



RTO MANAGEMENT SYSTEM

**POLICIES AND ASSOCIATED
PROCEDURES FOR RTO, CRICOS AND
ELICOS**

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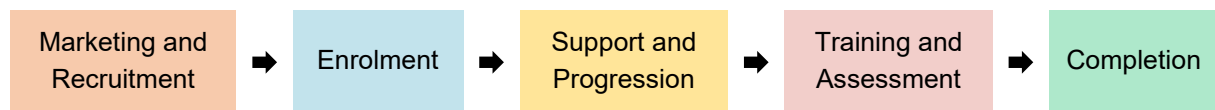
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INTRODUCTION

This set of Policies and Associated Procedures will ensure London College meets its compliance obligations as required by:

- National Vocational Education and Training Regulator Act 2011
- National Vocational Education and Training Regulator (Outcome Standards for NVR Registered Training Organisations) Instrument 2025
- National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025
- Credential Policy Standards for Registered Training Organisations
- National Vocational Education and Training Regulator (Financial Viability Risk Assessment Requirements) Instrument 2021
- National Vocational Education and Training Regulator (Data Provision Requirements) Instrument 2020
- Australian Qualifications Framework
- Education Services for Overseas Students Act 2000
- National Code of Practice for Providers of Education and Training Services to Overseas Students Act 2018
- ELICOS Standards 2018.

It has been ordered according to the student journey approach which is the way an RTO is audited by the Australian Skills Quality Authority (ASQA).



Regulatory Compliance and Governance is also addressed.

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DEFINITIONS

The following definitions apply to this set of policies and procedures:

- **AQF:** Australian Qualifications Framework as at: www.aqf.edu.au.
- **ASQA:** Australian Skills Quality Authority.
- **Course:** refers to the unit, qualification, skill set or group of units being packaged as a course.

- **Compassionate or compelling circumstances:** these may include, but are not limited to:
 - serious illness or injury
 - bereavement
 - major political upheaval or natural disaster in the home country requiring emergency travel and this has impacted on the student's studies
 - a traumatic experience which has impacted on the student.
- **Credit transfer:** credit provided to students for units of competency (unless licensing or regulatory requirements or the training product prevents this) where these are evidenced by AQF certification documentation issued by another education provider or AQF authorised issuing organisation or authenticated VET transcripts issued by the Registrar.
- **Critical incident:** includes but not limited to:
 - missing students
 - severe verbal or psychological aggression
 - death, serious injury or any threat of these
 - natural disasters
 - issues such as domestic violence, sexual assault, drug or alcohol abuse.
- **DHA:** Department of Home Affairs.
- **Cheating:** seeking to obtain an unfair advantage in the assessment of any piece of work.
- **Collusion:** unauthorised collaboration between students.
- **Deferral:** to postpone commencement of studies.
- **DET:** Department of Education and Training.
- **DEWR:** Department of Employment and Workplace Relations.
- **ELICOS Standards 2018:** <https://www.legislation.gov.au/Details/F2017L01349>
- **ESOS Act:** the Education Services for Overseas Act 2000: <https://www.legislation.gov.au/Details/C2017C00292>
- **Governing persons:** governing persons are those person(s) and/or body(ies) that are responsible for overseeing and directing, and exercise a degree of control or influence over, the management or operation of the RTO, including executive officers.
- **National Code 2018:** National Code of Practice for Providers of Education and Training to Overseas Students 2018: <https://www.legislation.gov.au/Details/F2017L01182>
- **Marketing:** this covers all marketing communication methods.
- **Principles of assessment:** assessment is conducted to be consistent with the following principles of assessment:
 - fairness – assessment accommodates the needs of the VET student, including through applying adjustments where appropriate and enabling reassessment where necessary;
 - flexibility – assessment is appropriate to the context, training product and VET student, and assesses the VET student's skills and knowledge that are relevant to the training product, regardless of how or where the VET student has acquired those skills or that knowledge;

- validity – assessment includes practical application components that enable the VET student to demonstrate the relevant skills and knowledge in a practical setting; and
- reliability – assessment evidence is interpreted consistently by assessors and the outcomes of assessment are comparable irrespective of which assessor is conducting the assessment.
- **Plagiarism:** to take and use the ideas and/or expressions and/or wording of another person or organisation and passing them off as one's own by failing to give appropriate acknowledgement. This includes material from any source such as staff, students, texts, resources and the internet, whether published or unpublished.
- **PRISMS:** Provider Registration and International Students Management System.
- **Outcome Standards for RTOs:** the SRTOs include the Outcome Standards, Compliance Requirements and Credential Policy.
- **Recognition of Prior Learning (RPL):** an assessment process that assess the competency of an individual that may have been acquired through formal, non-formal and informal learning to determine the extent to which the applicant meets the requirements specified in the training product.
- **Rules of evidence:** assessment is conducted to be consistent with the following rules of evidence:
 - validity – assessment evidence is adequate, such that the assessor can be reasonably assured that the VET student possesses the skills and knowledge described in the training product;
 - sufficiency – the quality, quantity and relevance of the assessment evidence enables the assessor to make an informed judgement of the VET student's competency in the skills and knowledge described in the training product;
 - authenticity – the assessor is assured that a VET student's assessment evidence is the original and genuine work of that VET student; and
 - currency – the assessment evidence presented to the assessor documents and demonstrates the VET student's current skills and knowledge.
- **SMS:** Student Management System.
- **Suspension:** to temporarily postpone studies.
- **Third party:** any party that provides services on behalf of London College. Services include training services, assessment services, training support services and activities associated with recruitment of prospective VET students including marketing, enrolment, induction or collection of fees. A third-party arrangement does not include a contract of employment between London College and its employee, other entities that deliver VET student counselling or mediation or provide ICT or other support services, experts who contribute to training or assessment, or an entity that refers students to the RTO where the referring entity does not receive payment from the RTO and the referring entity is a government agency or government funded agency.
- **Training support services:** these are services and resources provided to support students to meet training product requirements and complete the training product in which they are enrolled.
- **Wellbeing support services:** these are services and resources provided to support the physical, mental and emotional wellbeing of students.

RESPONSIBILITIES

It is the responsibility of the CEO supported by the management team to ensure that the policy and associated procedures are adhered to. All staff are expected to access and follow policies and associated procedures when completing work tasks.

Each policy and associated procedures include specific responsibilities.

MARKETING AND RECRUITMENT

Policies and associated procedures in this section:

- Marketing Policy and Associated Procedures
- Education Agent Policy and Associated Procedures.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Course Brochure Template – Domestic Students
- Course Brochure Template – VET Courses
- Course Brochure Template – ELICOS Courses
- Marketing Checklist – Domestic Students VET
- Marketing Checklist – VET Courses
- Marketing Checklist – ELICOS Courses
- Marketing Consent Form
- International Student Handbook – RTO, CRICOS and ELICOS Students
- Student Handbook – Domestic Students
- Education Agent Application Form
- Education Agent Agreement Template
- Education Agent Monitoring Form.

The documents above can be found in the *Marketing and Recruitment Supporting Documents* folder.

MARKETING POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures have been developed to guide London College when undertaking marketing and advertising activities. This is to ensure that learners are provided with current, clear, accurate, and accessible information before enrolling in a course.

This policy and associated procedures meet the requirements of Standards 2.1 and 2.2 of the Outcome Standards for RTOs, as well as marketing and advertising requirements in Compliance Requirements, the National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standards 1, 2 and 8.

Marketing by education agents is addressed in the Education Agent Policy and Associated Procedures.

POLICY STATEMENTS

MARKETING INFORMATION

Information about training/teaching, assessment and support services provided by London College or any third parties contracted by London College, enables learners to make informed decisions about enrolling into a course with London College and that is relevant to their needs and takes into account their existing skills and competencies.

This information is provided prior to commencement and is accessible in both electronic and print form.

London College identifies the information that is needed by VET students prior to enrolment and how that information is communicated.

Information provided by London College to prospective and current students:

- provides current, clear and accurate information regarding services offered.
- is sufficient to allow students to make an informed choice.
- distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification and any non-accredited training offered (VET courses only).
- includes all the information required under the relevant standards of the Outcome Standards for RTOs and Compliance Requirements, as well as the National Code 2018 as follows:
 - Legal entity and/or trading name and RTO Code or links to this information.
 - CRICOS Registered Name, Registration Number and CRICOS course code/s.
 - The code, title and currency of the Training Product or accredited course (as published on the National Register) or links to this information. A non-current Training Product will only be advertised or marketed while it remains on London College's scope of registration. Any other outcomes of the course will also be provided (for example, option to apply for a licence). This applies to VET courses only.
 - Includes information about any third parties who are recruiting students on behalf of London College, and their names and contact details.

- Outlines where London College is delivering training and assessment on behalf of another Registered Training Organisation or where training and assessment is being delivered on behalf of a third party and includes names and contact details of such. This applies to VET courses only.
- Outlines any work-based training and associated arrangements a student is required to undertake as part of the course. This applies to VET courses only.
- Outlines entry requirements (including English language proficiency, educational qualifications or work experience) for entry to the course.
- Provides information on course credit (credit transfer and RPL). This applies to VET courses only.
- Includes information on the duration (including holiday breaks), as well as the date of commencement, scheduling, location and mode/s of delivery.
- Includes information on facilities, equipment and other resources available to students.
- Includes information on materials and equipment, including IT equipment, that the student is expected to provide as part of their course.
- Includes information on support services available, including training support services, as well as wellbeing support services.
- Includes information about obtaining a USI.
- Includes details about VET Student Loans, entitlements and subsidies available through government funding or any other financial support arrangements as applicable. This applies to VET courses only.
- Includes links to information on the ESOS framework.
- Outlines any other information relevant to the registered provider, its courses or outcomes associated with those courses.
- Includes all relevant cost information including all tuition and non-tuition fees, payment terms and conditions, and the potential for fees to change over the duration of a course.
- Includes information about withdrawing from a course, including refund policies.
- Outlines the grounds on which a student's enrolment may be deferred, suspended or cancelled.

The Nationally Recognised Training (NRT) logo is used in accordance with the NRT Conditions of Use Policy. This applies to VET courses only.

London College only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised. This applies to VET courses only.

A Marketing Consent form is used to seek consent from any individual or organisation that is referred to in London College's marketing, promotions and advertising material.

London College or any associated third party will not:

- guarantee that a student will successfully complete a course and will be issued with a qualification or statement of attainment. This applies to VET courses only.
- state that a course can be completed such that it will not meet the requirements of the Standards. This applies to VET courses only.

- guarantee a successful education assessment outcome.
- guarantee any employment outcome arising from the completion of the training product.
- claim to secure any migration outcomes based on completing a course with London College.
- claim that a student will be eligible for any license or accreditation unless the license outcome is guaranteed by the issuer of the license or accreditation. This applies to VET courses only.
- give any other false or misleading information or advice in relation to itself, its course or outcomes associated with the course.
- knowingly recruit or seek to enrol an international student before they have completed six months of their principal course of study.

Students will be provided with information on the ESOS Framework and links to official Australian Government material in the International Student Handbook.

London College will publish a list of education agents on its website, including names and contact details.

All Course Brochures are developed according to information from London College's training and assessment strategies. Marketing information will not in any way advise that the training can be completed in any other way than as described in each training and assessment strategy. This applies to VET courses only.

The obligations of London College including that London College is responsible for the quality of training and assessment in accordance with the Standards for RTOs and for the issuance of AQF certification documentation are fully described in the Student Handbook. The Handbook also includes information about accommodation and indicative costs of living in Australia.

London College will abide by all marketing, promotion and advertising requirements under the Australian Consumer Law.

PROCEDURES

1. DEVELOP MARKETING MATERIAL

- 1.1 Access this policy when planning marketing materials.
- 1.2 Use information about pre-enrolment information and communication methods to determine the type of marketing materials that need to be developed. See the Quality Assurance Policy and Associated Procedures regarding how this information is collected.
- 1.3 Access the course information from the Training and Assessment Strategy (TAS) for VET courses and course curriculum for ELICOS courses.
- 1.4 Develop the marketing materials using the relevant template (i.e., the course brochure template).
- 1.5 Review materials developed with the Marketing Checklist, TAS or course curriculum and approved course fees.
- 1.6 Provide the materials for approval.

- 1.7 Upon approval, publish the information (print or website) and file approvals.

2. REVIEW MARKETING MATERIAL

- 2.1 Follow the above procedure where there are changes to a course.
- 2.2 Have materials reapproved by the relevant person.

3. REVIEW WEBSITE

- 3.1 Upload education agent details to website once agreements are signed.
- 3.2 Complete a check of the website at least every 3 months, or upon a change, for accuracy and completeness according to this policy.
- 3.3 Make changes accordingly.

4. DEVELOP MARKETING PLAN

- 4.1 Develop a marketing plan for marketing communications based on business objectives.
- 4.2 Implement and monitor the marketing plan.
- 4.3 Adjust the marketing plan based on effectiveness of marketing strategies or otherwise.

5. SEEK MARKETING CONSENT

- 5.1 Seek consent to use details and images for marketing communications using the Marketing Consent Form by providing the form to students at orientation.
- 5.2 File completed marketing consent forms.

RESPONSIBILITIES

The CEO is responsible for developing the marketing plan and approval of marketing materials.

The Academic Manager is responsible for developing and reviewing marketing materials and implementing and monitoring marketing strategies as per the marketing plan.

EDUCATION AGENT POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures have been developed to ensure that London College has processes in place to ensure that education agents act honestly and in the best interests of overseas students, as well as uphold the reputation of Australia's international education sector.

This policy and associated procedures meet the requirements of Standard 2.1 of the Outcome Standards for RTOs and marketing and advertising requirements in Compliance Requirements, as well as the National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 4.

POLICY STATEMENTS

OVERVIEW

London College will not accept students from an education agent if it knows or reasonably suspects the education agent to be:

- providing migration advice, unless that education agent is authorised to do so under the Migration Act
- engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Overseas student transfers)
facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her visa, and/or
- using PRISMS to create CoEs for other than bona fide students.

AGENT AGREEMENTS

All education agents representing London College must sign and abide by London College's Education Agent Agreement.

