



GLOBAL COLLEGE AUSTRALASIA

POLICY & PROCEDURE

REGULATORY COMPLIANCE AND GOVERNANCE



RTO No: 45088 | CRICOS Code: 03564F



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Policy & Procedure – Regulatory Compliance and Governance

Purpose

GCA will ensure through a variety of measures that it has appropriate governance over to ensure compliance with the Vocational Education and Training (VET) Quality Framework, the Education Services for Overseas Students Act (ESOS) 2000 and the National Code of Practice for Providers of Education and Training to Overseas Students ('the National Code') 2018; and any other regulatory/accreditation authorities appropriate to programs on Scope of Registration [award, non-award, skills competency and single units].

Australian Skills Quality Authority (ASQA) is the regulatory body for delivery of training by providers that are registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS), including those delivering English Language Intensive Courses to Overseas Students (ELICOS).

Standards for Registered Training Organisations (RTOs) 2015 are made under the *National Vocational Education and Training Regulator Act 2011* (the Act), including Amendment 2019 (No. 1).

The 8 Standards as per the [Standards for Registered Training Organisations \(RTOs\) 2015 \(legislation.gov.au\)](http://legislation.gov.au) are organised as follows:

Training and assessment

- Standard 1: The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meets the requirements of training packages and VET accredited courses.
- Standard 2: The operations of RTO are quality assured.
- Standard 3: RTO issues, maintains and accepts AQF certification documentation in accordance with these Standards and provides access to learner records.

Obligations to learners and clients

- Standard 4: Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients.
- Standard 5: Each learner is properly informed and protected.
- Standard 6: Complaints and appeals are recorded, acknowledged and dealt with fairly, efficiently and effectively.

GCA governance and administration

- Standard 7: RTO has effective governance and administration arrangements in place.
- Standard 8: RTO cooperates with the VET Regulator and is legally compliant at all times

ASQA's [Users' guide to Standards for RTOs 2015 | Australian Skills Quality Authority \(ASQA\)](#) emphasises the importance of GCA practice to the quality of the student experience and follows the five phases (Chapters 1 to 5) of the student's journey, and one chapter (Chapter 6) about regulatory compliance and governance.

- Chapter 1: Marketing and recruitment
- Chapter 2: Enrolment
- Chapter 3: Support and progression
- Chapter 4: Training and assessment
- Chapter 5: Completion



- Chapter 6: Regulatory compliance and governance, references a number of Standards relating to regulatory compliance and governance practice. See below:
 - Clause 7.1 – Authorised officers
 - Clause 7.2 – Assessment of financial viability risk
 - Clauses 2.1 and 8.4 to 8.6 – Compliance and reporting
 - Clauses 2.3, 2.4 and 8.3 – Recording, monitoring and reporting third-party arrangements
 - Clause 7.4 – Hold public liability insurance
 - Clause 7.5 – Provide accurate information about performance and governance
 - Clauses 8.1 and 8.2 – Provide requested information to ASQA

GCA has documented Policy, and where applicable, Procedures which align with all phases of the Student Journey, and with regulatory compliance and governance.

This Policy and Procedure, and related policy and procedures primarily addresses RTO Chapter 6 – Regulatory compliance and governance, with some reference to related ESOS National Code Standards, particularly Standard 11 – Additional registration requirements.

The Chief Executive Officer [CEO]/delegate has overall responsibility and will work in close coordination with all staff who implement this Policy, and related Procedures and ensure that all are aware of this Policy and Procedure.

Scope

This Policy and Procedure outlines RTO’s commitment to ensuring it has the capacity, infrastructure and facilities to deliver and assess all courses, qualifications and units of competency listed on its Scope of Registration on the National Register and any other programs approved to be delivered. See *ATTACHMENT A: About RTO*.

Definitions

1. AQF	2. Australian Qualifications Framework (AQF) is the framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory ministerial council with responsibility for higher education.
3. AQF qualification	4. This refers to an AQF qualification type endorsed in a training package or accredited in a VET accredited course.
5. ASQA	6. The Australian Skills Quality Authority (ASQA) is the national regulator for Australia’s vocational education and training sector. ASQA regulates courses and training providers to ensure nationally approved quality standards are met.
7. AVETMISS	8. AVETMISS stands for the Australian Vocational Education and Training Management Information Statistical Standard. It is a national data standard which ensures the consistency and accuracy of vocational education and training (VET) information and covers the national VET data collections. The National Centre for Vocational Education Research (NCVER) is the custodian of the Standard, which forms the basis for collecting data for the national VET provider collection.
9. Compliance	10. Compliance is a legal requirement to meet regulatory requirements, industry standards and legislative requirements. VET providers can set standards and meet regulatory requirements is by developing and implementing quality assurance processes. Quality assurance processes help to ensure that providers are delivering training that meets the needs of their students and the industry. (Operate from a position of compliance. – VET Sector)



