



Department of Education & Training

Higher Education and Skills Group

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Ms Jania Warner
Managing Director
Warner Institute
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Dear Ms Warner

Subject: Outcome of *Victorian Training Guarantee (VTG) Performance Review*

I write regarding the VTG 2016 Performance Review (Review) conducted by Protiviti, on behalf of the Department of Education and Training (the **Department**), at Warner Institute on 6 April 2016.

In response to the recent *Review of Quality Assurance in Victoria's VET System* (Quality Review), the Victorian Government outlined¹ their commitment to "building a training system that better protects the interests of students, supports improved training quality and gives employers confidence in the skills and expertise of our workforce". The Quality Review and the Government's response places a priority on active monitoring and management of the performance of Registered Training Organisations (RTOs) to prioritise quality in determining eligibility to deliver government funded training.

Performance Reviews are one of the tools to be utilised in this new approach to the management of the VET system and are designed to monitor and assess the capabilities of RTOs to perform at a level that contributes to higher quality training services and to take further action if they are found to not be delivering quality services in key areas.

The review was conducted in accordance with Clause 10.1 of your organisation's VET Funding Contract. The objectives of the VTG Performance Review are to:

- ensure that RTOs meet the requirements of the key areas of relevant RTO Registration Standards' and
- assist with managing risks in the VTG program and its delivery arrangements.

Review process, scope of work and outcomes

The Review involved a site visit to gain an understanding of the quality of training services delivered by your organisation and interviews with students and trainers were conducted to provide a first-hand report against which the review observations could be compared.

The scope of work focused on gaining an understanding of the provision of quality training services delivered by your organisation in the following eight key areas:

- Training and Assessment Strategy,
- Industry Engagement,
- Facilities, equipment and training and assessment materials,
- Trainers' and assessors' competencies,
- Marketing practices,

¹ Message from the Hon. Steve Herbert MP, Minister for Training and Skills, *Review of Quality Assurance in Victoria's VET System: Government response* (2015)

- Pre-training Review (Learner Needs),
- Learner Information, and
- Learner protection

These key areas reflect the relevant quality standards for Registered Training Organisations. Additional information is also collected during the site visit relating, where relevant, to:

- student enrolment and course completion patterns,
- reporting in SVTS of elapsed time for courses,
- relevance of training assessment relative to the mode of training delivery,
- organisations' use of incentives or promotions to encourage enrolment,
- any brokering and sub-contracting arrangements, and
- the nature of professional development activities for RTOs' trainers and assessor

The Review outcome represents a point in time and is limited to the attributes listed above related to the specific qualifications nominated in its scope.

Review Observations

The two qualifications chosen for the Review were:

- Certificate IV in Disability, and
- Certificate IV in Aged Care

The report provided to the Department has identified some areas of inconsistency in one or both of the above qualifications. The inconsistencies were observed during the review based on your organisation's Training and Assessment Strategy (TAS), other relevant documentation and the student and trainer interviews. The table below highlights the specific areas of inconsistency noted in the report:

For course one: Certificate IV in Disability

TAS - Alignment	<p>The nominal hours required for the below unit in the training package did not match your organisation's TAS:</p> <ul style="list-style-type: none"> • <u>CHCCS411C</u> – Work effectively in the community sector (training package required 40 hours, TAS listed 0 hours as this unit is typically a credit transfer unit from the Certificate III in Disability). RTO management indicated students usually commence their training in the Certificate III in Disability and then progress to the Certificate IV in Disability. <p>The data obtained from SVTS shows that a number of students have completed this module as part of the Certificate III in Aged Care and a significant number have completed or are enrolled as part of the Certificate IV in Disability.</p>
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For course two: Certificate IV in Aged Care

TAS - Verification by Reported Data	SVTS data shows that of the students appearing as complete or nominally complete, a number of them have elapsed days shorter than the duration stated in your organisation's TAS.
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For student and trainer interviews:

Student and Trainer Interview Detailed Observations	<ul style="list-style-type: none"> • One student interviewed indicated that they did not participate in training with your RTO, • The majority of students interviewed reported that they were not asked about their learning needs or assessed as for
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	<p>suitability before commencement, and</p> <ul style="list-style-type: none">• A number of the interviews conducted indicated course durations much shorter (in hours) than stated in your organisation's TAS.
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The Department is concerned with the inconsistencies observed during the Review, in particular the student interview reports regarding your organisation's TAS duration statement for module CHCCS411C, the lack of assessment of learning needs or suitability prior to commencement and the reporting of short course duration. The Department encourages your organisation to address these key areas as a matter of priority. The Department will continue to monitor your organisation's compliance with the VET Funding Contract as described in the VTG Compliance Framework, and reserves its right to conduct further assurance activity.

This summary completes your organisation's VTG Performance Review.

Next Steps

Thank you for your organisation's cooperation during the Review.

The Department reminds your organisation of Clause 4.1 of the VET Funding Contract that requires your organisation to "deliver high quality Training Services in accordance with [this] VET Funding Contract including but not limited to the requirements of the Quality Charter". A copy of the Quality Charter is attached for information.

The Department reserves its rights under the Contract (Clause 17.2) to withhold, suspend, cancel or terminate payment of funds and the right to require refund of funds.