London College's Education Agent Agreement meets the requirements of the National Code including:

- responsibilities of London College, including that London College is responsible at all times for compliance with the ESOS Act and National Code 2018
- London College requirements of the agent in representing it including:
 - declaring in writing and taking reasonable steps to avoid conflicts of interests with its duties as an education agent of the registered provider
 - observing appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students
 - acting honestly and in good faith, and in the best interests of the student
 - having appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics

- London College's processes for monitoring the activities of the education agent in representing the provider and ensuring the education agent is giving students accurate and up-to-date information on the registered provider's services
- the corrective action that may be taken by London College if the education agent does not comply with its obligations under the written agreement, including providing for corrective action outlined in Standard 4.4
- grounds for termination of London College's written agreement with the education agent, including providing for termination in the circumstances outlined in Standard 4.5
- the circumstances under which information about the education agent may be disclosed by the registered provider and the Commonwealth or state or territory agencies.

MONITORING AND CORRECTIVE ACTION

London College will monitor all education agents using the monitoring processes described in the agreement.

London College will take immediate corrective action where London College becomes aware that, or has reason to believe, the education agent or an employee or subcontractor of that education agent has not complied with the education agent's responsibilities as outlined above.

TERMINATION

London College will immediately terminate its relationship with the education agent or require the education agent to terminate its relationship with the employee or subcontractor who engaged in those practices, where London College becomes aware, or has reason to believe that the education agent or an employee or subcontractor of the education agent is engaging in false or misleading recruitment practices.

PROCEDURES

1. PROCESS EDUCATION AGENT APPLICATIONS

- 1.1 Provide an Education Agent Application form to education agent.
- 1.2 On receipt of an application, check that the application form has been completed in full and that any supporting information has been provided.
- 1.3 Send an acknowledgement that the application form has been received within 3 working days of the receipt of the application. Request additional information not provided, as relevant.
- 1.4 Review information included in application form.
- 1.5 Call referees for reports on the agents.
- 1.6 Approve the agent's application where the agent has demonstrated experience and skills, provides services that align with London College's marketing objectives and positive reports from referees are received.

- 1.7 For successful agents, customise the Education Agent Agreement and send to the agent for signing. This must be within 10 working days of receiving the application.
- 1.8 Where the agent is not deemed to be suitable, send an email within 10 working days of receiving the application advising that their application has not been successful and including the reasons why.

2. MANAGE EDUCATION AGENTS

- 2.1 Following the signing of the agreement, add the agent details to PRISMS following the *How to manage agent details* in PRISMS information.
- 2.2 Following the signing of the agreement, advise ASQA via ASQAnet and within 30 days of the agreement being entered into or prior to the obligations under the agreement taking effective, whichever occurs first.
- 2.3 Add the agent details to list of agents on website.
- 2.4 File all signed education agent agreements.
- 2.5 Contact the agent to provide an induction, including an overview of London College, requirements and marketing and recruitment processes.
- 2.6 Provide the education agent with current copies of marketing materials and enrolment forms.

3. MONITOR EDUCATION AGENTS

- 3.1 Regularly update education agents with details of new courses and any updated marketing and enrolment materials/processes.
- 3.2 Monitor agents every six months using the Education Agent Monitoring Form.
- 3.3 Where the Education Agent Monitoring Form or feedback from students indicates that the Education Agent may not be meeting the terms of their agreement, immediately investigate the issue.
- 3.4 Where the investigation confirms that the provider has not complied with their responsibilities as per the Education Agent Agreement (except in the case of where the education agent has engaged in false or misleading practices – see the following section), contact the education agent in writing to advise to corrective actions that are required.
- 3.5 Implement relevant corrective actions.
- 3.6 Monitor corrective actions as required to ensure they are implemented.
- 3.7 File all documentation associated with monitoring.

4. TERMINATE EDUCATION AGENT AGREEMENTS

- 4.1 Where education agent monitoring or any other intelligence demonstrates that the education agent has engaged in false or misleading practices, immediately send a notice in writing to the agent advising them that their agreement is terminated and giving the reasons why.
- 4.2 Remove the agent details from website.
- 4.3 Remove the agent details from PRISMS following the *How to manage agent details* in PRISMS information.
- 4.4 Advise ASQA via ASQAnet of termination of the agreement and within 30 days of the agreement ending.

RESPONSIBILITIES

The Academic Manager is responsible for:

- assessing and approving education agent applications
- managing education agent applications
- monitoring and terminating education agent agreements.

ENROLMENT

Policies and associated procedures in this section:

- Student Enrolment and Completion Policy and Associated Procedures
- Fees and Refunds Policy and Procedure.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Application for Enrolment Form – Domestic Students
- Application for Enrolment Form – International VET Students
- Application for Enrolment Form – ELICOS Students
- Course Entry Interview Form – International VET Students
- Course Entry Interview Form – ELICOS Students
- Offer Letter and Student Agreement – Domestic Students
- Offer Letter and International Student Agreement – International VET Students
- Offer Letter and International Student Agreement – ELICOS Students
- First Warning Letter for Non-Payment of Fees
- Second Warning Letter for Non-Payment of Fees
- Notice of Intention to Report for Non-Payment of Fees
- Refund Application Form.

The documents above can be found in the *Enrolment Supporting Documents* folder.

STUDENT ENROLMENT AND COMPLETION POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to student enrolment and completion. This ensures that there are structured processes in place for the enrolment of students, issuing of credit transfer and recognition of prior learning, changes to services and the issuing of certificates on completion.

This policy and associated procedures meet the requirements of Standards 1.6, 1.7, and 2.2 of the Outcome Standards for RTOs and AQF certification documentation, student identifiers and nationally recognised training logo requirements in Compliance Requirements, as well as Standards 2 and 3 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018. It also meets the requirements of Standard P3 of the ELICOS Standards 2018.

POLICY STATEMENTS

ENROLMENT

- Information about the enrolment process is provided in Course Brochures and the International Student Handbook.
- Applicants must meet the entry requirements to be accepted into a course. The entry requirements are included in each Course Brochure and include language, literacy and numeracy and digital literacy requirements. For international students, the English Language proficiency requirements specified ensure that students have the required language and literacy skills. The requirement to have completed Year 12 or equivalent will ensure that students have the required numeracy skills.
- On receipt of an application, a course entry interview will be conducted and a decision made on whether the student is suitable for the course based on the course entry interview and the documentation provided by the student in support of their application. The course entry interview process will also include a LLN assessment for domestic students and all students will be required to be assessed for their digital literacy. ELICOS students will also need to complete an English Placement Test so that their English language proficiency can be assessed and so that they can be placed at the appropriate level.
- Where a student is accepted into the course, they are provided with an Offer Letter and Student Agreement for signing to indicate their acceptance of the offer. The Offer Letter and Student Agreement meets all of the requirements of Standard 3 of the National Code. Fees are only accepted concurrently with or following acceptance of the Offer Letter and Student Agreements as per London College's Fees and Refunds Policy and Procedure.
- London College uses an AVETMISS compliant Student Management System to record all student information. This is also used for ELICOS students, although their information does not need to be reported to NCVER.
- Records of all enrolment records including the Offer Letter and Student Agreement and associated receipts of payment are retained for at least 2 years.

CREDIT TRANSFER AND RPL – VET STUDENTS ONLY

- Students are able to seek recognition of prior learning (RPL) and credit transfer. This means that students do not have to repeat units (or equivalent) already achieved and can be recognised for formal and informal learning, skills and experience.
- Students will be offered the opportunity to seek credit transfer and RPL during the enrolment process and will be informed of London College processes for this. Information about RPL and credit transfer is included in student handbooks.
- All decisions about credit transfer and RPL are fair, consistent and transparent and are documented. Decisions about RPL will maintain the integrity of the training product.
- London College will review all AQF certification documentation or an authenticated VET transcript (unless prevented by licensing or regulatory requirements) and authenticate it as part of the process of awarding credit.
- Applicants who wish to apply for RPL will be provided with a RPL Kit. The RPL process will be followed as per the procedures included with this policy.
- Applicants will be advised in writing of the outcome of their application for credit transfer and/or RPL. Where the credit provided results in a reduction of the duration of the course and fees, this will also be advising in writing.

CHANGES TO SERVICES

- Students are informed within 3 working days of any changes to services as documented in the Student Agreement, including where there are new third party arrangements, changes to existing third party arrangements and changes in ownership.
- Where London College is unable to offer a course prior to or following commencement, refunds will be in accordance with the Fees and Refunds Policy and Associated Procedures.

COMPLETION – VET STUDENTS ONLY

- AQF certification documentation is issued to students who have met the requirement of the training product.
- AQF certification documentation is issued to students within 30 calendar days of successful completion of their course provided they have completed the AQF qualification or one or more units of the qualification and paid all agreed fees.
- All certificates issued are recorded in the Student Management System and are kept for a period of 30 years.
- All certification documentation complies with AQF certification documentation and Nationally Recognised Training logo requirements in the Compliance Requirements and includes a mechanism to ensure it cannot be fraudulently reproduced.
- Certification documentation will only be issued where the student's USI is on file (unless an exemption applies under the Student Identifiers Act 2014) and has been verified and where the student has paid their fees in full.
- Confirmation of the issuing of certificates will be provided to those who need to verify certificates.

- Certificates can be reissued on request.

COMPLETION – ELICOS STUDENTS ONLY

- Students are issued with certification documentation following completion or partial completion of their course. All certification documentation complies Standard P4.2.
- Certification documentation will only be issued where the student has paid their fees in full.
- Certification will be issued within 30 days of completion subject to the payment of all fees. All certificates issued are recorded in the Student Management System and are kept for a period of 30 years.
- Confirmation of the issuing of certificates will be provided to those who need to verify certificates.
- Certificates can be reissued on request.

PROCEDURES

1. PROCESS ENROLMENT

- 1.1 Provide application for enrolment forms to applicants on request.
- 1.2 On receipt of an enrolment, check that the enrolment form has been completed in full and that all supporting information has been provided.
- 1.3 Send an acknowledgement that the enrolment form has been received within 3 working days of receipt. Request additional information not provided as relevant.
- 1.4 Enter the applicant's details into the secure Student Management System.
- 1.5 Where the USI has not been received, make a note on the applicant's file that it is to be completed at the orientation.
- 1.6 Verify all USIs.
- 1.7 Where an applicant indicates they have a USI exemption, they will be informed in writing prior to the completion of the enrolment process that the results of the training will not be accessible through the Commonwealth and will not appear on any authenticated VET transcript prepared by the Registrar.

2A. CONDUCT COURSE ENTRY INTERVIEW – VET STUDENTS ONLY

- 2.1a Contact the applicant to arrange a suitable date and time for the course entry interview. This should be within 4 working days of receipt of the application for enrolment.
- 2.2a For domestic students, conduct the course entry interview using the Course Entry Interview Form.
- 2.3a Complete the course entry interview to determine whether the applicant is suitable for their chosen course and the applicant's support needs.

For domestic students, provide the language, literacy and numeracy assessment to determine LLN level.

For international students, check that the student satisfies the entry requirements specified for English language proficiency.

Generally, international students are required to demonstrate English language proficiency through evidence of:

- an IELTS* score of 6.0 (test results must be no more than 2 years old); or
- having been educated for at least 5 years in an English-speaking country; or
- having completed at least a Certificate III level or IV course in an Australian RTO within the last 2 years (check the Course Brochure for the level); or
- completion of another English Language Test such as PTE and TOEFL (results should also be no more than 2 years old).

Scores should be checked to ensure equivalence to IELTS 6.0 as required using the following websites:

<https://ielts.org/organisations/ielts-for-organisations/compare-ielts>

For international students, check that the student satisfies the entry requirements specified for numeracy skills.

- 2.4a Provide the digital literacy assessment to all students and assess them according to the benchmarks in the assessment.
- 2.5a Document the outcomes of the course entry interview process, including LLN/English Language proficiency and numeracy and digital literacy in the Course Entry Interview Form.
- 2.6a Communicate the outcomes of the course entry interview process by either confirming the student's enrolment or advising in writing that they have not been accepted into the course and the reasons why. Note where the student's enrolment is confirmed and they require support, ensure the student support policy and associated procedures is followed and a student support plan is documented.

2B. CONDUCT COURSE ENTRY INTERVIEW – ELICOS STUDENTS ONLY

- 2.1b Contact the applicant to arrange a suitable date and time for the course entry interview. This should be within 4 working days of receipt of the application for enrolment.
- 2.2b Conduct the course entry interview using the Course Entry Interview form.
- 2.3b Complete the Course Entry Interview form and provide them with the English Placement Test for completion.
- 2.4b Based on the results of the course entry interview and the English Placement Test, assess the student's suitability for the course and the class in which they should be placed as relevant to their English language proficiency.

3. PROCESS CREDIT TRANSFER – VET STUDENTS ONLY

- 3.1 Check if the student wishes to apply for credit transfer – this will be through a review of the Application for Enrolment Form and/or through the course entry interview process. The student must provide their AQF certification documentation or authenticated VET transcript.
- 3.2 Review the student's AQF certification documentation or authenticated VET transcript to assess whether they have completed an equivalent training product. Note that credit transfer cannot be provided if this is not allowed as per licensing or regulatory requirements or the training product.
- 3.3 Where the student has provided AQF certification documentation, contact the issuing RTO to verify that the certificate is authentic. Where the AQF certification documentation is not confirmed as authentic, contact the student to discuss.
- 3.4 Where the assessment confirms that the student has completed an equivalent training product as demonstrated by AQF certification documentation or authenticated VET transcript, record this on the student's record on their Student Management System.
- 3.5 Inform the student of the outcome of the credit transfer assessment, including whether the application has been successful or not. If credit transfer will not be awarded, explain to the student why. If credit transfer will be awarded, advise the student of any reduction to their course duration and fees. The reduction in course duration will be as per the amount of time allocated in the timetable to the unit that the student has received credit for. See Fees and Refunds Policy and Associated Procedures for calculation for reduction of fees.
- 3.6 Issue the Offer Letter and Student Agreement with the relevant fees and duration considering the credit transfer awarded.
- 3.7 For international students, issue the COE including the duration considering the credit transfer awarded.
- 3.8 Where a student applies for credit transfer once they have commenced their course, this credit transfer process must be followed and the Offer Letter and Student Agreement updated. For international students, their change of course duration will need to be reported in PRISMS. Any fee reductions will be processed as per the Fees and Refunds Policy and Associated Procedures.

