers, assessors or other staff; or c) a student of the RTO. 	Not Audited
<p>GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, made by an RTO or a third party providing services on the RTO's behalf.</p>	Not Audited

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>GUIDELINE 3.1 In addition to the requirements specified in Guidelines 3.2 and 3.3, an RTO’s training and assessment is only delivered only by persons who have:</p> <ul style="list-style-type: none"> a) vocational competencies at least to the level being delivered and assessed; b) current industry skills directly relevant to the training and assessment being provided; and c) current knowledge and skills in vocational training and learning that informs their training and assessment. <p>Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.</p>	<p>Compliant</p>
<p>Kasia Malinowski – trainer for 10729NAT Certificate III in Spoken and Written English</p> <ul style="list-style-type: none"> • Master of English Philology – Specialisation Teaching – University of Lotz Poland, 1992, assessed by the National Office of Overseas Skills Recognition as comparable to an Australian Bachelor degree • CV and trainer skills matrix. Evidence of vocational currency <p>Laila Esrael – trainer for 10725NAT Course in Preliminary Spoken and Written English</p> <ul style="list-style-type: none"> • Bachelor of Arts (English Language and Literature), Sohag University, Egypt, assessed by the National Office of Overseas Skills Recognition as comparable to an Australian Bachelor degree • 10695NAT Certificate IV in TESOL – Kangan Institute TOID: 3077, 2018 • CV, trainer skills matrix. Evidence of vocational currency <p>Mystica Perera – Tutor Team Leader and supervisor for Laila Esrael</p> <ul style="list-style-type: none"> • Master of Education (Teaching English to Speakers of Other Languages), Monash University, 2002 • CV, trainer skills matrix. Evidence of vocational currency 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

Vanessa Sewak – trainer for **10725NAT Course in Preliminary Spoken and Written English**

- Bachelor of Commerce, University of Melbourne, 1990
- 10129NAT Graduate Certificate in Teaching English to Speakers of Other Languages (TESOL) – Holmesglen Institute TOID: 0416, 2013
- CV, trainer skills matrix. Evidence of vocational currency

William Lim – trainer for **10725NAT Course in Preliminary Spoken and Written English**

- Bachelor of Arts (Tourism), RMIT 1998
- Cambridge ESOL Level 5 Certificate in Teaching English to speakers of Other Languages (CELTA), University of Cambridge 2010
- 10129NAT Graduate Certificate in Teaching English as an Additional Language – Holmesglen Institute TOID: 0416, 2017
- CV, trainer skills matrix. Evidence of vocational currency has been provided

Bee Ling Goh – trainer for **10725NAT Course in Preliminary Spoken and Written English**

- Certificate of Completion – Primary School Teacher Training (English Language Teaching), Kuala Terengganu Teachers College, Malaysia, 1996. Recognised by the Registered Schools Board of Victoria who granted her a Certificate of Registration as a Teacher in Victorian Schools, 1999
- Graduate Diploma in Teaching English to Speakers of Other Languages – Monash University TOID: 21526, 2000
- 21812VIC Course in Assessment of Informal Learning, Chisholm Institute, 2010
- CV, trainer skills matrix Evidence of vocational currency

GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.	Compliant
<p>Kasia Malinowski – trainer for 10729NAT Certificate III in Spoken and Written English</p> <ul style="list-style-type: none"> • TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014 • TAEASS502 Design and develop assessment tools – Park Orchards Community and Learning Centre TOID: 4008, 2019 <p>Laila Esrael – trainer for 10725NAT Course in Preliminary Spoken and Written English</p> <ul style="list-style-type: none"> • TAE40116 Certificate IV in Training and Assessment – Chisholm Institute TOID: 0260, 2018 <p>Mystica Perera – Tutor Team Leader and supervisor for Laila Esrael</p> <ul style="list-style-type: none"> • TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014 • Letter of confirmation dated 09/08/2019 that Mystica has completed the training for <i>TAEASS502 Design and develop assessment tools</i>, but has not yet submitted all assessment tasks – Park Orchards Community and Learning Centre TOID: 4008 <p>Vanessa Sewak – trainer for 10725NAT Course in Preliminary Spoken and Written English</p> <ul style="list-style-type: none"> • TAE40110 Certificate IV in Training and Assessment (incl. TAEASS502) – Merinda Park Merinda Park TOID: 3952, 2012 • TAELLN411 Address adult language, literacy and numeracy skills – Park Orchards Community and Learning Centre TOID: 4008, 2019 <p>William Lim – trainer for 10725NAT Course in Preliminary Spoken and Written English</p> <ul style="list-style-type: none"> • TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411 and TAEASS502B) – Plenty Training TOID: 32371, 2017 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

Bee Ling Goh – trainer for **10725NAT Course in Preliminary Spoken and Written English**

- TAE40110 Certificate IV in Training and Assessment (incl. TAELLN411) – Springvale Learning and Activities Centre TOID: 22231, 2014
- TAEASS502 Design and develop assessment tools - Park Orchards Community and Learning Centre TOID: 4008, 2019