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11. CRICOS	12. The Commonwealth Register of Institutions and Courses for Overseas Students (<i>CRICOS</i>) is a register of Australian education providers that recruit, enrol and teach overseas students. Registration on <i>CRICOS</i> allows providers to offer courses to overseas students studying in Australia on student visas.
13. DoHA	14. Department of Home Affairs Home Affairs brings together Australia’s federal law enforcement, national and transport security, criminal justice, emergency management, multicultural affairs, settlement services and immigration and border-related functions, working together to keep Australia safe. https://www.homeaffairs.gov.au/
15. ESOS Legislative Framework	16. The Education Services for Overseas Students Act 2000 , or ESOS Act, establishes legislative requirements and standards for the quality assurance of education and training institutions offering courses to international students who are in Australia on a student visa. The ESOS legislative framework (internationaleducation.gov.au)
17. Governance	18. The processes by which GCA is controlled and held to account. Governance encompasses the system by which an organisation is controlled and operates, and the mechanisms by which it, and its people, are held to account. Ethics, risk management, compliance and administration are all elements of governance (What is governance? (governanceinstitute.com.au))
19. PRISMS	20. Provider Registration and International Student Management System (PRISMS). Through PRISMS, certain Australian Government agencies can monitor student compliance with visa conditions and provider compliance with the <i>Education Services for Overseas Students Act 2000</i> (ESOS Act).
21. Registered Training Organisation [RTO]	22. Registered Training Organisation (RTO) – registered by the VET Regulator, where that registration is then entered on the National Register.
23. Regulation	24. Regulation includes any laws or other government-endorsed ‘rules’ where there is an expectation of compliance. In Australia, regulation is made at the federal level as well as by the states and territories, in the form of legislation and subordinate legislation and at a local government level as regulations and by-laws. (https://www.pmc.gov.au/regulation)
25. Regulatory body	26. A <i>regulatory body</i> is a public organization or government <i>agency</i> that is set up to exercise a <i>regulatory</i> function. ... A <i>regulatory body</i> might also be referred to as a <i>regulatory agency</i> , a <i>regulatory authority</i> or a regulator.
27. Regulatory Compliance - RTOs	28. The <i>Standards for Registered Training Organisations 2015</i> (the Standards) and clauses relevant to registered training organisations’ (RTOs) regulatory compliance, reporting and governance practice underpin the good management of RTOs—and, as a result, their effective functioning and sustainability as businesses.
29. Risk Management	30. Risk management helps protect business from negative events. Assess and manage risk business.gov.au
31. Scope of Registration	32. Scope of Registration (Scope) means the training products for which an GCA is registered to issue AQF certification documentation.
33. Self-assurance	34. Self-assurance is when training providers have their own systems and practices to systematically monitor, evaluate and continually improve their training outcomes and performance against the Standards (Self-assurance Australian Skills Quality Authority (ASQA))





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35. Standards	36. Standards (generic definition) are voluntary documents that set out specifications, procedures and guidelines that aim to ensure products, services, and systems are safe, consistent, and reliable.
37. Standards for VET Accredited Courses	38. This Standards are made under subsection 188(1) of the National Vocational Education and Training Regulator Act 2011 or the equivalent requirements adopted by a non-referring State. VET Quality Framework Australian Skills Quality Authority (ASQA)
39. Standard Operating Procedure [SOP]	40. A standard operating procedure (SOP) is a set of written instructions that describes the step-by-step process that must be taken to properly perform a routine activity. SOPs should be followed the exact same way every time to guarantee that the organization remains consistent and in compliance with industry regulations and business standards. Standard operating procedures provide the policies, processes and standards needed for the organization to succeed. They can benefit a business by reducing errors, increasing efficiencies and profitability, creating a safe work environment and producing guidelines for how to resolve issues and overcome obstacles.
41. Training Package	42. Refers to the components of a training package endorsed by the Industry and Skills Councils or its delegate in accordance with the Standards for Training Packages. These endorsed components comprise the units of competency and all associated requirements an RTO must provide to learners, to meet the Standards.
43. Tuition Protection Scheme	44. The Tuition Protection Service (TPS) is an initiative of the Australian Government to assist international students whose education providers are unable to fully deliver their course of study. The TPS ensures that international students are able to either: complete their studies in another course or with another education provider or receive a refund of their unspent tuition fees.
45. Unit of competency	46. This is the specification of the standards of performance required in the workplace as defined in a training package.
47. VET	48. Vocational Education and Training. A VET accredited course means a course accredited by the VET regulator in accordance with the Standards for VET Accredited Courses.
49. VET Regulator	50. Refers to the National VET Regulator; and a body of a non-referring State that is responsible for the kinds of matters dealt with under the VET legislation for that State. 51. ASQA regulates RTOs in Western Australia that offer courses to overseas students.
52. VET Quality Framework	53. The VET Quality Framework comprises: <ul style="list-style-type: none"> • The Standards for Registered Training Organisations • The Australian Qualifications Framework • The Fit and Proper Person Requirements • The Financial Viability Risk Assessment Requirements • The Data Provision Requirements. 54. VET Quality Framework Australian Skills Quality Authority (ASQA)
55. VETTRAK	56. VETTRAK is a Student Management System that enables compliance for Australian RTOs including AVETMISS, USI (Unique Student Identifier), CRICOS requirements for international providers.