4. PROCESS RECOGNITION OF PRIOR LEARNING (RPL) – VET STUDENTS ONLY

- 4.1 Check if the student wishes to apply for RPL – this will be through a review of the Application for Enrolment Form and/or through the course entry interview process.
- 4.2 Provide the student with the relevant RPL Kit and follow the instructions for processing an RPL application as set out in the assessor version of the RPL kit. The RPL assessment process as documented in the RPL kit ensure that decision are fair and consistent and maintain the integrity of the training product.
- 4.3 Record the outcome of the RPL assessment process on the student's record in the Student Management System.

- 4.4 Inform the student of the outcome of the RPL assessment, including whether the application has been successful or not. If RPL will not be awarded, explain to the student why. If RPL will be awarded, advise the student of any reduction to their course duration and fees. The reduction in course duration will be as per the amount of time allocated in the timetable to the unit that the student has received credit for. See Fees and Refunds Policy and Associated Procedures for calculation for reduction of fees.
- 4.5 Issue the Offer Letter and Student Agreement with the relevant fees and duration considering the RPL provided.

5. FINALISE ENROLMENT PROCESS

- 5.1 If the applicant is suitable for the course, create a student file.
- 5.2 Verify the student's USI or create a USI for the student following the procedures for such at: <https://www.usi.gov.au/providers/verify-student-usi>. This is for VET students only.
- 5.3 Customise the Offer Letter and Student Agreement for the student and send out to the student for signing. This should occur within 5 working days of receipt of the application for enrolment. The signing of the Offer Letter and Student Agreement indicates the student has accepted all terms and conditions.
- 5.4 On receipt of the signed Offer Letter and Student Agreement, send out an invoice for the first payment.
- 5.5 Following receipt of the first payment by the student, create a CoE in PRISMS following the instructions in the PRISMS User Guide.
- 5.6 Use the student file checklist to confirm all the information has been collected.

6. MANAGE STUDENT FILES

- 6.1 Update student files throughout the course according to relevant events including but not limited to course progress and attendance, support, course credit, course transfer, deferral, suspension and withdrawal and disciplinary action. Refer to all of the relevant policies and procedures for student file management.
- 6.2 Update Student Agreements as relevant based on any changes that occur once the student has enrolled (this also includes changes to third party arrangements including new third party agreements or changes in ownership). Send to the student for agreement within 3 working days of signing and adjust fees and the CoE as required.
- 6.3 Send out emails to students every 6 months requesting advice of any change of contact details (note students are also required to provide these within 7 days of any change).
- 6.4 Update student details as required based on changes to contact details.

7. FINALISE CERTIFICATION

- 7.1 Immediately record student assessment outcomes on the Student Management System on receipt of marked work from trainers/assessors.
- 7.2 Once all units have been completed, check that the student has paid all agreed fees. If the student withdraws before completing a qualification in full, they must also pay all agreed fees and will be eligible to receive a statement of attainment.
- 7.3 Contact the student in writing regarding unpaid fees if applicable, indicating these must be paid before they can receive their AQF certification.
- 7.4 Check the student's USI is on file and contact the student in writing if this has not been received. This is for VET students only.
- 7.5 Populate the testamur and record of results or statement of attainment with the student and award details. This is for VET students only.
- 7.6 Populate the certificate or partial certificate with the student and award details. This is for ELICOS students only.
- 7.7 Sign certification (authorised signatory).
- 7.8 Have the certification ready within 10 working days of the student having been assessed as meeting all the requirements of their course (and having paid all of their fees).
- 7.9 Retain the student's certification on file for a period of 30 years.
- 7.10 Advise the student via email that their certificate is ready for collection or email an electronic version or send via post.
- 7.11 Reissue AQF documentation certification as required by students on request. Fees for such are included in the Fees and Refunds Policy and Associated Procedures and International Student Handbook.
- 7.12 Retain all student details including assessment outcomes for a minimum of 2 years.
- 7.13 Provide reports to ASQA as required of records of qualifications and statements of attainment issued.

RESPONSIBILITIES

The Administration and Student Support Officer will be responsible for:

- checking all incoming applications for enrolment
- populating and sending out Offer Letters and Student Agreements
- invoicing
- using the student management system
- drafting CoEs

- student file maintenance.

The Academic Manager will be responsible for:

- conducting course entry interviews and approving student applications
- reviewing and approving all applications for credit transfer
- coordinating notification of changes to services and updating agreements
- approving CoEs
- issuing certification.

Trainers and assessors are responsible for conducting RPL.

FEES AND REFUNDS POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to the effective and fair management of fees, charges and refunds. This ensures that support is provided to students to assist them to complete their studies.

This policy and associated procedures meet the requirements of Standards 2.1 of the Outcome Standards for RTOs and marketing and advertising requirements, AQF certification documentation and prepaid fee protection measures in Compliance Requirements, as well as Standards 2 and 3 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, as well as the ESOS Act 2000 and the ESOS (Calculation of Refund) Instrument 2024.

POLICY STATEMENTS

INFORMATION ABOUT FEES AND CHARGES

London College is committed to providing students with information about all fees and charges associated with a course, as well as its refund policy and processes.

Prospective students can access information about fees and charges and refunds in the International Student Handbook and Course Brochure.

Enrolling students are fully informed of all fees and charges and the refund policy in the Offer Letter and Student Agreement.

The Offer Letter and Student Agreement includes details of all applicable fees and charges, including the application fee, tuition and non-tuition fees and the payment schedule for such and payment options. It also describes the student's consumer rights, including the right to a cooling off period depending on the relevant state/territory requirements.

Students are advised of the potential for fees and charges to change over the duration of their course.

Students are advised of any statutory cooling off period in their Offer Letter and Student Agreement.

All fees and charges will be reviewed annually and all marketing material and student information will be updated accordingly. New fees and charges will generally only apply to incoming students.

TERMS AND CONDITIONS

Fees & Charges

All fees are quoted in Australian dollars and are subject to change without notice. See the website for current information about course tuition fees, payment schedules and other fees and charges.

Payment Terms

An initial deposit is required at the time of enrolment for the enrolment fee and the course material fee. The enrolment fee is non-refundable.

Course tuition fee is collected on a quarterly basis each term in advance (after the commencement of the course). All term payments must be paid in full, 14 days in advance of the term commencing in order to maintain a valid enrolment.

Please note that our refund policy can be read in this International Student Handbook document. Our Letter of Offer document will also include all the important and essential information that you need to know before you make your final decision to enrol in any of our courses. We strongly advise our potential students to read carefully and understand it before they sign the Letter of Offer document.

Terms and Conditions

After the prospective student is offered a place in a course and signs London College Letter of Offer and International Student Acceptance Agreement a binding contract is made between the student and the College. The contract is governed by the laws of the Commonwealth of Australia and the State of New South Wales.

Students will not be permitted to commence or continue their course until all fees or charges are paid. All fees are payable two weeks before term commencement however to be eligible for acceptance into a course payment should be made when returning the signed International Student Acceptance Form to London College.

Students may choose to pay more than 50 per cent of their tuition fees before their course commences. This is not required by the College.

Provision has been made to protect payments received in advance by students as stated under the conditions of Tuition Protection Service. All course fees are deposited into London College Student Fees Account. When the student commences their course, London College will draw down these funds from the designated account.

In the case where a student has accepted and paid fees for a conditional offer for a place in a London College course, evidence of a student's English level to meet the requirements of that course must be provided in advance of the course start date otherwise London College reserves the right to defer the student's start date until the next available course intake.

Statutory Cooling Off Period

Under the Australian Consumer Law, most products and services bought in Australia come with automatic guarantees that it will work and do what you asked for. Businesses must provide these automatic guarantees regardless of any other warranties they give to you or sell you. If a business fails to deliver any of these guarantees, you have consumer rights for:

- repair, replacement or refund
- cancelling a service
- compensation for damages and loss.

See the NSW Fair Trading website for specific information on guarantees, contracts and warranties as it applies in NSW. <https://www.fairtrading.nsw.gov.au/buying-products-and-services/guarantees,-contracts-and-warranties/contracts>

Please also see the information in this Student Handbook on London College's:

- Complaints and appeal policy and procedure.
- Fees and refund policy

The Standards for Registered Training Organisations require a person to be informed of their right to a statutory cooling off period. A statutory cooling off period is defined within the Australian Consumer Law which was introduced in 2011. A statutory cooling off period (which is 10 days) is a period of time provided to a consumer to allow them to withdraw from a consumer agreement, where that agreement was established through unsolicited marketing or sales tactics. These include tactic such as door-to-door sales and telemarketing. A statutory cooling off period allows a consumer to withdraw from a sales agreement within 10 days of having received a sale contract without penalty. All students are recommended to refer to the Australian Consumer Law, Sales Practices Guide for further details about a statutory cooling off period and our general obligations for consumer protection during the enrolment process.

It must be noted that London College does not engage in unsolicited marketing or sales tactics and therefore a statutory cooling off period is not likely to be applicable to our learners who have enrolled into a program. For refund option in other circumstances, learners must refer to the refund policy.

FEE PROTECTION

Fees paid by students are protected as follows:

- Domestic students: students pay up to a maximum of \$1,500 in advance for services not yet provided.
- International students: international student fees are protected through the following mechanisms:
 - Maintaining a sufficient amount in London College's account so that so that it is able to repay all tuition fees already paid.
 - Through membership of the Tuition Protection Scheme (TPS). The role of the TPS is to assist international students where the Registered Training Organisation is 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.
 - In addition, international students are not required to pay more than 50% of course fees prior to commencement, except where a course is less than 26 weeks. However, any international student may choose to pay their fees in full or a greater amount than 50%.

PAYMENTS

Payment options are specified in the Offer Letter and Student Agreement.

All fees and charges are to be paid by the date indicated on the invoice. However, where a student is unable to make a payment by the specified date, alternative arrangements may be made by contacting the office.

All payments are to be made by bank transfer into a specified account, the details of which are provided to students. London College will maintain a sufficient amount in the account so that it is able to repay all tuition fees already paid.

Where fees are overdue and the student has not made alternative arrangements, a first warning, second warning and notice of intention to report regarding non-payment of fees will be sent to the student as follows:

- First warning letter: failing to pay an invoice within 5 days of receipt or contacting London College to make alternative arrangements.

- Second warning letter: failing to pay an invoice within 5 days of receipt of the first warning letter or contacting London College to make alternative arrangements.
- Notice of intention to report: failing to pay an invoice within 5 days of receipt of the second warning letter or contacting London College to make alternative arrangements.

Following cancellation of enrolment due to non-payment of fees, the debt will be referred to a debt collection agency.

All receipts of payments are kept for a minimum of 2 years following the student's completion of their course.

CREDIT TRANSFER AND RPL – VET STUDENTS ONLY

A reduction of fees can apply for any units granted through credit transfer and RPL. The course tuition fees should be divided by the number of units and then the reduction applied per unit for the applicable number of units. This should be shown on the invoice.

REFUNDS

Refunds for international students are calculated in accordance with the ESOS framework.

Conditions

- All refund requests are conditional on the following:
 - The College must have received funds in order for any refunds to be made available (i.e. cheques are cleared, telegraphic transfers have been received);
 - Any debts to the College must be paid in full or the outstanding amounts will be deducted from the refund.

Withdrawal from the course

- Where written notice of withdrawal is received by the College before the start date of the course, the College will refund the fees as per the table below less the non-refundable enrolment fee of \$250.

Notice of withdraw	Refund amount for any tuition fees paid for the first 3 months	Refund amount for tuition fees paid over for 3 months in advance
28 days or more prior to course commencement	80%	100%
Between 14 - 28 days prior to course commencement	70%	100%
Less than 14 days prior to course commencement	No refund	100%

- Refunds will be made available within 14 days (10 working days) of written notification being received by the College.

Special circumstances

- Where a student withdraws from the course and returns home because of exceptional and extenuating circumstances of a compassionate nature, such as a death or severe illness in the immediate family, 100% of all the unspent fees paid less any administration fees will be refunded.

Refund procedure

- London College students must complete an Application for Refund form to apply for a refund and attach all evidence and supporting documentations, such as (but is not limited to):
 - a letter from Department of Home Affairs advising of a rejection of the student visa application or a refusal to extend a student visa; or
 - proof of extenuating circumstances of a compassionate nature; or
 - an unconditional offer letter from another institution along with a Department of Home Affairs approved letter to transfer
- In case of London College default on the agreement, refunds will be made within 14 days of the default date.
- All other refunds will be made within 28 days (20 working days) of written notification from the student being received by the College. Refunds will be paid to the student or to the person nominated by the student on the refund application in Australian Dollars.

Payment of Refunds

- Payment of refunds to the applicant will be made in Australian dollars by a bank draft or telegraphic or electronic transfer (or other approved payment options).

Student's Rights to Appeal

- Any student who is refused a refund by the College may appeal within 14 days in writing to Student Administration.
- The College's appeal process does not circumscribe the student's right to pursue other legal remedies.

If the Australian Government refuses Visa Application

- If the student visa application or visa renewal is refused by the Australian Government, a full refund of course fees less the administration fees will be made. In order to receive the refund students will have to provide authenticated evidence of the student visa refusal to the College.
- However, no refunds will be granted where:
 - An international student, currently in Australia, has their student visa cancelled by the Department of Home Affairs for a breach of visa conditions; or
 - An international student, currently in Australia, has their student visa extension application refused by the Department of Home Affairs after the commencement of their studies, for not meeting visa requirements.