The Department also reminds your organisation that in accordance with Clause 2.4 of the Contract, performance at audit or review may be taken into account when considering future contractual arrangements.

I trust that you found the performance review process helpful for supporting improvement within your organisation.

You will shortly receive a message from the Department via the SVTS containing a link to the Victorian Training Guarantee Contract Compliance Audit Program Satisfaction Survey which you are encouraged to complete. The survey is an opportunity to provide feedback regarding all aspects of the review process, and importantly assists the Department in the continuous improvement of its provider performance assurance program.

Yours sincerely



David Barron
Acting Director
Funding and Quality Assurance Services
Department of Education and Training

Date: 4/5/16

Preamble

This Victorian Training Guarantee Quality Charter (the Charter) describes the Department's expectations of the RTO in the provision of key aspects of Training Services. It should be read in conjunction with the VET Funding Contract. The Charter also sets out what the RTO must do to satisfy the Department's expectations. The RTO must comply, at all times, with all parts of the Quality Charter (including this Preamble). The Charter will be updated from time to time. For the purposes of the Charter:

- Terms have the same meaning as in the VET Funding Contract; and
- a "student" means, as and when the case requires, an individual considering enrolling in or undertaking government subsidised training or an Eligible Individual.

Principle 1	Essential awareness of training entitlement
Objective	The student values and understands their training entitlement.
RTO Obligations	The RTO must communicate government funded training opportunities in a manner that is:
<i>Be ethical</i>	a. ethical, including compliant with the Statement of Expectations;
<i>Be accurate</i>	b. accurate;
<i>Be transparent</i>	c. transparent; and
<i>Be accessible</i>	d. accessible.

Principle 2	Informed choice of course and provider
Objective	The student makes an active and informed choice of both course and provider.
RTO Obligations	The RTO must, to and for each student:
<i>Inform</i>	a. provide information and support, including: <ul style="list-style-type: none"> i. how the RTO's training products, programs, pathways and delivery options will affect the individual's training outcome; and ii. all fees, costs and requirements of undertaking the program, including in accordance with the Statement of Fees;
<i>Be clear</i>	b. ensure the information provided is clear, accurate, full and relevant;
	c. ensure the support provided is reasonable and accessible; and
<i>Explain</i>	d. ensure they are made aware of how undertaking training and assessment will impact their access to further government funded training. This includes ensuring that students are aware of the full effect of any dual enrolment on the student's lifetime VTG entitlement.

Principle 3	Deliberate planning of training program
Objective	The student's training program is suitable for their individual needs.
RTO Obligations	The RTO must ensure the student's training program is suitable, where suitable means the training program:
<i>Individualise</i>	a. meets the individual's needs;
<i>Link to outcomes</i>	b. links to likely job, participation and/or further study opportunities; and
<i>Add value</i>	c. minimises duplication of the individual's existing competencies,
	as:
<i>Document</i>	d. determined and documented through a thorough and individual Pre-Training Review; and
	e. ultimately, reflected in the Training Plan.

Principle 4	High quality delivery of training and assessment
Objective	The student's training and assessment meets regulatory standards and is delivered by experts in a manner appropriate for their individual needs.
RTO obligations	The RTO must ensure:
<i>Meet RTO standards</i>	<ul style="list-style-type: none"> a. the student's training and assessment is delivered to Regulatory Standards; b. the student's training and assessment is delivered in an appropriate manner, including that: <ul style="list-style-type: none"> i. the student is provided reasonable and accessible support to facilitate their participation in training and attainment of skills; and ii. the Volume of Learning, Amount of Training, Duration, delivery modes, materials, facilities and equipment are sufficient: <ul style="list-style-type: none"> A. to meet the student's needs, including as identified through the Pre-Training Review; B. for the student to consolidate skills and produce job-ready competencies; and C. to meet the requirements and guidance in the Australian Qualifications Framework, training packages and accredited courses,
<i>Train enough</i>	
<i>Train for long enough</i>	
<i>Use the right resources</i>	<ul style="list-style-type: none"> as documented through: <ul style="list-style-type: none"> D. the Training and Assessment Strategy; and/or E. the Training Plan;
<i>Document</i>	<ul style="list-style-type: none"> c. for each learner cohort, where the Training and Assessment Strategy is structured so as to be completed in a shorter time period than the minimum described in the Australian Qualifications Framework, the RTO describes and documents within the Training and Assessment Strategy, using a rationale based on the previous skills and knowledge and the needs of learners, how a specific learner cohort: <ul style="list-style-type: none"> i. has the characteristics to achieve the required rigour and depth of training, and ii. can meet all of the competency requirements in a shorter timeframe.
<i>Be expert</i>	<ul style="list-style-type: none"> d. for each student undertaking a Practical Placement, a written agreement is in place between the RTO and the host organisation; and e. the student's training and assessment is delivered by a VTG Teacher.
Principle 5	Responsive feedback systems
Objective	The student can provide feedback on their training experience and the RTO responds and improves adequately.
RTO Obligations	The RTO must:
<i>Listen</i>	a. have and maintain a complaints and appeals process compliant with Regulatory Standards;
<i>Be open</i>	b. publish on its website its complaints and appeals process;
<i>Respond and resolve</i>	c. respond to and co-operate with any complaints mechanism or process established by the Department; and
<i>Improve</i>	d. participate in performance improvement initiatives as determined by the Department.