Policy

This Policy and Procedure is informed by ASQA, *Users' guide to the Standards for Registered Training Organisations (RTOs) 2015*. Version 2.2 October 2019.¹

1. Authorised Officers (Clause 7.1)

GCA ensures that its executive officers or high managerial agent: are vested with sufficient authority to ensure GCA complies with RTO Standards at all times meet each of the relevant criteria specified in the Standards for Registered Training Organisations (RTOs) 2015, Schedule 3 - *Fit and Proper Person Requirement*. (Clause 7.1)

A 'fit and proper person' declaration, including any relevant disclosures, is provided in accordance with ASQA's requirements, for example when:

- Renewing registration as an RTO
- A new manager or agent (on either an employment, contract or volunteer basis) is engaged
- A person procures more than 15 per cent of the RTO's ownership (either directly or through their ownership of another corporation).

In the annual declaration on compliance, GCA will also be required to testify that:

- All executive officers and high managerial agents have been reported to ASQA
- That they continue to meet the Fit and Proper Person Requirements.

1.2. GCA Authorised Officers

1.2.1 GCA Management:

- a. Has established and maintains appropriate governance structures which includes an executive management team and/or academic management. The role of this management team is to oversee the effective governance and compliance of GCA, and particular roles and responsibilities are outlined in *Attachment B: GCA Teams*
- b. Ensures senior officers, directors or substantial shareholders who are in a position to influence the management of the organisation satisfy the 'Fit and Proper Person Requirements' as per ASQA.
- c. Will provide information to the RTO's registering body, Australian Skills Quality Authority (ASQA) about significant changes to its operations as soon as it becomes aware of them and will advise ASQA in writing of any significant change to its ownership prior to the change taking effect.
- d. Will advise ASQA of any prospective or actual change to high managerial agents as soon as practical prior to the change taking effect or within 10 working days of the change taking effect where the change cannot be determined until it takes effect. Information on new owners or high managerial agents will be provided to ASQA for the purpose of making an assessment under the ESOS Act.

1.2.2 GCA continuous improvement and quality assurance approach:

- a. Uses a systematic and continuous improvement approach to management of its operations.
- b. Ensures appropriate mechanisms are in place to collect regular, valid and reliable feedback from stakeholders such as students, staff, preceptors and workplace supervisors [where relevant].
- c. Ensures appropriate mechanisms are in place to collate and analyse the feedback collected and ensure it is acted upon to bring about improvements to the organisation.
- d. Used feedback to bring about improvement to GCA training, assessment and client services as well as on the management of its operations.

¹ <https://www.asqa.gov.au/standards/chapter-6>



- d. Ensures that the experiences of its trainers and assessors are used to inform senior decision making.

1.2.3 GCA Staff Management

- a. GCA ensures that training and assessment is delivered by trainers and assessors who are appropriately qualified, appropriately experienced and who maintain currency and relevance in the area in which they train and/or assess, in line with the requirements of the VET Quality Framework, relevant Training Packages and/or Accredited Courses and relevant licensing and regulatory guidelines. Verified or certified evidence of this will be kept in each trainer/assessor's staff file.
- b. ASQA requires registered training organisations (RTOs) to comply with all relevant state, territory and commonwealth legislation, for example, trainer and assessor Police Checks, and Working with Children Checks.
- c. GCA ensures that if a trainer/assessor is working with a student under the age of 18 years, the trainer/assessor has undergone a Working with Children's Check
- d. GCA does not admit any student under the age of 18.