Provider default on delivery of qualification

- In an unlikely event that the College is unable to start or deliver the course (known as an College Default), students can choose to accept either:
 - a refund of the course fees, which will be issued to the student within 14 days; or
 - to be placed in an alternative course with the College or another provider.
- If the Student chooses placement in an alternative course, the student must sign a new written agreement to indicate the student accepted the placement.
- If the student chooses to receive a refund of the course fees, the College will calculate the unspent portion of the tuition fees paid to date (that is tuition fees the student has paid for but has not been delivered by the College). The refund will be paid within 14 days on which the course ceased to be provided.
- If the College is unable to provide a refund or place the student in an alternative course, the Tuition Protection Service (TPS) will provide the student with options for suitable alternative courses (if any such courses are available) or if this is not possible, the student will be eligible for a refund as calculated by the TPS Director.
-

Reason for Refund	Notification Period	Refund	
Student's application for a student visa unsuccessful	Before semester commences	Full refund (less \$250 non-refundable enrolment fee) or less the amount specified under the student default provisions of the Commonwealth ESOS act and regulations (section 29(1b) and regulations 3.19(2))	
London College withdraws offer, fails to provide programme offered or terminates course (London College reserves the right to apply the provisions of the Commonwealth ESOS Act 2000)	Before Semester commences	If an alternative course is not available; Full refund of paid tuition fee, enrolment fee and materials fee	
	After Semester commences	Refund of unspent portion of tuition fees paid. No refund is granted for enrolment fee or materials fee.	
Student with a student visa withdraws (All withdrawals must be in writing; Agent must also be contacted by student and College)	Notice of withdraw	Refund amount for any tuition fees paid for the first 3 months	Refund amount for tuition fees paid over for 3 months in advance
	28 days or more prior to course commencement	80%	100%
	Between 14 - 28 days prior to course commencement	70%	100%
	Less than 14 days prior to course commencement	No refund	100%
If London College withdraws a student from an Education Service because the student has seriously breached international student Visa conditions or London College policies and procedures.	Prior to course commencement	Full refund of tuition fees paid, and materials fees paid less any amount for materials already received. No refund of enrolment fee	
	After course has begun	No refund of the fees paid (students may apply for special consideration which will be assessed case by case)	
For onshore students, Visa extension/s not granted by Australian Government, but student already commenced his/her course OR student defaults or withdraws from course during visa processing but already commenced his/her course	Prior to course commencement	Full refund of tuition fees paid, and materials fees paid less any amount for materials already received. No refund of enrolment fee	
	After course has begun	No refund of fees paid (students may apply for special consideration which will be assessed case by case)	

Refund Policy Special Conditions:

- London College reserves the right, at the discretion of the CEO - should particular circumstances arise - to increasing the amount of refund due and / or waive the conditions, requirements for those students who are forced to withdraw for reasons of a compassionate nature or where their reasons are deemed to be reasonable and genuine.
- Refunds will be made payable to the student who is transferring.
- In the case of a student not continuing studies, refunds will be made to the student's home account and are to be made immediately following the student's departure from Australia.
- London College will always notify students formally when they are at risk of termination due to non-compliance with student Visa conditions or London College policies and procedures.
- Once the Student is advised formally of non-compliance, they are advised they can access London College, Complaints and Appeal process within 20 working days and that Department of Home Affairs will be informed.

- In the unlikely event that London College is unable to deliver a course in full; the student will be offered a refund of all the tuition fees they have paid to date and in advance. The refund will be paid within two weeks of the day on which the course ceased being provided.

Additional Fees and Charges

London College has the following of additional charges/ Details are found in the written agreement that you signed at the commencement of your course.

Item	Cost
Re-issuance of COE	\$AUD 100
Re-issuance of Certificates, Statement of Attainments	\$AUD 50 per Statement or Attainment or qualification
Re-issuance of Transcript (Record of Results)	\$AUD 25 per Statement or Attainment or qualification
Copies of existing record of student- e.g., COE	\$AUD 25 per page
Recognition of Prior Learning (RPL) Fee	\$AUD 150 per unit of competency
Student Identification Card Replacement	\$AUD 10
A late payment fee applies to students with delayed payments for their tuition fees	\$AUD 10 per term
Credit card surcharges	2% for all credit cards
Overseas Bank Transfer Fee	\$AUD 30
Unit of competency assessment resubmission Fees (where a student is not deemed competent in a unit of competency, after 3 attempts)	\$AUD 25 to resubmit an assessment after three attempts
Unit Re-sit Fees (for a student to re-sit a unit of competency/ module.	\$AUD 250
Photocopy fee	\$AUD 5 per page
Change of course - post commencement	\$AUD 200
Fees for accessing your student records.	\$AUD 25

RESPONSIBILITIES

The Administration and Student Support Officer is responsible for issuing invoices, following up on overdue fees and issuing warning letters and a cancellation notice for non-payment of fees and issuing refunds.

The Academic Manager is responsible for discussing and adjusting student financial arrangements if required, assessing refund applications and approving refund payments.

The CEO is responsible for provider default notification.

SUPPORT AND PROGRESSION

Policies and associated procedures in this section:

- Student Support Policy and Associated Procedures
- Complaints and Appeals and Associated Procedures
- Course Progress and Attendance Policy and Associated Procedures
- Deferral, Suspension and Cancellation Policy and Associated Procedures

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Orientation Presentation
- Student Code of Conduct
- Student Support Plan
- External Support Referrals – Domestic Students
- External Support Referrals – International Students
- Complaints and Appeals Form
- Complaints and Appeals Register
- Intervention Form
- First Warning Letter for Unsatisfactory Course Progress/Attendance
- Second Warning Letter for Unsatisfactory Course Progress/Attendance
- Notice of Intention to Report for Unsatisfactory Course Progress/Attendance
- Deferral Application Form
- Release Application Form
- Suspension Application Form
- Withdrawal Application Form.

The documents above can be found in the *Support and Progression Supporting Documents* folder.

STUDENT SUPPORT POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to student support. This ensures that support is provided to students to assist them to complete their studies.

This policy and associated procedures meet the requirements of Standards 2.1, 2.3, 2.4, 2.5 and 2.6 of the Outcome Standards for RTOs, Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, as well as Standard P3 of the ELICOS Standards.

POLICY STATEMENTS

STUDENT SUPPORT

London College is committed to assisting students to complete their studies through the provision of academic and welfare support.

Student support needs may concern (but are not limited to):

- language, literacy and numeracy (LLN) issues
- disability
- digital literacy
- access
- their wellbeing
- cultural issues.

Support services provided by London College can include:

- one-to-one support from the trainer/assessor
- support with personal issues, including wellbeing
- access to additional learning resources
- reasonable adjustment in training and assessment
- social events
- buddy program
- information about external sources of support.

Information about student support, including how and when students can access trainers and assessors and other support staff, is provided in a range of ways including through student handbooks, course entry interview process, orientation and ongoing updates.

Student support needs are considered during the course development process by assessing the needs of the proposed target group and ensuring that the proposed training and assessment approach takes these needs into account.

As part of the enrolment process, London College requires students to participate in a course entry interview. The course entry interview identifies student suitability for the course, as well as their

support needs. Where a student is already studying and requires support, an interview is set up to discuss support needs.

Where support needs are identified, a Student Support Plan is developed. The Student Support Plan is regularly reviewed and adjusted as required.

London College makes reasonable adjustments for students with a disability as per Part 3 of the Disability Standards for Education 2005.

London College ensures that sufficient support staff are in place to meet the needs of the enrolled students. London College nominates specific personnel for student support, the details of whom are provided to students.

Where London College is unable to provide the support service required by the student, London College will refer the student to an external provider.

London College surveys students about support services provided and uses the feedback to improve services provided.

PROCEDURES

1. ASSESS STUDENT SUPPORT NEEDS DURING THE COURSE DEVELOPMENT PROCESS

- 1.1 Consider support needs of the target group for the course during the course development process.
- 1.2 Review any feedback on support services that can inform support to be provided.
- 1.3 Document agreed support services for the course in the Training and Assessment Strategy and Course Brochure.
- 1.4 Check Student Handbook and Orientation PowerPoint and update as required with the identified student support services, including details of how to access for both internal and external services.
- 1.5 Ensure all staff have access to up-to-date details of student support services.

2. ASSESS STUDENT SUPPORT NEEDS

- 2.1 Conduct interview to identify and assess student support needs. This may be as part of the course entry interview process for new students or an interview specifically set up for students already studying to discuss their support needs.
- 2.2 Use the Student Support Plan to guide the interview. This should also include discussing available internal support services, as well as highlighting external services available. Use the external support referrals document to inform this discussion and provide this document to the student.
- 2.3 Use the Student Support Plan Form to document the student's needs and how these will be actioned.

- 2.4 Provide the completed Student Support Plan to the student within 2 working days of the Support Plan being completed. The Support Plan will also indicate where any support cannot be provided and why.

3. PROVIDE ORIENTATION

- 3.1 Organise the orientation for students prior to commencing their course or on the first day of their course.
- 3.2 Conduct the orientation using the Orientation PowerPoints. This will also include details of the counselling service available including where and when it is available.
- 3.3 Answer all student questions during the orientation.

4. MONITOR STUDENT SUPPORT NEEDS

- 4.1 Regularly review the Student Support Plan to ensure actions are being implemented as required.
- 4.2 Adjust the Student Support Plan in consultation with the student as required.
- 4.3 At the conclusion of the student's course or when the Student Support Plan is complete, evaluate the effectiveness of the plan in consultation with the student.
- 4.4 Use the evaluation results to improve support services offered.
- 4.5 Regularly review external support services to check their details are the same as referred to in the Student Handbook and Orientation PowerPoint and to enter in any new services.

RESPONSIBILITIES

The Academic Manager is responsible for:

- considering student support needs during the course development process
- conducting course entry interview and identifying student needs
- developing and monitoring the Student Support Plan
- evaluating the effectiveness of student support provided
- providing orientations.

The Administration and Student Support Officer is responsible for:

- providing students with information about support services
- providing referrals to external services
- referring students to the Academic Manager.

The counsellor is responsible for providing academic and welfare support.

Trainers and assessors are responsible for notifying the Academic Manager of a student's support needs.

COMPLAINTS AND APPEALS POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to managing complaints and appeals. This is to ensure that complaints are handled in a transparent way, as well as fairly, efficiently and effectively.

This policy and associated procedures meet the requirements of Standard 2.7 the Outcome Standards for RTOs, as well as Standard 10 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Note that mechanisms for providing feedback is addressed in our Quality Assurance Policy and Associated Procedures.

POLICY STATEMENTS

APPROACH

Complaints may be made against London College, its trainers and assessors and other staff, a learner of London College, as well as any third party providing services on behalf of London College including education agents.

Complaints can be in relation to any aspect of London College's services provided.

Appeals can be made in respect of any decision made by London College. An appeal is a request for London College decision to be reviewed in relation to a matter, including assessment appeals.

In managing complaints, London College will ensure that the principles of natural justice and procedural fairness are adopted at every stage of the complaint process. This means reviewing each complaint or appeal in an objective and consistent manner.

London College will appoint relevant person/s to manage complaints and appeals.

The internal complaints and appeals process will be conducted at no cost to students.

Potential causes of complaints and appeals will be investigated, and corrective and preventative action will be taken in relation to complaint and appeals. Complaints and appeals will also be seen as an opportunity for improvement.

All individuals, including third parties will be informed of allegations made and will have the opportunity to present their case.

Nothing in this policy and procedure limits the rights of an individual to take action under Australia's Consumer Protection laws and it does not circumscribe an individual's rights to pursue other legal remedies.

London College encourages complainants to first seek to address the issue informally by discussing it with the person involved. However, if the person is not comfortable with this or has tried this unsuccessfully, they are to follow the procedures below.

All records of complaints and appeals will be kept by London College and entered into the complaints and appeals register.

COMPLAINTS AND APPEALS PROCESS

Complaints and appeals are to be made as follows:

- Submit complaint or appeal in writing using the complaints and appeals form. The complaints and appeals form outlines the information that should be provided.
- Submit complaint within 30 calendar days of the incident or in the case of an appeal within 30 calendar days of the decision being made.

RESPONSE TO COMPLAINTS AND APPEALS

Complaints and appeals will be responded to as follows:

- The complaint or appeal will be acknowledged in writing within 3 working days of receipt.
- Review of the complaint or appeal will commence within 5 working days of receiving the complaints.
- Complaints and appeals will be finalised as soon as practicable or within 30 calendar days.
- Where the complaint or appeal is complex and is expected to take more than 60 calendar days to process, London College will write to inform the complainant or appellant of this including the reasons for such. Following this update, regular updates will be provided of progress.
- The outcomes of the complaints and appeals process will be communicated in writing to the person making the complaint or appeals. This will also include the reasons for the outcome.

COMPLAINTS AND APPEALS HANDLING

Each individual involved in the complaint may have a support person of their choice present at any meetings to resolve the complaint or appeal.

An independent assessor will be identified to conduct a review of an assessment decision that is being appealed.

ENROLMENT DURING A COMPLAINTS PROCESS

Domestic students' enrolment will be maintained throughout the complaints and appeals process unless the complaint is in relation to misconduct.

International students' enrolment will also be maintained throughout the internal appeals processes without notifying DET via PRISMS of a change in enrolment status.

Additionally, for international students:

- if the appeal is against London College's decision to report the student for unsatisfactory course progress or attendance, the student's enrolment will be maintained until the external process is completed and has supported or not supported London College's decision to report.
- if the appeal is against London College's decision to defer, suspend or cancel a student's enrolment due to misbehaviour, London College will notify DET via PRISMS of a change to the student's enrolment after the outcome of the internal appeals process.

INDEPENDENT APPEAL PROCESS

Where the internal process has failed to resolve the complaint or appeal, the matter will be referred to an independent mediator.

For domestic students, all associated costs are to be met by the complainant/appellant unless it is London College that made the decision to appoint the independent party.

The independent party recommended by London College for cases involving domestic students is the Resolution Institute. However, another mediator of the student's choice can be appointed.

For international students, the external mediator is the Overseas Students Ombudsman (OSO). International students can access the OSO at no cost in relation to matters that cannot be resolved through internal processes. Further information and contact details are included below.

During the mediation process, London College will cooperate in full and commits to immediately implement the decision or recommendation made by the external mediator and/or take preventative or corrective action required by the decision or recommendation.

All actions taken will be communicated in writing to students.