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

Not Audited

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

Not Audited

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>GUIDELINE 3.5 An RTO ensures that any individual working under the supervision of a trainer:</p> <ul style="list-style-type: none"> a) holds the skill set defined in Item 4 of Schedule 1 of these Guidelines; b) has vocational competencies at least to the level being delivered and assessed; and c) has current industry skills directly relevant to the training and assessment being provided. 	<p>Compliant</p>
<p>NOTE: 10729NAT Certificate III in Spoken and Written English and 10725NAT Course in Preliminary Spoken and Written English are specialist Foundation courses which require trainers to have a recognised university undergraduate degree or higher or equivalent AND a recognised AQF 8 or higher TESOL qualification or equivalent; OR a recognised university undergraduate degree or higher in education or equivalent with a TESOL major.</p> <ul style="list-style-type: none"> • Interview with Mystica Perera, Tutor Team Leader: <ul style="list-style-type: none"> – Laila Esrael has the TAE40116 Certificate IV in Training and Assessment but she does not have an AQF 8 or higher TESOL qualification. She is currently enrolled in 10129NAT Graduate Certificate in Teaching English as an Additional Language at Holmesglen Institute, with 2 of 5 units completed. She will complete by the end of 2019. Until she is awarded the Qualification, Mystica is supervising her delivery and assessment for Springvale Neighbourhood House and will also supervise Laila’s practicum component for her studies. – Mystica meets with Laila once a week, to answer questions, provide resources for teaching, advise on assessment and advise on problems with students, for example, managing a new entrant who had very low English levels. Mystica provides the tasks and they do a validation before the class to make sure the tasks cover the unit. Mystica checks all Laila’s assessments but has not been countersigning the assessment documents. Only Laila signs the Record of Assessment Results. – Mystica attends Laila’s classes to observe weekly and Laila talks with her beforehand about what she plans to do. Mystica is supervising Laila for her Graduate Certificate practicum. • Supervision Guidelines and Records • Mystica has made notes of each meeting with Laila – sighted. • Policy: Tutor Procedures – contains a section on Tutor Supervision 	

GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.		Non-Compliant
<ul style="list-style-type: none"> • 10725NAT Course in Preliminary Spoken and Written English – Assessment tools for <i>SWERST001 Read a very limited range of words and very simple texts</i> and <i>SWEWWS001 Write a limited range of words and very simple sentences</i> • 10729NAT Certificate III in Spoken and Written English – Assessment tools for <i>SWELPE001 Comprehend and participate in routine formal spoken exchanges</i> and <i>SWELPE002 Comprehend and participate in routine informal spoken exchanges</i> 		
GF.4.1.1	Finding	Required Rectification(s)
	<p>10725NAT Course in Preliminary Spoken and Written English The RTO's assessment strategies and practices are not consistent with the requirements of the Training Package and do not enable each student to meet the requirements for each unit of competency in which they are enrolled.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> • The assessment tasks for <i>SWEWWS001 Write a limited range of words and very simple sentences</i> and <i>SWERST001 Read a very limited range of words and very simple texts</i> do not meet the requirements of the Performance Evidence. See S.1.5.1 	<p>The RTO must ensure that its assessment strategies and practices are consistent with the requirements of the Training Package and enable each student to meet the requirements for each unit of competency in which they are enrolled.</p>
GF.4.1.2	Finding	Required Rectification(s)
	<p>10729NAT Certificate III in Spoken and Written English The assessment tools do not enable each student to meet the requirements for each unit of competency in which they are enrolled.</p> <p><i>Evidence</i></p> <ul style="list-style-type: none"> • The Observation Checklists for the speaking tasks in <i>SWELPE001 Comprehend and participate in routine formal spoken exchanges</i> and <i>SWELPE002 Comprehend and participate in routine informal spoken exchanges</i> do not contain sufficient observable detail in terms of language level descriptors and/or performance variables to model what an assessor might expect of a satisfactory demonstration. See S.1.5.3 	<p>The RTO must ensure that its assessment strategies and practices enable each student to meet the requirements for each unit of competency in which they are enrolled.</p>

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

<p>GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:</p> <p>a) the existing skills, knowledge and the experience of the student; b) the mode of delivery; and c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.</p>	<p>Compliant</p>
<p>The amount of training the RTO provides to each student has been determined appropriately with regard to the existing skills, knowledge and the experience of the student and the mode of delivery.</p> <ul style="list-style-type: none"> • Training and Assessment Strategy for 10725NAT Course in Preliminary Spoken and Written English <ul style="list-style-type: none"> - Entry requirements are clearly identified - The mode of delivery is face-to-face and meets learner needs and Training Package requirements - The amount of training in the classroom is 450 or 490 hours, depending on the location /student cohort, which is the total nominal hours. The variance is due to different electives. - In addition, the tutor is available for 2.5 extra hours each teaching week for individual support or conversation practice. • Training and Assessment Strategy for 10729NAT Certificate III in Spoken and Written English <ul style="list-style-type: none"> - Entry requirements are clearly identified - The mode of delivery is face-to-face and meets learner needs and Training Package requirements - The amount of training in the classroom is 500 hours which is the total nominal hours. The new Training Package requires an extra 700 unsupervised hours (see TP pp.3, 7, 9). • Out of Class Learning Plan for 10729NAT Certificate III in Spoken and Written English – The tutor has developed a clear and sufficiently detailed description of how the required 700 hours will be completed over the duration of the course. The plan lists teacher-led activities (excursions, specific homework activities) and self-paced student learning (holiday diary, watch and discuss daily news, watch TV/movies in English). • 12 x student files including Pre-Training Review forms and LLN assessments, containing detail on level of assistance, final outcome and recommended level of enrolment • 12 x Learner Training Plans 	

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

GUIDELINE 4.3 - From 1 January 2016, to deliver any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor), an RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in Schedule 2 (and the definitions of independent validation and validation) of these Guidelines.

Not Audited

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

Not Audited

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

Not Audited

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

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

Not audited

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

Not audited

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

Audit Date: 12–13 August 2019

RTO: Springvale Neighbourhood House Inc

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

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

Not audited