Assessment of financial viability risk (Clause 7.2)

An RTO is required to present an acceptable level of financial viability risk at all times.

ASQA assesses each RTO's financial viability risk to evaluate the likelihood of business continuity and the RTO's capacity to achieve quality outcomes, as outlined in the Financial Viability Risk Assessment Requirements 2011. ASQA may require an RTO to undergo a financial viability risk assessment at any time.

Evidence that shows compliance will vary depending on the structure of the organisation and its business, for example, a small RTO that enrolls students on pay-as-you-go, fee-for-service arrangements and receives no government funding would have low financial viability risk exposure. This RTO would be likely to be allowed a high level of tolerance by ASQA.

ASQA may require GCA to provide evidence of acceptable financial viability risk at renewal of registration, or at any other time. This evidence may include:

- financial statements and tax records
- business plans or projections
- Australian Securities and Investments Commission (ASIC) reports
- dependency statements
- independent financial assessments or audit opinions
- government contracts.

2.1 GCA Financial Management

2.1.1 RTO:

- a. Maintains a financial management system, which includes systems for managing student fee payments and student refunds.
- b. GCA will:
 - i. Submit to an assessment of financial viability by a qualified, independent financial auditor nominated by ASQA at any time during its registration period if requested to do so by ASQA.
 - ii. Pay the relevant amount to the Tuition Protection Scheme (TPS) to protect fees paid by international students, as well as abiding by the ESOS requirements regarding fees paid in advance and as detailed in our Related Policies in regard to fees, charges and refund policy.



- c. In order to protect fees paid in advance GCA will obtain appropriate tuition fee insurance.

3. Compliance and reporting (Clauses 2.1 and 8.4 to 8.6)

GCA ensures it complies with these Standards at all times, including where services are being delivered on its behalf. This applies to all operations of an RTO within its Scope of Registration (Scope). (Clause 2.1)

GCA provides an annual declaration on compliance with these Standards to the VET Regulator and in particular whether it:

- a) currently meets the requirements of the Standards across all its Scope and has met the requirements of the Standards for all AQF certification documentation it has issued in the previous 12 months
- b) has training and assessment strategies and practices in place that ensure that all current and prospective learners will be trained and assessed in accordance with the requirements of the Standards. (Clause 8.4)

GCA complies with Commonwealth, state and territory legislation and regulatory requirements relevant to its operations. (Clause 8.5)

GCA ensures its staff and clients are informed of any changes to legislative and regulatory requirements that affect the services delivered. (Clause 8.6)

3.1 GCA compliance with legislation and guidelines

3.1.1 RTO:

- a. Ensures it complies with the VET Quality Framework, the ESOS Act 2000, and the National Code of Practice for Providers of Education and Training to Overseas Students 2007 and any national guidelines as set by the National Skills Standards Council from time to time. This applies to all operations within the organisation's Scope of Registration (Scope) as listed on training.gov.au.
- b. Compliance is ensured through a variety of methods including having detailed policies and procedures, regular internal audits, monitoring of compliance obligations, continuous analysis of performance and improvement, and assigning compliance responsibilities to relevant roles as appropriate.
- c. Ensures it complies with relevant Commonwealth, State or Territory legislation and regulatory requirements that are relevant to its operations and its Scope. Legislation is monitored using the legislation register.
- d. Ensures that its staff and clients are fully informed of the legislative and regulatory requirements that affect their duties or participation in vocational education and training. This information will be communicated through the Staff and Student Codes of Conduct, staff inductions and staff position descriptions and in the iterations of the Student Handbook.
- e. Hold appropriate insurances for public liability throughout its registration period that are suitable to its size and scope of operation.
- f. Allow government departments or their agents, access to training records, delivery locations and staff for auditing purposes when required, in line with privacy and confidentiality principles, and in line with the requirements of ASQA.
- g. Collects and reports data on the Quality Indicators as required by ASQA. Data will be reported by 30 June each year.
- h. Will meet the requirements for the storage and reporting of national unique student identifiers (USI) as required by ASQA.

4. Recording, monitoring and reporting third-party arrangements (Clauses 2.3, 2.4 and 8.3)

GCA 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. (Clause 2.3).