INFORMATION ABOUT EXTERNAL BODIES TO WHOM COMPLAINTS CAN BE MADE

Complaints can also be made to the organisations indicated below:

NATIONAL TRAINING COMPLAINTS HOTLINE:

The National Training Complaints Hotline is a national service for consumers to register complaints concerning vocational education and training. The service refers consumers to the appropriate agency/authority/jurisdiction to assist with their complaint. Access to the Hotline is through:

Phone: 13 38 73, Monday–Friday, 8am to 6pm nationally

Email: ntch@education.gov.au

AUSTRALIAN SKILLS QUALITY AUTHORITY (ASQA):

Complainants may also complain to London College's registering body, Australian Skills Quality Authority (ASQA). It is important to understand that ASQA does not act as an advocate for individual students and is not responsible for resolving disputes between students and training providers. ASQA only uses information from all complaints as intelligence to inform regulatory activities. More information can be found at: <https://www.asqa.gov.au/complaints>

THE OVERSEAS STUDENT OMBUDSMAN (OSO):

International students may complain to the OSO about a range of circumstances including:

- being refused admission to a course;
- course fees and refunds;
- being refused a course transfer;
- course progress or attendance;
- cancellation of enrolment;
- accommodation or work arranged by London College;
- incorrect advice given by an education agent;
- taking too long in certain processes such as issuing results; and/or

- not delivering the services indicated in the Offer Letter and Student Agreement.

More information can be found at:

<https://www.ombudsman.gov.au/complaints/international-student-complaints>

PROCEDURES

1. PROCESS COMPLAINTS AND APPEALS

- 1.1 File the complaints and appeals form received.
- 1.2 Send out an acknowledgement within 3 working days of receiving the complaint or appeal.
- 1.3 Record details of the complaint or appeal on receipt on the complaints and appeals register.
- 1.4 Determine whether the complaint or appeal can be resolved quickly and easily. If so, take immediate action to resolve the complaint or appeal and inform the student in writing of the outcome.
- 1.5 If the complaint is more complex, organise relevant staff to review the complaint and commence investigation.
- 1.6 Inform the complainant or appellant within 5 days of receiving the complaint that the investigation will commence or of the action that will occur in the case of simple complaints.
- 1.7 Conduct an investigation that includes:
 - checking of all facts and accuracy of information
 - requesting further information as required
 - organising a meeting with the complainant/appellant
 - identifying relevant corrective/preventative action
 - confirming a solution.
- 1.8 Where the matter is an appeal about an assessment decision, the investigation process will include an independent review of the assessment evidence and decision by another assessor. A relevant independent assessor should be organised.
- 1.9 The investigation will be completed within 30 days, or if it is considered that it will take longer to than 60 calendar days to process, London College will write to inform the complainant or appellant of this including the reasons for such. Following this update, regular updates will be provided of progress.

- 1.10 Where the process finds in favour of the student, organise a management meeting to discuss:
- the process and its outcome; and
 - actions to be taken to implement the decision, including both corrective/preventative actions.
- 1.11 Following the meeting, agreed actions will be immediately implemented.
- 1.12 Update the complaints and appeals register.
- 1.13 Once the investigation is complete, the complainant or appellant will be informed in writing of the outcome. Where the response is in relation to a complaint, the letter will advise that the internal appeals process may also be accessed.
- 1.14 Archive the complaint or appeal documentation.

2. ORGANISE EXTERNAL APPEALS

- 2.1 In cases where the student has organised the mediator, it will be responding to the mediator's requests.
- 2.2 Cooperate with all requirements of the mediator, providing all information as required.
- 2.3 Where the mediator finds in favour of the student, organise a management meeting to discuss:
- the external process and its outcome; and
 - actions to be taken to implement the decision, including both corrective/preventative actions.
- 2.4 Following the meeting, agreed actions will be immediately implemented.
- 2.5 Advise the student of the action that London College will take in response to the external mediator's decision.
- 2.6 Where the external mediator support London College's decisions regarding international students, for example, in relation to cancellation, notify DET via PRISMS.

RESPONSIBILITIES

The CEO is responsible for:

- investigating complaints and appeals
- making decisions about complaints and appeals in conjunction with others.

The Academic Manager is responsible for:

- investigating complaints and appeals
- making decisions about complaints and appeals in conjunction with others
- facilitating external decisions.

The Administration and Student Support Officer is responsible for:

- processing complaints and appeals forms
- filing all documentation.

COURSE PROGRESS AND ATTENDANCE POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensuring international students enrolled in both VET and ELICOS courses maintain satisfactory course progress and attendance throughout their studies to ensure they can complete their course within the required duration as specified in their confirmation of enrolment (CoE). This policy and associated procedures also outline the procedures for managing unsatisfactory progress.

This policy and associated procedures meet the requirements of Standard 2.3 the Outcome Standards for RTOs, as well as Standard 8 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

POLICY STATEMENTS

OVERVIEW

London College monitors international students' course progress and attendance to ensure they are able to complete their course within the required duration.

The duration of the course as specified on the student's CoE will never exceed that registered on the CRICOS register.

London College advises students before they commence their course of the requirements to achieve satisfactory course progress and attendance, including that students who do not meet course progress requirements are at risk of having their visas cancelled. This advice is included in the International Student Handbook, Course Brochure and within the Orientation.

All records of course progress and monitoring will be kept.

MONITORING COURSE PROGRESS AND ATTENDANCE

A number of strategies will be used to determine whether a student is at risk of, or is making unsatisfactory progress and attendance.

Course progress and attendance is monitored during each study term period as follows:

- By reviewing satisfactory completion of assessments (see individual VET assessments and ELICOS curriculum for further details regarding assessment requirements).
- By reviewing the student's attendance record to ensure that they attend a minimum of 80% of their scheduled classes and have not been absent for more than 5 consecutive days without approval for a leave of absence.
- By assessing the student's participation in class.

Course progress monitoring will determine the need for a student to participate in an intervention strategy. London College commits to an early intervention approach.

A student enrolled in a VET course will be deemed at risk and be required to participate in an intervention strategy if they:

- have an overall result of Not Yet Competent for 50% or more of the units (VET students)
- do not attend classes on a regular basis
- do not participate in learning activities/assessments

A student enrolled in an ELICOS will be deemed at risk and be required to participate in an intervention strategy if they:

- do not participate in a formative or summative assessment test
- have not achieved a passing rate on a summative assessment task at the mid-point of the study period
- are not maintaining satisfactory attendance of at least 80%.

All course progress and attendance monitoring is achieved by reviewing data on the student management system.

INTERVENTION STRATEGY

Students who are identified at risk of not meeting course progress and attendance requirements are required to participate in an intervention strategy.

The intervention strategy will be developed to meet the student's needs and documented in an Intervention Form.

Students who are identified as being at risk will be informed in writing that they are at risk. This will be in the form of two formal warning letters and an intention of notice to report as follows:

- First warning letter: after failing 50% or more unit of competencies of a unit/s following resubmission in one study term period and/or not meeting a minimum of 80% attendance requirements.
- Second warning letter: continue to be failing more unit of competencies (50% or more) in the following study term period following resubmission and/or not meeting minimum of 80% attendance requirement despite an intervention strategy.
- Notice of intention to report: after failing 50% or more unit of competencies following resubmission in the 3rd term period consecutively and/or not meeting minimum of 80% attendance requirement despite an intervention strategy.

EXCEPTIONS

An exception may be made where a student is attending at least 70% of the course contact hours and is maintaining satisfactory progress.

EXTENSION TO AN EXPECTED COURSE DURATION

Extensions to the course duration specified on the CoE will be allowed if:

- compassionate or compelling circumstances apply and demonstrable evidence of such is provided
- where an intervention strategy is in place (or is about to be implemented) for the student because they are at risk of not meeting course progress or attendance requirements.

Students are advised to contact the DHA to seek advice on their student visa as an extension may result in cancellation.

REPORTING

Where a student has demonstrated unsatisfactory course progress and/or attendance in a study period despite interventions implemented, London College will:

- notify the student in writing of the intention to report the student for unsatisfactory course progress and/or attendance
- inform the student of the reasons for the intention to report
- advise the student of their right to dispute the decision by accessing London College's Complaints and Appeals Policy Procedure within 20 days of receiving the notice of intention to report.

London College will only report unsatisfactory course progress or unsatisfactory course attendance in PRISMS if:

- the internal and external complaints processes have been completed, and the decision or recommendation supports the registered provider; or
- the overseas student has chosen not to access the internal complaints and appeals process within the 20 working day period; or
- the student has chosen not to access the external complaints and appeals process: or
- the overseas student withdraws from the internal or external appeals processes by notifying the registered provider in writing.

All records will be kept on the student's file including warning letters and the notice of intention to report.

PROCEDURES

1. ASSESS COURSE PROGRESS AND ATTENDANCE

- 1.1 Review data from student management system on a weekly basis to determine if students are at risk of not meeting course progress requirements as per the definitions in the policy.
- 1.2 Check and record student attendance daily using an Attendance Sheet, the results of which are entered into the Student Management System. An attendance rate is calculated each week.
- 1.3 Contact student via SMS and email if the student has been absent for more than 5 consecutive days without approval or they will not be able to achieve 80% attendance. This

should be repeated until the student responds. Inform the student that their immediate attendance is required and they will receive a First Warning Letter as specified below.

- 1.4 Review data from student management system on a weekly basis to determine if students are at risk of not meeting course progress requirements as per the definitions in the policy.

2. PROVIDE FIRST WARNING AND COMMENCE INTERVENTION STRATEGY

- 2.1 Send the student a First Warning Letter of Unsatisfactory Course Progress/Attendance which includes an invitation to attend a meeting to discuss the issue. Include the letter on the student's file.
- 2.2 Use the Intervention Form to guide the meeting with the student.
- 2.3 Document agreed interventions on the Intervention Form and implement immediately. Include the Intervention Form on the student's file.
- 2.4 Monitor progress through regular communication and document progress on form.
- 2.5 In consultation with the student, adjust the intervention if required and update the Intervention Form.
- 2.6 Sign off on form when the intervention is complete and the student is meeting course progress/attendance requirements.

3. PROVIDE SECOND WARNING

- 3.1 Where the student is still not meeting course progress/attendance requirements, send the student a Second Warning Letter of Unsatisfactory Course Progress/Attendance, which includes a further invitation to attend a meeting to discuss the issue. Include the letter on the student's file.
- 3.2 Use the Intervention Form to guide the meeting with the student.
- 3.3 Advise the student that despite the interventions agreed to, they have still not been making progress. Identify their reasons for such and document in the progress report section of the Intervention Form.
- 3.4 Document any agreed adjusted interventions on the Intervention Form and implement immediately.
- 3.5 Monitor progress through regular communication and document progress on form.
- 3.6 Sign off on form when the intervention is complete and the student is meeting course progress/attendance requirements.

4. ADVISE OF NOTICE OF INTENTION TO REPORT

- 4.1 Where the student is still not meeting course progress/attendance requirements, send the student a Notice of Intention to Report for Unsatisfactory Course Progress/Attendance.

- 4.2 If the student does not appeal against the decision to report them or if their appeal is unsuccessful, report the student via PRISMS for breach of course progress requirements.
- 4.3 Complete all actions associated with cancellation such as removal of student's email account, access to London College's property and so on.

RESPONSIBILITIES

The Academic Manager is responsible for:

- reviewing data to check course progress and attendance
- conducting meetings with students and developing and monitoring intervention strategies
- reviewing student appeals in relation to course progress
- reporting students through PRISMS.

The Administration and Student Support Officer is responsible for:

- issuing warning letters and notices of intention to report.

Trainers and assessors are responsible for:

- notifying the Academic Manager of students they consider to be having difficulties with course progress and/or attendance

DEFERRAL, SUSPENSION AND CANCELLATION POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to managing the enrolment of international students, specifically deferrals, suspensions and cancellations, and ensuring all required information about enrolments is entered into PRISMS.

This policy and associated procedures meet the requirements of Standard 9 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

POLICY STATEMENTS

STUDENT-INITIATED DEFERRAL OR SUSPENSION OR CANCELLATION

International students can defer or suspend their studies. London College allows the deferral or suspension of studies where evidence of compassionate or compelling circumstances can be provided by students.

Evidence of compassionate or compelling circumstances will be considered as part of the decision about suspension or cancellation.

Deferrals and leave of absences will be approved for up to 12 months. However, following this the student's enrolment will be cancelled.

International students may withdraw from their course at any time. Where an international student has not already completed six months of their principal course of study, their application will be assessed as per London College's Course Transfer Policy and Associated Procedures. International students are entitled to a refund as per London College's Fees and Refunds Policy and Associated Procedures.

PROVIDER-INITIATED SUSPENSION OR CANCELLATION

A student's enrolment may be cancelled or suspended by London College in a range of circumstances:

- misbehaviour (i.e., not abiding by the Student Code of Conduct as outlined in this Handbook)
- not paying course fees
- not meeting course progress and attendance requirements.

Not paying course fees and not meeting course progress and attendance requirements will be managed as documented in the Fees and Refunds and Course Progress and Attendance Policy and Associated Procedures.

Any student who breaches the Code of Conduct as applicable to expected behaviour will be immediately suspended. Their case will be considered during the period of suspension and the student may then be reinstated or have their enrolment cancelled.

Where any of the above circumstances apply, the student will be contacted in writing with regard to the intended suspension or cancellation and the reasons for this.

Students will be able to access the Complaints and Appeals Policy and Procedure to appeal the decision within 20 working days of receipt of the decision.

Students will not be reported until the internal appeal process is complete, unless their health and wellbeing or that of others could be at risk.

Students are advised to contact the DHA to seek advice on their student visa.

PROCEDURES

1. PROCESS DEFERRALS

- 1.1 Provide Deferral Application Form to students who request deferral.
- 1.2 Assess Deferral Application Form and supporting evidence to confirm that compassionate or compelling circumstances exist.
- 1.3 Complete assessment and advise student of outcome within 5 working days of receipt.
- 1.4 Where the application for deferral is approved, advise the student in writing of such.
- 1.5 Where the application is not approved, advise the student in writing of such indicating the reasons, any refunds due and advising them of their right to appeal the decision within 20 working days.
- 1.6 For approved deferrals, report a student course variation (SCV) on PRISMS within 31 days of the request being approved and according to the instructions provided in the PRISMS user guide.
- 1.7 Issue the updated CoE to the student.