GCA has sufficient strategies and resources to systematically monitor any services delivered on its behalf and uses these to ensure that the services delivered comply with these Standards at all times. (Clause 2.4)

GCA notifies the Regulator:

- a) of any written agreement entered into under clause 2.3 for the delivery of services on its behalf within 30 calendar days of that 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. (Clause 8.3)

4.1 GCA third-party arrangements

4.1.1 RTO

- a. Complies with GCA regulatory requirements and ESOS standards in relation to Education Agents (ESOS Standard 4: Education Agents)
- b. In compliance with GCA Clause 4.1 e) – makes clear where a third party is recruiting prospective learners on behalf of RTO.
- c. GCA publishes details of its Education Agents on its website
- d. Monitors training and assessment services provided on its behalf (if applicable) through established procedures by partnership agreement or other, to ensure that the services provided comply with all aspects of the VET Quality Framework
- e. Allow government departments or their agents, access to training records, delivery locations and staff for auditing purposes when required, in line with privacy and confidentiality principles, and in line with the requirements of ASQA. *See section 3.1.1 f of this Policy.*

5. Hold public liability insurance (Clause 7.4)

GCA holds public liability insurance that covers the scope of its operations throughout its registration period.

GCA must hold public liability insurance to cover all training and/or assessment activities it provides as an RTO. (Clause 7.4)

RTOs can retain evidence that they hold public liability insurance by keeping a copy of a certificate of currency or similar. Quotes and invoices are not sufficient evidence to prove that insurance is actually in place. The evidence provided must:

- identify that GCA is covered by the policy
- either confirm that training and assessment activities are covered, or that there are no restrictions on the activities covered.

5.1 GCA public liability insurance

5.1.1 GCA will:

- a. Hold appropriate insurances for public liability throughout its registration period that are suitable to its size and scope of operation. *See also Section 3.1.1 e of this Policy.*

6. Provide accurate information about performance and governance (Clause 7.5)

GCA provides accurate and current information on its performance and governance consistent with the Data Provision Requirements as updated from time to time.

The Data Provision Requirements outline information that an GCA is required to submit:



- Australian Vocational Education and Training Management Information Statistical Standard (AVETMISS) data
- Quality indicator data.

Quality indicator data provides information for RTOs about their students' experience of their services and can be used to continuously improve services for students and employers.

AVETMISS is a national VET data standard that ensures the consistent and accurate capture and reporting of VET information about students, providers, courses and training outcomes. The National Centre for Vocational Education Research (NCVER) is the custodian of the Standard, which forms the basis for collecting data for the national VET provider collection. Information on AVETMISS is available from the NCVER website.

GCA must obtain and report full AVETMISS data for all learners, except for specified training that is exempt under the *National VET Provider Collection Data Requirements Policy*.

Most student management systems, for example VETTRAK, can record and report AVETMISS data without additional entry.

National VET provider collection data—due by the end of February each year - RTOs must retain evidence that they have submitted full AVETMISS data for all learners as required in the *National VET Provider Collection Data Requirements Policy*. This is due annually by the end of February for the previous calendar year.

Quality indicator data—due to ASQA in June each year/quality surveys - RTOs must retain evidence that they have collected and/or submitted quality indicator data using the required learner engagement, and employer satisfaction (if applicable) questionnaires. This is due to ASQA annually by 30 June for the previous calendar year.

6.1 GCA provides accurate information about performance and governance

6.1.1 RTO:

- Maintains a financial management system, which includes systems for managing student fee payments and student refunds.
- Maintains a student management system and appropriate record-keeping systems which are suitable to the size and scope of its operations, and which enable the organisation to provide compliant data to ASQA as required. The Student Management System in use is VETTRAK.
- Will cooperate with ASQA's requirements in relation to retention, archiving, retrieval and transfer of records in line with the directions provided by ASQA which are currently outlined, in the 'General Directions: Retention requirements for completed assessment items' ([General Directions | Australian Skills Quality Authority \(ASQA\)](#))
- Provide accurate and timely data, relevant to measures of its performance, to ASQA as required.
- Keeps records of competency, unit and course completion for a period of at least thirty (30) years after completion on the student management system.

7. Provide requested information to ASQA (Clauses 8.1 and 8.2)

GCA and any third parties delivering services on its behalf must cooperate with ASQA in responding to requests for information, undergoing audits and managing records. The information GCA and third parties provide to ASQA must be accurate, truthful and authentic. Any documentation provided at audit must be an accurate representation of the RTO's practices.