2. PROCESS STUDENT-INITIATED SUSPENSION OF ENROLMENT

- 2.1 Provide Suspension Application Form to students who request suspension.
- 2.2 Assess Request for Suspension Form and supporting evidence to confirm that compassionate or compelling circumstances exist.
- 2.3 Complete assessment and advise student of outcome within 5 working days of receipt.
- 2.4 Where the application for suspension is approved, advise the student in writing of such.
- 2.5 Where the application is not approved, advise the student in writing of such indicating the reasons, any refunds due and advising them of their right to appeal the decision within 20 working days.
- 2.6 For approved suspensions, report a student course variation (SCV) on PRISMS within 31 days of the request being approved and according to the instructions provided in the PRISMS user guide.
- 2.7 Issue the updated CoE to the student.

3. PROCESS STUDENT-INITIATED CANCELLATION OF ENROLMENT

- 3.1 Provide Withdrawal Application Form to students who request to withdraw. Ensure that this is only provided to students who have completed more than six months of their principal course of study. Otherwise, the student will need to complete a Release Application Form.
- 3.2 Review Withdrawal Application Form to ensure all details have been provided.
- 3.3 Notify the student in writing within 5 working days of receipt of application of confirmation of their withdrawal and any refund as application as per London College's Fees and Refunds Policy and Associated Procedures.
- 3.4 Record the student's withdrawal on the SMS.
- 3.5 Report Student Notified Cessation of Studies on PRISMS within 31 days of the withdrawal being processed and according to the instructions provided in the PRISMS user guide.

4. MANAGE PROVIDER-INITIATED CANCELLATION OF ENROLMENT

- 4.1 Where a student misbehaves (i.e., they contravene the Student Code of Conduct), immediately investigate the incident.
- 4.2 Where the incident is considered serious to warrant further investigation, inform the student in writing of the suspension including the reasons why and the dates from which the suspension applies, as well as their right to appeal the decision within 20 working days of receiving the notice.
- 4.3 Further investigate the student's misbehaviour.
- 4.4 Inform any other relevant agencies of the issue concerning the student such as in the case of fraud or violence.
- 4.5 Where the investigation deems the student can be reinstated, advise the student in writing that their suspension is lifted.
- 4.6 Where the investigation deems the student's behaviour as so serious that they cannot be reinstated, advise the student in writing of the cancellation of their enrolment, including the reasons for the decision.
- 4.7 Record the student's withdrawal on the SMS.
- 4.8 Report provider decision to cease enrolment for disciplinary reasons on PRISMS within 31 days of the withdrawal being processed and according to the instructions provided in the PRISMS user guide.

RESPONSIBILITIES

The Academic Manager is responsible for:

- investigating student misbehaviour
- making decisions regarding student misbehaviour and cancellation
- reporting decisions on PRISMS regarding provider-initiated suspension and cancellation.

The Administration and Student Support Officer is responsible for:

- assessing deferral requests and reporting deferrals on PRISMS
- assessing suspension requests and reporting suspensions on PRISMS
- processing withdrawals.

TRAINING AND ASSESSMENT

Policies and associated procedures in this section:

- Training and Assessment Policy and Associated Procedures
- Teaching and Assessment Policy and Associated Procedures
- Plagiarism Policy and Associated Procedures
- Course Transfer Policy and Associated Procedures.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Training and Assessment Strategy Template
- Training and Assessment Strategy Quality Review Tool
- Industry Survey
- Industry Consultation Register
- Industry Consultation Plan
- Learning Resources Quality Review Tool
- Assessment Review Tool
- Validation Schedule – VET Courses
- Assessment Validation Tool – VET Courses
- Assessment Moderation Tool – ELICOS Courses
- Sample Assessment Review Checklist
- Moderation Schedule – ELICOS Courses
- Transition Plan
- Release Letter
- Application for Release Form
- Internal Course Transfer Application Form.

The documents above can be found in the *Training and Assessment Supporting Documents* folder.

TRAINING AND ASSESSMENT POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensure that high quality training and assessment is provided and which engages students and enables them to attain nationally recognised, industry relevant competencies.

This policy and associated procedures meet the requirements of Standards 1.1, 1.2, 1.3, 1.4, 1.5, 1.8, and 2.5 of the Outcome Standards for RTOs, as well as Standard 11 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

POLICY STATEMENTS

TRAINING

All training provided by London College is consistent with the requirements of the training product.

London College delivers training in the mode that will allow students to develop the required skills and knowledge consistent with the training product.

London College provides training that is structured and paced in a way that helps students progress, giving them enough time for learning, practice, feedback, and assessment.

Training methods, activities, and resources are designed to engage students and enhance their understanding.

London College ensures that where the training product requires work placements or other community-based learning, student will be able to gain the necessary skills and knowledge in that setting.

London College develops and implements a range of systems and documentation to ensure that training is engaging, well-structured and enables students to attain skills and knowledge consistent with the training product including training and assessment strategies, session plans and work placement resources.

INDUSTRY ENGAGEMENT

London College's training and assessment practices and strategies are informed by industry engagement to ensure that training and assessment reflect current industry practices.

London College identifies and then engages with relevant industry, employer and/or community representatives to seek their advice and feedback on training and assessment practices and strategies.

London College uses this advice and feedback to inform changes to training and assessment practices and strategies.

ASSESSMENT

London College implements an assessment system that ensures that assessment (including RPL):

- meets the requirements of the relevant training product.
- is conducted in accordance with the Principles of Assessment and Rules of Evidence (see definitions in this document).

London College reviews assessment tools prior to use to ensure assessment can be conducted consistent with the principles of assessment and rules of evidence. Assessment tools are updated as required based on the outcomes of the review.

London College conducts assessment validation to meet the requirements of the Outcome Standards for RTOs.

London College retains completed student assessment items for at least two years following the student's completion of the training product.

FACILITIES, RESOURCES AND EQUIPMENT

London College identifies and documents the facilities, resources and equipment required to deliver the training product, including which of these will be provided by London College or third parties as relevant.

London College has strategies in place to ensure:

- the ongoing suitability and safety of all facilities, resources and equipment.
- that students have access to all of the facilities, resources and equipment required to participate in training and assessment.

London College identifies and manages risks associated with facilities, resources and equipment used for work placements, or other community-based learning.

Resourcing regarding staffing and student support is addressed in our Staffing Policy and Associated Procedures and Student Support Policy and Associated Procedures.

LEARNING ENVIRONMENT

London College ensures that the learning environment provided promotes and support the diversity of all students. London College identifies and implements strategies to foster a safe and inclusive learning environment for all students, as well as a culturally safe learning environment for First Nations people.

TRANSITION OF TRAINING PRODUCTS

London College ensures that:

- where a training product on its scope of registration is superseded, all training and assessment for students is completed and the relevant AQF certification documentation is issued or that students are transferred into its replacement, within a period of one year from the date the replacement training product was released on www.training.gov.au.

- where an AQF qualification is no longer current and has not been superseded, students' training and assessment is completed and the relevant AQF certification documentation issued within a period of two years from the date the AQF qualification was removed or deleted from www.training.gov.au.
- where a skill set, unit of competency, accredited short course or module is no longer current and has not been superseded, students' training and assessment is completed and the relevant AQF certification documentation issued within a period of one year from the date the skill set, unit of competency, accredited short course or module was removed or deleted from www.training.gov.au.
- a new learner does not commence training and assessment in a training product that has been removed or deleted from the National Register.

It is noted that the requirements above do not apply where a training package requires the delivery of a superseded unit of competency.

THIRD PARTIES

- All third parties who deliver training and assessment on London College's behalf will be required to enter into a third-party agreement with London College.
- London College will monitor the provision of services by third parties to ensure services comply with the Outcome Standards for RTOs.
- Education agent arrangements are addressed by the Education Agent Policy and Associated Procedures.

PROCEDURES

1. DEVELOP TRAINING AND ASSESSMENT STRATEGIES (TAS)

- 1.1 Identify suitable training products for inclusion on London College's scope through research of workforce/target client needs. Document research as a form of industry engagement.
- 1.2 Develop a training and assessment strategy using Training and Assessment Strategy template. Follow the prompts in each section of the Training and Assessment Strategy template to develop a comprehensive, compliant TAS.
- 1.3 Use and complete the Training and Assessment Strategy Quality Review Tool to check that the Training and Assessment Strategy meets requirements, including meeting the requirements of the training product, utilising a suitable mode of delivery, providing sufficient time for instruction, practice, feedback and assessment, and utilising a suitable environment for work placements or other community-based learning.
- 1.4 Procure all the resources required for the implementation of the TAS including:
 - identifying appropriate learning and assessment resources and procuring these following appropriate due diligence checks or developing learning and assessment resources internally. See also the required actions under 3 and 4 about providing quality training and managing the assessment system.

- identifying all facilities, equipment and resources required and procuring these accordingly.
 - developing and completing a resources checklist that identifies all facilities, equipment and resources that the RTO will provide and the quantity of each as relevant. The resources checklist is developed based on the requirements specified in the assessment conditions for each unit of competency.
 - developing and completing an additional resources checklist that identifies all the facilities, equipment and resources that a third party (such as an employer or facility hirer) will provide and the quantity of each as relevant. The resources checklist is developed based on the requirements specified in the assessment conditions for each unit of competency.
 - identifying and documenting equipment and resources that students need to provide and providing this advice in course information for students.
- 1.5 Complete all actions associated with the Training and Assessment Strategy including identifying and procuring all the resources required and engaging with industry.
- 1.6 As relevant, apply for change of scope to RTO/CRICOS registration on ASQAnet following the instructions within ASQAnet and providing required evidence.
- 1.7 Review TAS as per London College's Quality Assurance Policy and Associated Procedures and the process for ongoing industry engagement as outlined below.

2. ENGAGE WITH INDUSTRY

- 2.1 Identify suitable strategies for industry engagement for new courses and develop an industry consultation plan. This will generally include:
- completion of industry surveys with industry experts – these will generally be conducted face to face or over the phone. The results of the surveys will be recorded in the industry survey form, and the expert will be required to sign off on the form
 - an industry research report – this will be developed to identify key skills needs and trends that need to be reflected in the TAS
 - ongoing engagement – for example, staff members' ongoing interactions with industry experts or their engagement with key information sources (such as webinars) that that inform training and assessment practices. These will be documented in the industry consultation register
 - any other input as relevant.
- 2.2 Identify suitable strategies for ongoing industry engagement and include these in the industry consultation plan. This will generally include:
- meeting with work placement providers to seek their input into training and assessment strategies and practices
 - ongoing industry research – documented in a research report

- organising industry focus groups annually. These will include small groups of industry stakeholders who will meet as a group to discuss a range of issues relating to training and assessment strategies and practices.
- 2.3 Identify relevant industry employer and/or community representatives who can provide input into training and assessment strategies and practices by:
- identifying suitable professional associations
 - identifying suitable businesses
 - networking at industry events to identify appropriate contacts
 - using existing contacts.
- 2.4 Contact identified representatives and confirmed their involvement.
- 2.5 Update industry consultation plan with details of representatives who will be involved.
- 2.6 Complete industry engagement as per the strategies identified above and review the feedback from industry engagement and document in the Industry Consultation Register. The review should identify key issues from the industry engagement and actions required to update training and assessment strategies and practices.
- 2.7 Review the feedback from industry engagement and document in the Industry Consultation Register.
- 2.8 Update TAS and other associated documentation based on the industry advice and feedback provided.

3. PROVIDE QUALITY TRAINING

- 3.1 Quality review learning resources using the Learning Resources Quality Review Tool prior to use to ensure they meet the requirements of the training product, can ensure quality training to meet the requirements of the Outcome Standards for RTOs and support the diversity of students.
- 3.2 Use the learning resources to deliver training.
- 3.3 Include an industry expert as part of the training delivery as required. For example, to provide a guest lecture on a specific area related to the trainer.
- 3.4 Regularly seek feedback from trainers and assessors and students on learning resources to ensure continuous improvement.

4. MANAGE ASSESSMENT SYSTEM

- 4.1 Quality review assessments, including RPL tools as relevant, using the Assessment Review Tool prior to use to ensure they meet the requirements of the training product and the principles of assessment and rules of evidence.

- 4.2 Conduct assessment using assessment tools as documented in the TAS, including RPL tools as relevant, and following the instructions included in the assessment tools including RPL tools as relevant.
- 4.3 Include an industry expert as part of the assessment as required. For example, to provide expert feedback as part of a process or observation included in the assessment.
- 4.4 Mark completed student work following the instructions in the assessment tools, including RPL tools.
- 4.5 Complete checks of sample student files to check marking is correct and all associated documentation is signed and dated. Use the Sample Assessment Review Checklist to record findings.
- 4.6 File completed student assessment items for two years following completion.
- 4.7 Archive or delete/shred completed student assessment items after two years following completion.

5. MANAGE FACILITIES, RESOURCES AND EQUIPMENT

- 5.1 Regularly review resources checklists to ensure they are up to date and accurate.
- 5.2 Add additional facilities, resources and equipment to the checklist as required.
- 5.3 Regularly seek feedback from trainers and assessors, students and employers on the suitability of facilities resources and equipment to ensure continuous improvement.
- 5.4 Complete inspections of the training facility as per the Health and Safety Policy and Associated Procedures.
- 5.5 Identify risks relating to work placements, or other community-based learning and include these on a risk register as per the Risk Management Policy and Associated Procedures. As per the risk register, assess each risk and include strategies to manage the identified risks.
- 5.6 Identify suitable strategies for monitoring the suitability and safety of third party provision of facilities, resources and equipment. This may include:
 - Requesting photos or a short video walkthrough of key areas where students are working/training.
 - Participating in a meeting with the third party to seek up to date information on the student's learning environment and any issues or concerns regarding facilities, resources and equipment.
 - Seeking feedback from students and trainers and assessors of the learning environment and access to facilities, resources and equipment.
- 5.7 Document outcomes of monitoring as above in the Continuous Improvement Register.

6. MANAGE THE LEARNING ENVIRONMENT

- 6.1 Identify suitable strategies for promoting and supporting the diversity of students, including fostering a safe and inclusive learning environment for students and culturally safe learning environment for First Nations people. This includes:
- During orientation, informing students about the Student Code of Conduct and obligations relevant to diversity, safety and inclusivity.
 - During induction, informing staff about policies and procedures that to diversity, safety and inclusivity.
 - Requiring staff to complete short training modules relating to discrimination and harassment.
 - Acknowledging country at the commencement of a course.
 - Ensuring trainers and assessors complete ongoing professional development in inclusive teaching strategies.
 - Providing support services as set out in the Student Support Policy and Associated Procedures.
- 6.2 Regularly seek feedback from trainers and assessors, students and employers on the learning environment in terms of whether it promotes and supports diversity to ensure continuous improvement.
- 6.3 Document feedback on the diversity of the learning environment in the Continuous Improvement Register.

7. CONDUCT ASSESSMENT VALIDATION

- 7.1 Develop a validation plan using the Validation Schedule template and noting that each training product will be validated at least once every five years and on a more frequent basis based on awareness of risks to training outcomes, changes to the training product and feedback from students, trainers and assessors and industry.

The Validation Schedule must include:

- the training products that will be the focus of the validation
- the rationale for validating the identified training products
- when validation will occur
- sample size of assessments to be validated
- who will lead and participate in the validation noting that the validation team will collectively have:
 - industry competencies, skills and knowledge relevant to the training product
 - a practical understanding of current industry practices relevant to the training product
 - one of the credentials for validation specified in the Credential Policy.

It is also noted that validation may be undertaken by persons involved in the design or delivery and assessment of the training product being validated, as long as they are not solely responsible for determining the outcomes of validation.

Additionally, if an AQF qualification or skill set from the Training and Education Training Package that enables individuals to make assessment judgements is being validated, the person/s undertaking validation must be independent and not employed or subcontracted by London College to provide training and assessment and has no other involvement or interest in London College and validation must occur following completion of training and assessment by the first cohort of students.

- 7.2 Organise the validation team as per the Validation Schedule requirements. This means selecting team members and inviting them to participate in the validation process, as well as securing their agreement to participate.
- 7.3 Notify the validation team of all validation details, including date, time and location.
- 7.4 Conduct validation for each unit as per the Validation Schedule and using London College's Validation Tool.
- 7.5 Record the findings of the validation within the Validation Tool and Validation Schedule.
- 7.6 Update assessments/reassess students based on validation findings.
- 7.7 Record findings on the Continuous Improvement Register.

8. MANAGE TRANSITION OF TRAINING PRODUCTS

- 8.1 Identify superseded, deleted or expired training products by regularly reviewing the National Register and by being on the mailing list of the relevant Jobs and Skills Council.
- 8.2 Develop a transition plan using the Transition Plan template for superseded training products to include:
 - identification of students who can and can't complete within one year of the date of the training product being superseded
 - a plan for transitioning relevant students to the new qualification
 - identification of new resource requirements.
 - procurement of new resources requirements
 - submission of an application for change of scope where the training product is not equivalent
 - communication plan for all students and staff.
- 8.3 Implement the transition plan.

9. MANAGE THIRD PARTIES RESPONSIBLE FOR TRAINING AND/OR ASSESSMENT AND TRAINING SUPPORT SERVICES

- 9.1 Conduct due diligence of any third party that may be suitable for a third party agreement. This should also include checking that the third party is suitable as per the General Direction – third party arrangements.
- 9.2 Provide third party agreement for signing to any third party deemed suitable following due diligence.
- 9.3 Conduct third party induction following signing of agreement.
- 9.4 Advise ASQA via ASQAnet within 30 days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first.
- 9.5 Monitor third party at agreed intervals.
- 9.6 Where third party monitoring or feedback from students indicates that the third party may not be meeting the terms of their agreement, immediately investigate the issue.
- 9.7 Where the investigation confirms that the provider has not complied with their responsibilities as per the Third Party Agreement (except in the case of where the third party has engaged in false or misleading practices – see the following section), contact the third party in writing to advise the corrective actions that are required.
- 9.8 Implement relevant corrective actions.
- 9.9 Monitor corrective actions as required to ensure they are implemented.
- 9.10 File all documentation associated with monitoring.

10. TERMINATE THIRD PARTY CONTRACTS

- 10.1 Where third party monitoring or any other intelligence demonstrates that the third party has engaged in false or misleading practices, immediately send a notice in writing to the agent advising them that their contract is terminated and giving the reasons why.
- 10.2 Advise ASQA via ASQAnet of termination of the agreement and within 30 days of the agreement ending.

RESPONSIBILITIES

The Academic Manager is responsible for:

- identifying training needs and developing training and assessment strategies
- organising and conducting industry engagement
- organising all physical and human resources

- organising scheduling
- assessment file checks
- managing transition of training products
- managing third party arrangements.

The Administration and Student Support Officer is responsible for:

- entering assessment results on the SMS
- filing and archiving student assessments.

Trainers and assessors are responsible for training and conducting assessment and RPL.

TEACHING AND ASSESSMENT POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensure that high quality teaching and assessment is provided to ensure that the requirements of the ELICOS Standards 2018, specifically Standards C1 and P3 – 7 are met. This policy and associated procedures will also ensure that the requirements of Standard 11 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 are met.

POLICY STATEMENTS

TEACHING ELICOS

London College ensures that all students are provided with optimal opportunities for achieving successful outcomes through:

- developing and implementing course curriculum that addresses all the requirements of Standard C1
- placing students in a class that is appropriate to their current language proficiency level, learning goals and needs (see Student Enrolment and Completion Policy and Associated Procedures)
- providing student support required (see Student Support Policy and Associated Procedures)
- ensuring teacher to student ratios do not exceed 1:18 per class
- informing students of the outcomes to be achieved from the course overall, as well as for each learning block
- ensuring that there are processes in place so that teaching is customised to meet student needs and teaching and content is based on the latest developments in English language teaching
- ensuring teaching records are kept and are accessible
- continuously improving courses.

RESOURCING

London College ensures that it is sufficiently resourced through:

- ensuring sufficient and qualified teachers to provide teaching and assessment to students
- ensuring sufficient student support is in place through its Student Support Policy and Associated Procedures
- identifying and procuring quality teaching and assessment resources for the delivery of teaching and assessment
- identifying and procuring the required facilities and equipment to deliver teaching and assessment. Facilities must meet the requirements of ELICOS Standard P7.3.

ASSESSMENT ELICOS

London College ensures that all students are provided with optimal opportunities for achieving successful outcomes through:

- developing and implementing both formative and summative assessment
- ensuring that assessment outcomes are clearly identified and documented as relevant to progress throughout the course
- ensuring that assessment is valid, reliable, fair and flexible and includes clear criteria for decision making
- moderating assessment outcomes
- ensuring that students are informed of their assessment outcomes and progress.

London College conducts assessment moderation that meets the requirements of ELICOS Standards P4.1.

Assessment evidence is retained and meets ELICOS Standards requirements (P3.3) regarding recordkeeping.

PROCEDURES

1. DEVELOP AND IMPLEMENT COURSE CURRICULUM

- 1.1 Develop course curriculum that meets the requirements of ELICOS Standard C1.1.
- 1.2 Identify appropriate learning and assessment resources in the curriculum. Learning and assessment resources should:
 - be suitable for the target group and each level of the course
 - enable varied learning activities and teaching methodology
 - include a range of multimedia
 - reflect new developments in TESOL theory and practice and trends
 - be able to be adapted to meet changes in course offerings and student profiles.
- 1.3 Procure and/or develop learning and assessment resources identified in the curriculum.
- 1.4 Review learning and assessment resources prior to use and adapt as required.
- 1.5 Regularly review the delivery of courses and associated resources as per London College's Quality Assurance Policy and Associated Procedures. This will also include regular updates of the course curriculum.

2. MANAGE RESOURCING

- 2.1 Identify equipment and support resources required to support ELICOS teaching including:
- educational and computer technologies
 - materials for independent students
 - references for teachers that reflect contemporary knowledge of the theory and practice of TESOL.
- 2.2 Procure all resources identified.
- 2.3 Catalogue all additional material for independent study so that students and teachers can easily see what is available.
- 2.4 Develop timetable to ensure only 18 students are in each class.
- 2.5 Brief teachers during their induction to:
- ensure that students are informed of the outcomes to be achieved from the course overall, as well as the specific learning outcomes for each block
 - ensure that their teaching is adapted to meet student needs
 - regularly research course content and developments in English language teaching on to meet student needs.
- 2.6 Retain all records so that they are accessible to all relevant staff. Records are to be retained electronically and must include but are not limited to:
- learning and assessment resources (that include documented learning and assessment outcomes)
 - timetables
 - session plans
 - student assessments.
- 2.7 Regularly review resources to identify updates needed.

3. MANAGE ASSESSMENT SYSTEM

- 3.1 Conduct assessment using provided identified formative and summative assessment tools and following the instructions included in the assessment tools.
- 3.2 Mark completed student work following the instructions in the assessment tools.
- 3.3 Inform students of assessment outcomes and their progress based on results.
- 3.4 Complete checks of sample student files to check marking is correct and all associated documentation is signed and dated.
- 3.5 File completed student assessment items electronically and keep for at least 2 years.

3.6 Archive completed student assessment items after two years.

4. CONDUCT ASSESSMENT MODERATION

- 4.1 Develop a moderation plan using Moderation Schedule – ELICOS Courses.
- 4.2 Organise the moderation team as per the Moderation Schedule requirements.
- 4.3 Make arrangements for the moderation and notify moderation team members.
- 4.4 Conduct moderation as per the Moderation Schedule and using the Assessment Moderation Tool.
- 4.5 Update assessments/reassess students based on moderation findings.
- 4.6 Record findings on the Continuous Improvement Register.

RESPONSIBILITIES

The Academic Manager is responsible for:

- developing/procuring course curriculum
- organising all physical and human resources
- ensuring all ELICOS resources reflect current knowledge and trends
- organising scheduling
- managing assessment moderation.

The Administration and Student Support Officer is responsible for:

- entering assessment results on the SMS
- filing and archiving student assessments.

ELICOS teachers are responsible for teaching and conducting assessment.

PLAGIARISM POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensuring that plagiarism, cheating and collusion do not occur.

This policy and associated procedures outline London College's detection methods on the usage of Artificial Intelligence (AI) and Large Language Models (LLMs) in student assessment.

This policy and associated procedures assists in ensuring the requirements of Standard 1.5 of the Outcome Standards for RTOs are met.

POLICY STATEMENTS

STUDENT INTEGRITY AND HONESTY

London College is committed to upholding standards of student integrity and honesty in regard to the assessment of their work and places value in the declarations of authenticity made by students.

Students are expected to act with integrity at all times and only submit work that is their own, or that has been appropriately referenced and includes acknowledgements of all texts and resource materials utilised in the development of the work.

Students and staff have a duty to ensure they gain the necessary understanding of how to correctly acknowledge and cite references and resources so as to minimise the incidents of plagiarism and cheating and the allegations of such.

Prior to commencing studies, students are provided with information about academic integrity, including information about expectations regarding AI and LLM usage as well as procedures for dealing with academic dishonesty and associated consequences, in London College's Student Handbook and during orientation.

UNACCEPTABLE BEHAVIOUR

From time to time, there may be incidents of student plagiarism, cheating and collusion which London College is required to act upon in order to uphold the value of assessment outcomes and the reputation of the nationally recognised training provided.

Usage of AI/LLM created work is not acceptable in any submission made as part of an official assessment at London College. The use of such tools as aids for the purpose of brainstorming and idea generation are acceptable, but any use of them to generate answers to assessment questions directly is not allowed.

Student plagiarism, cheating and collusion in any form are unacceptable and will be treated seriously by London College.

PROCEDURES

1. CHECK FOR PLAGIARISM, CHEATING OR COLLUSION

- 1.1 Inform students of London College's plagiarism, cheating or collusion expectations which are outlined in the Code of Conduct in the Student Handbook prior to enrolment and during orientation.
- 1.2 Inform students about what is considered acceptable usage.
- 1.3 Upon the submission of all assessment tasks, students are required to sign an Assessment Cover Sheet that includes a declaration of the authenticity of the work. A student may wish to declare use of AI/ LLM and include a summary of what and how AI was used in the assessment.
- 1.4 Check students have completed declaration and if incomplete, request students to sign prior to marking assessment.

2. DETECTION OF PLAGIARISM, CHEATING AND COLLUSION

- 2.1 Conduct initial checks using tools designed to detect plagiarism, cheating and collusion. Methods for detecting plagiarism, cheating and collusion include:
 - identifying uncharacteristic usage of language by students
 - detecting text and formatting that is typically generated by LLM
 - answers that are not related to the actual content/intent of the assessment question; and
 - identifying responses where sources are real, but they aren't relevant to the context.
- 2.2 Use an AI detection tool such as Zero GPT (<https://www.zerogpt.com/>) or Grammarly.
- 2.3 Review findings and consider whether there are sufficient grounds to indicate the student has plagiarised, cheated or colluded. If so, identify whether an assessment is valid, utilising the following methods wherever applicable:
 - Cross reference with the student's written work that has taken place in a face to face setting.
 - Copy a portion of the assessment that has indicators of AI usage into a LLM and determine whether the responses match or are similar.
 - Question the student orally in class about the assessment and determine whether they understand the question and answer in a similar fashion.
- 2.4 Source evidence to support the allegation.

3. RESPOND TO INCIDENTS

- 3.1 Provide the student found to have plagiarised, cheated or colluded with an opportunity to respond to the allegations.

- 3.2 Send a written communication to the student outlining the issues.
- 3.3 In the case of AI/LLM usage, explain to the student what appropriate use is and refer them to the Student Code of Conduct.
- 3.4 Advise the student in writing that they will be required to redo the assessment in full or as a gap assessment and of any associated charges and that in the event of any further instances their enrolment may be cancelled.
- 3.5 Keep all records of the student's involvement in alleged plagiarism, cheating or collusion.

RESPONSIBILITIES

The Academic Manager is responsible for managing plagiarism, cheating and collusion.