GCA cooperates with the VET Regulator:

- by providing accurate and truthful responses to information requests from the VET Regulator relevant to the RTO's registration
- in the conduct of audits and the monitoring of its operations



- by providing quality/performance indicator data
- by providing information about substantial changes to its operations or any event that would significantly affect the RTO's ability to comply with these standards within 90 calendar days of the change occurring
- by providing information about significant changes to its ownership within 90 calendar days of the change occurring
- in the retention, archiving, retrieval and transfer of records. (Clause 8.1)

GCA ensures that any third-party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:

- by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services
- in the conduct of audits and the monitoring of its operations. (Clause 8.2)

GCA must notify ASQA within 90 days of the following:

- changes to executive officers or high managerial agents
- changes to financial administration status (e.g. liquidators being appointed)
- changes to legal name or type of legal entity
- changes to ownership, directorship or control (including changes to parent entities)
- significant mergers or associations with other RTOs
- registration (or application) with other education regulators (e.g. higher education provider with the Tertiary Education Quality Standards Agency)
- anything that may affect the fit and proper person status of an influential representative of the RTO
- changes to any fundamental funding/revenue source (e.g. access to or loss of government funding contract allocation)
- changes to the RTO's business strategy (e.g. move to online delivery, assessment-only delivery, offshore delivery)
- delivery to apprentices or trainees employed under a training contract
- any other significant event.

As outlined in relation to clauses 1.8 to 1.12, GCA must securely retain all completed assessment items relating to each unit or module for six months from the date the decision on competence for the individual unit or module was made. If GCA can't retain the actual item (for example, construction projects or perishable items), retain evidence, such as photographs, that the standard of the item or work completed justifies the assessment outcome. COMPLETED ASSESSMENT ITEMS, SUCH AS ASSIGNMENTS, SHOULD NOT BE HANDED BACK TO STUDENTS UNTIL THE SIX-MONTH PERIOD HAS EXPIRED, ALTHOUGH GCA CAN PROVIDE THEM WITH A COPY.

As outlined in relation to clause 7.5, RTO must collect and report on a range of data about their business and operations, including:

- AVETMISS-compliant Total VET Activity data
- Quality indicator data.

If requested, GCA must provide ASQA with:

- business registration records, for example, ASIC reports
- information demonstrating that the organisation satisfies the Financial Viability Risk Assessment Requirements



- information demonstrating relevant people associated with the organisation satisfy the *Fit and Proper Person Requirements*
- information on strategies, resources and other materials used to conduct training and assessment
- documents demonstrating trainer and assessor credentials
- information about delivery operations such as modes, venues, funding, student types and activity conducted
- evidence about record management systems
- public liability insurance coverage
- the names of current or past students, who may be surveyed about satisfaction levels
- any other information required to demonstrate compliance with the VET Quality Framework.

Should GCA stop operating as an RTO, it will need to transfer sufficient digital records to ASQA to confirm the training and assessment each student has completed.

If GCA uses third parties to provide services, they must ensure they cooperate with ASQA during any audits and by retaining and providing records or other information. GCA is responsible for ensuring any third party meets these requirements. The written agreements with any third parties must specify that they are required to cooperate with ASQA by providing information where requested and in the conduct of audits.

At audit, ASQA may seek evidence to verify that their information and practices are aligned.

ASQA may interview students, trainers and assessors and third parties to validate information.

7.1 GCA provision of requested information to ASQA

7.1.1 GCA will:

- a. Provide requested information to ASQA. See also, *Policy and Procedure – Provide requested information to ASQA*
- b. Comply with all compliance and reporting requirements (as per RTO Clauses 2.1 and 8.4 to 8.6). See *Section 3.1 of this Policy*.
- c. Comply with requirements to provide accurate information about performance and governance (as per RTO Clause 7.5). See *Section 6.1 of this Policy*.
- d. In addition to all areas covered by this Policy, GCA maintains a Compliance Management Schedule (Current 2019-2024) as amended from time to time. For example, audit readiness at all times: See Section 7.1.2 below for examples of operations that must be audit ready.

7.1.2 GCA maintains audit readiness (ASQA) – See also *Policy and Procedure– Internal Audit*

A: *Risk Management – See Policy and Procedure– Risk Management*

- a. Risk management is informed by Risk Management Principles based on *ISO3100:2018 Risk Management Guidelines*². That is (in brief) risk management considers:
 - Integration,
 - Structure and comprehensiveness,
 - Customisation,
 - Inclusiveness,
 - Dynamism,
 - Best available information,

² Adapted from: PECB Whitepaper ISO 31000:2018 *Risk Management Guidelines*, www.pecb.com



- Human and cultural factors, and
- Continual improvement

B: *Training and Assessment*

- a. Employs skilled trainers and assessors (as per RTOS 1.3 to 1.16)
- b. Maintains a comprehensive Training and Assessment Strategy for each qualification or unit of competency it delivers, ensuring these are developed in consultation with industry, are consistent with its own capacity to provide training and assessment and outlines the appropriate staff, facilities, equipment and other resources required.
- c. Maintains training and assessment facilities, equipment and resources for all units of competency necessary for the award of all qualifications on GCA's Scope.
- d. Maintains dedicated and operational educational facilities which are appropriate to the number of enrolled students, and which meet the appropriate building, fire safety, occupational health and safety, and other building codes for educational premises. Facilities include classrooms, educational and computer technology support, study areas, trainer office space, student recreational areas, and staff facilities.
- e. Ensures assessment meets the requirements of the relevant Training Package or Accredited Course the requirements of VET Quality Framework as well as workplace and regulatory requirements.
- f. Ensure assessment is systematically validated and moderated and that all assessors participate regularly in moderation and validation. Moderation and validation is planned annually as outlined on the Annual Schedule.
- g. Ensures that where employers and other parties contribute to each student's training and assessment, that they are engaged in the development, delivery and monitoring of training and assessment through third party reports, contribution to training plan development
- h. Monitors training and assessment services provided on its behalf through established procedures by partnership agreement or other, to ensure services provided comply with all aspects of the VET Quality Framework.
- i. Manages the transition from superseded Training Packages and accredited courses in accordance with ASQA's guidelines related to Clauses 1.26-1.27. See also *Policy and Procedure – Manage transition from superseded training products*
- j. Appropriately manage the transition from expired accredited courses so that it delivers only currently accredited courses in line with ASQA's fact sheet about transition and teach-outs.

C: *Marketing and Pre-enrolment information*

- a. In relation to information provided to persons seeking to enrol, GCA will provide accurate, honest and ethical marketing information which is consistent with its Scope and Marketing Policy and related procedures.

D: *Student support and welfare services*

- a. The approach by which GCA will provide individual identification of needs and support to each student is outlined in GCA Policy and Procedure: *Student Support Services; and Identifying and Supporting Student Learning Needs; and Special Needs and Disability.*
- b. Through the implementation of these policies GCA establishes the needs of students prior to and throughout enrolment and delivers services to meet those needs.
- c. GCA continuously improves student services by collecting, analysing and acting on relevant data obtained through student and learner engagement surveys and other feedback mechanisms.

E: *Issuing qualifications and statements of attainment*



- a. GCA will issue to persons whom it has assessed as competent in accordance with the requirements of a Training Package or accredited course, a qualification (Testamur/ certificate) or Statement of Attainment (as appropriate) and in accordance with the qualifications and statements issuing policy and related procedures.
- b. Ratification of results [competency] will be undertaken in accordance with academic governance Teams Terms of Reference prior to publication of results at the end of a semester [two terms] and prior to the issuance of Certification.

F. *Recognition of qualifications and statements*

- a. GCA will recognise the qualifications and Statements of Attainment issued by any other Registered Training Organisation in accordance with its National Recognition and Credit Transfer Policy and related procedures.

G. *Development and revision of GCA policy documents*

- a. GCA will develop new policy as applicable and review existing policy and procedure [and related Standard Operating Procedures] as required, in relation to changes to government policy or legislation, changes to operations or business direction, or as directed external regulatory authorities.
- b. The general phases in documenting policy as per a. above may include the following:
 1. Needs analysis for new policy or revision of existing policy
 2. Delegate policy development/revision to appropriate person and/or team
 3. Data gathering and research (may include consultation with policy area experts)
 4. Draft policy documents
 5. Circulate draft document to stakeholders for feedback
 6. Make revisions and amendments based on stakeholder feedback
 7. Circulate redrafted policy document (may need several redrafts)
 8. Policy approval
 9. Communication/dissemination
 10. Implementation
 11. Maintenance and review (yearly or sooner if applicable)

H. *Self-assurance*

- a. GCA has implemented a Self-assurance approach to ensure systems have agency to enable critical examination of self-performance against all requisite compliance Standards related to meeting VET Quality Framework outcomes and ESOS Legislation Framework requirements.

I. *GCA Compliance Plan*

- a. *GCA Compliance Plan* comprises comprehensive risk assessment, quality and compliance planning and implementation strategy to ensure regulatory compliance and governance including compliance with clauses including 1.1, 1.3, 1.6, 1.8, 1.13 and 1.16 of the Standards for Registered Training Organisations (RTOs) 2015. Specific guidelines/standards /resources utilised in ensuring compliance at GCA are those relating to NVR: <https://www.legislation.gov.au/Details/C2011A00012>, and RTO Standards: <https://www.asqa.gov.au/standards>
- b. The Compliance Plan is dynamic and will be reviewed and adjusted in accordance with any specified changes, and when necessary and provides following information to ensure operational and systemic risks are identified and addressed in a timely manner:
 - Key objectives



- Key strategies
- Strategy and planned activity and responsible staff
- Addressing non-compliances
- Risk assessment, quality and compliance management schedule
- Evidence of implementation.

8. Additional Registration Requirements (ESOS Standard 11) ³

Registered providers must meet the requirements for Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registration. Only full-time courses can be registered on CRICOS.

Registered providers must also ensure the ESOS agency approves and has up-to-date information on specific aspects of the registered provider's operations and any registered courses. Registered providers must:

- seek approval from the ESOS agency or designated State authority to register only a full-time course.
- submit any proposed changes to the registration of courses to its ESOS agency for approval at least 30 days prior to the date the changes will commence; and
- undertake an independent external audit during their period of CRICOS registration to inform their re-registration if they are a self-accrediting registered provider.

8.1 GCA and additional registration requirements

8.1.1 GCA will:

- a. Have and continually improve the transparency of written agreements, including agreements between providers and education agents that represent them (ESOS Standards 3 and 4)
- b. Protect the welfare of younger overseas students (ESOS Standard 5)
- c. Monitor and report course progress, and attendance (if applicable), thereby supporting students to complete their course within the required timeframe and fulfil their visa requirements (ESOS Standard 8)
- d. Inform the regulator (ASQA) of changes to registered course details and/or third-party arrangements (ESOS Standard 11)

9. Related Policy and Procedure

- 9.1 Due to the nature of this policy and procedure, most, if not all, policies within the organisation relate to this policy and procedure.
- 9.2 Due to the nature of this policy and procedure, most, if not all, procedures, for example, Standard Operating Procedures [SOPs], and documents within the organisation relate to this Policy and Procedure.

³ <https://internationaleducation.gov.au/Regulatory-Information/Documents/National%20Code%202018%20Factsheets/Standard%2011.pdf>



10. References

[Standards for Registered Training Organisations \(RTOs\) 2015 \(legislation.gov.au\)](http://legislation.gov.au)
[Users' guide to Standards for RTOs 2015 | Australian Skills Quality Authority \(ASQA\)](http://www.asqa.gov.au)
[The ESOS legislative framework \(internationaleducation.gov.au\)](http://internationaleducation.gov.au)
[General Factsheet - Department of Education, Skills and Employment, Australian Government \(dese.gov.au\)](http://dese.gov.au)
[VET Quality Framework | Australian Skills Quality Authority \(ASQA\)](http://www.asqa.gov.au)
[About the Standards for RTOs 2015 | Australian Skills Quality Authority \(ASQA\)](http://www.asqa.gov.au)
[Registered Training Organisations \(RTOs\) - Australian Industry Standards](http://www.asqa.gov.au)
[57050 Industrys role in VET FINAL.pdf \(ncver.edu.au\)](http://www.ncver.edu.au)

Procedure

Responsible staff for relevant area (as per Organisational Chart) to process the procedure:

Assess – Review aspects of situation as applied to this policy and any other related policies and specific documentation to be completed (and where relevant advising students of requirements of same as required), including relevant timeframes and any reporting mechanisms.

Plan – Identify strategies and actions to be taken, including timeframe/s and relevant personnel.

Implement - Strategies and take actions in accordance with policy, associated information and documentation required, documentation where necessary

Retain documentation in accordance with policy, procedure and practices.

Report in relation to practice outcomes as related to policy and procedure.

Review – process with view for continuous improvement including reporting to relevant personnel

Dissemination of information/updates relating to this policy and procedure is provided by Management, via electronic means and/or staff meetings. GCA policy and procedures are accessible to all staff via GCAinternal repository system and /or via GCA webpage.

Responsibility

The following parties are responsible for the implementation and adherence to this policy:

- DIRECTOR/CEO
- Student Support Supervisor
- Training Manager.
- Administration Team.



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E-mail: admissions@globalcollege.edu.au
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Associated Documents

Continuous Improvement & Quality Enhancement Procedure

Related Standards

- Standards for Registered Training Organisations (RTOs) 2015.
- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019, and
- National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Version Control

Version	Created by:	Date	Reason for Update	Reviewed by	Implementation Date
					Note: Must be after circulation to all stakeholders.
1.0	James Rayne	10/01/2022	New Format	Brodie Smith	24/01/2022
2.0	James Rayne	09/01/2023	Review Point	Brodie Smith	06/02/2023
3.0	Michelle Tilley	26/03/2024	New Format	Brodie Smith	03/04/2024