Trainers and assessors are responsible for identifying plagiarism, cheating and collusion.

COURSE TRANSFER POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures ensure that London College does not knowingly enrol an international student who wishes to transfer from another registered provider prior to the international student completing six months of their principle course.

This policy and associated procedures meet the requirements of Standard 7 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

POLICY STATEMENTS

OVERVIEW

London College will not knowingly enrol an international student who wishes to transfer from another registered provider's course prior to the student completing six months of his or her principal course except in the case of any of the following circumstances:

- the releasing registered provider or the course in which the student is enrolled has ceased to be registered;
- the releasing registered provider has had a sanction imposed on its registration by ASQA that prevents the student from continuing their principal course at that registered provider;
- the releasing registered provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS;
- any government sponsor of the student considers the change to be in the student's best interest and has provided written support for that change.

ASSESSING COURSE TRANSFER REQUESTS TO OTHER REGISTERED PROVIDERS AND CIRCUMSTANCES WHERE THE TRANSFER REQUEST WILL BE GRANTED

International students who wish to transfer to another registered provider prior to completing six months of their principal course must complete an Application for Release Form and attach a valid offer from another registered provider.

The outcome of the assessment will be provided within 10 working days of receipt of the form and valid enrolment offer. Where the request is granted, a Letter of Release will be provided. The Release Letter will advise students to contact the DHA to seek advice on whether a new student visa is required. Refunds will be in accordance with London College's Fees and Refunds Policy and Procedure.

The transfer request will be granted where any of the following circumstances apply:

- The student will be reported because they are unable to achieve satisfactory course progress at the level they are studying, even after engaging with London College's intervention strategy to assist the overseas student in accordance with Standard 8 (overseas student visa requirements).
- There is evidence of compassionate or compelling circumstances.
- London College fails to deliver the course as outlined in the Offer Letter and Student Agreement.

- There is evidence that the student's reasonable expectations about their current course are not being met.
- There is evidence that the student was misled by London College or an education or migration agent regarding London College or its course and the course is therefore unsuitable to their needs and/or study objectives.
- An appeal (internal or external) on another matter results in a decision or recommendation to release the student.

CIRCUMSTANCES WHERE THE TRANSFER REQUEST WILL NOT BE GRANTED

A transfer request will not be granted where any of the following circumstances apply:

- There are no legitimate compassionate or compelling circumstances.
- The student has not paid their fees.
- The transfer may jeopardise the student's progression through a package of courses.
- The student has recently started studying the course and the full range of support services are yet to be provided or offered to the student.
- The student is trying to avoid being reported to DHA for failure to meet the provider's attendance or academic progress requirements.

Where the request is not granted, the reasons for non-grant of the request will be communicated in writing. The letter will advise the student that they may access the Complaints and Appeals Policy and Procedure to appeal the decision within 20 working days of receipt of the decision.

London College will not finalise the student's refusal status in PRISMS until the appeal process is complete and either finds in favour of London College or until the 20-working day period in which the student can access the complaints and appeals process has passed.

INTERNAL TRANSFER

London College allows students to transfer to other courses offered by London College in any of the following circumstances:

- The course better meets the study capabilities of the student; and/or
- the course better meets the long-term goals of the student, whether these relate to future work, education or personal aspirations; and/or
- the student provides evidence that their reasonable expectations about the current course are not being met.

A transfer to another course within London College will not be granted in any of the following circumstances:

- The transfer may jeopardise the student's progression through a package of courses.
- The student has recently started studying the course and the full range of support services are yet to be provided or offered to the student.
- The student is trying to avoid being reported to DHA for failure to meet the provider's attendance or academic progress requirements.

International students who wish to transfer to another course should complete the Internal Course Transfer Application Form.

The outcome of the student's application for internal course transfer will be provided in writing within 10 working days of receipt of the form. Where the application is not granted, reasons for such will be provided.

RECORD KEEPING

London College will maintain all records of requests for course transfer and documentation associated with the assessment and decision regarding the request. Records will be maintained for a minimum of 2 years following the student's completion or withdrawal from their course.

PROCEDURES

1. MANAGE TRANSFERS IN

- 1.1 On receipt of an application from a student that has not completed six months of their principal course of study, check the student on PRISMS following the information about Standard 7 in the PRISMS user guide and to ensure they have been released from the previous provider.
- 1.2 If the check confirms that the student has been released follow the usual procedures for enrolling a student.
- 1.3 If the check confirms that the student has not been released, advise the student in writing and within 3 working days of receipt of their application that it has not been approved.
- 1.4 File all documentation.

2. MANAGE TRANSFERS OUT

- 2.1 Where a student wishes to transfer to another provider before having completed six months of their principal course of study with London College, provide students with Application for Release form.
- 2.2 Acknowledge receipt of completed forms within 3 working days of receipt.
- 2.3 Review and assess the application provided within 10 working days of receipt. For an application to be approved, supporting documentation must demonstrate that compassionate and compelling circumstances exist.
- 2.4 Advise the student in writing of the outcome of their application, including a Letter of Release where the application is approved. If it is not approved, provide the reasons and advise the student of their right to access the complaints and appeals process.
- 2.5 Record approved releases on PRISMS following the information about Standard 7 in the PRISMS user guide.

- 2.6 Record refusals of release on PRISMS following the information about Standard 7 in the PRISMS user guide.
- 2.7 File all documentation and keep for a minimum of 2 years, after the overseas student ceases to be an accepted student.

3. MANAGE INTERNAL COURSE TRANSFERS

- 3.1 Where a student wishes to transfer to another course within London College, provide students with Internal Course Transfer Application Form.
- 3.2 Acknowledge receipt of completed forms within 3 working days of receipt.
- 3.3 Review and assess the application provided within 10 working days of receipt. For an application to be approved, supporting documentation must demonstrate that there are appropriate reasons for transferring.
- 3.4 Advise the student in writing of the outcome of their application, including a new Offer Letter and Student Agreement where the application is approved. If it is not approved, provide the reasons and advise the student of their right to access the complaints and appeals process.
- 3.5 Advise the student in writing of any refunds due relevant to their existing course.
- 3.6 Record student course variation on PRISMS following the information on student course variation in the PRISMS user guide.
- 3.7 Record refusals of release on PRISMS following the information about Standard 7 in the PRISMS user guide.

RESPONSIBILITIES

The Administration Manager is responsible for:

- managing transfers in and out
- managing internal course transfers.

The Administration and Student Support Officer is responsible for:

- filing course transfer documentation.

COMPLETION

Policies and associated procedures in this section:

- Student Enrolment and Completion Policy and Procedures.

Note that the Policy and Associated Procedures is included in the Enrolment and Support section of this RMS.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Testamur Template
- Record of Results Template
- Statement of Attainment Template.

The documents above can be found in the *Completion Supporting Documents* folder.

Note that ELICOS certification is included within each ELICOS curriculum folder.

REGULATORY COMPLIANCE AND GOVERNANCE

Policies and associated procedures in this section:

- Governance Policy and Associated Procedures.
- Staffing Policy and Associated Procedures
- Third Party Policy and Associated Procedures
- Quality Assurance Policy and Associated Procedures
- Health and Safety Policy and Associated Procedures
- Critical Incident Policy and Associated Procedures
- Privacy Policy and Associated Procedures.

Supporting resources and checklists (not included in this document) that are associated with this phase of the student journey:

- Risk Register
- Staff Interview Form
- Trainer and Assessor Evidence File
- Induction Checklist
- Industry Currency Verification Form for Trainers and Assessors
- Working Under Direction Plan
- Position Description – Academic Manager
- Position Description – CEO
- Position Description – RTO Manager
- Position Description – Trainer and Assessor
- Position Description – ELICOS Teacher
- Position Description – Counsellor
- Position Description – Administration and Student Support Officer
- Professional Development Plan and Log
- Internal Audit Checklist – RTO and CRICOS
- Internal Audit Checklist – RTO, CRICOS and ELICOS
- Internal Audit Report – RTO and CRICOS
- Continuous Improvement Register
- Feedback Form
- Orientation Survey

- Third Party Application Form
- Third Party Agreement Template
- Third Party Monitoring Form.

The documents above can be found in the *Regulatory Compliance and Governance Supporting Documents* folder.

An additional document not referenced above can also be found in this folder. This is the Strategic Business Plan Template that may be used as required.

GOVERNANCE POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to governance.

This policy and associated procedures meet the requirements of Standard 4.1, 4.2, and 4.3 of the Outcome Standards for RTOs, as well as accountability requirements in Compliance requirements and data collection and provision requirements as set out in the Data Provision Requirements 2020.

Note the Staffing Policy and Associated Procedures sets out the recruitment, selection and induction process to ensure that governing persons are suitable to oversee the operation of the RTO, including meeting Fit and Proper Person Requirements, as well as how roles and responsibilities are documented.

POLICY STATEMENTS

PRINCIPLES

London College is committed to effective governance to support the quality and integrity of services provided.

All governing persons are suitable to oversee the operation of the RTO, including satisfying fit and proper person requirements.

All governing persons act diligently and make informed decisions compliance with all regulatory requirements.

Governing persons lead a culture of integrity, fairness and transparency in the delivery of services.

London College defines and documents all roles and responsibilities and ensures that all staff and third parties understand their role and responsibilities, as well as associated legislative and regulatory requirements.

London College identifies and manages relevant risks, including risks to student, staff London College.

London College ensures that all insurances are in place, including public liability insurance.

PROCEDURES

1. DELIVER QUALITY SERVICES THROUGH EFFECTIVE GOVERNANCE

- 1.1 Schedule regular management meetings and record all meeting minutes.
- 1.2 Include an agenda item for management meetings to address ongoing regulatory requirements, including any changes.
- 1.3 Seek advice from experts (for example, legal and accounting) to assist with effective governance as required.
- 1.4 Require all individuals to complete a conflict of interest declaration if a potential or actual conflict arises and log this in the conflict of interest log, including actions to be taken.

2. DEFINE ROLES AND RESPONSIBILITIES

- 2.1 Develop position descriptions for all roles within the RTO as per the Staffing Policy and Associated Procedures.
- 2.2 Develop and update as required an organisation chart that clearly shows all roles within the RTO, including lines of accountability.
- 2.3 Complete the induction process as set out in the Staffing Policy and Associated Procedures to ensure staff, including governing persons, understand their roles, as well as legislative and regulatory requirements relevant to their roles.
- 2.4 Follow the Education Agent Policy and Associated Procedures and Third Party Policy and Associated Procedures to ensure that third parties are aware of their obligations and meet all regulatory requirements.

3. MANAGE RISKS

- 3.1 Identify relevant risks to students, staff and the RTO, including financial risks. Risks can be identified through a range of ways including:
 - Regularly reviewing regulatory information and updates
 - Environmental scanning
 - Self-assessments to identify compliance gaps
 - Feedback from stakeholders
 - Brainstorming sessions.
- 3.2 Document risks on the risk register, including assessing the likelihood and consequences of the risk and strategies to control these risks.
- 3.3 Develop a financial plan that sets out London College financial position and ongoing financial performance and cash flows, as well as strategies that will be used to monitor and oversee London College financial position and ongoing financial performance and cash flows
- 3.4 Regularly update the financial plan as required.
- 3.5 Identify all insurance requirements, including public liability, and maintain insurance as required.

4. MEET DATA COLLECTION AND PROVISION REQUIREMENTS

- 4.1 London College uses the RTO and ESOS obligations checklists published by ASQA to keep track of key dates and meet the required obligations.
- 4.2 London College collects data from students on enrolment using the Application for Enrolment Form and reports this information, as well as competency enrolments delivered, and outcomes achieved. Reporting occurs on the last day of February and through our AVETMISS compliant SMS.

- 4.3 London College submits an Annual Declaration on Compliance each year by the last day of February. Our Annual Declaration on Compliance is completed based on our ongoing compliance auditing and review as set out in our Compliance Schedule.
- 4.4 London College completes a quality indicator annual summary report for calendar year and submit to ASQA by 30 June each year.
- 4.5 London College complies with all other obligations including:
- updating details in ASQAnet when required including:
 - the email and phone number of the CEO if it changes
 - inaccurate information that is included on the CRICOS register as relevant
 - paying the Annual Registration Charge invoice by 31st July each year
 - checking when registration expires and submitting renewals at least 90 days before expiry
 - reporting students through PRISMS including where an international student does not start their course or whose course is terminated within 31 days of the event
 - reporting information in PRISMS for students who change courses, have the duration of their course change, have their course suspended and any other information specified in the ESOS regulations within 31 days of the event
 - pay the TPS levy according to the written notice provided
 - pay the CRICOS Annual Registration Charge by early April each year.
- 4.6 London College cooperates with ASQA at all times and provides accurate and truthful responses to information requests. London College will provide data to ASQA as requested and as per the information included on ASQA's website at:
<https://www.asqa.gov.au/rto/responsibilities/data-collection-and-provision>
- 4.7 London College will notify ASQA in writing (via ASQAnet) as soon as practicable and no later than 10 business days after becoming aware of the following:
- a substantial change to operations or any event that would significantly affect the ability of London College to comply with regulatory requirements, including the Outcome Standards for RTOs.
 - there is a change to the name or contact details of a person who has a degree of control or influence over the management or direction of London College.
 - there are, or are likely to be, other materials changes to the operations of the RTO, including changes of ownership.
- Note that regarding change of ownership, an exception to the above is that ASQA must be informed before a change of ownership takes place and within 90 days of the change of ownership.
- 4.8 London College retains, archives, retrieves and transfers records as required. Record keeping is set out as relevant in each policy and associated procedures and in the event of closure, we will transfer all records as required by ASQA at that time.

STAFFING POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to recruitment, selection, induction and professional development to ensure that there are suitable, qualified and sufficient staff in place.

This policy and associated procedures meet the requirements of Standard 3.1, 3.2, 3.3, 4.1 and 4.2 of the Outcome Standards for RTOs, as well as the Credential Policy and Standard 11 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 and the P6 of the ELICOS Standards 2018.

POLICY STATEMENTS

PRINCIPLES

London College is committed to providing quality training, assessment and support services. We recognise the importance of our human resources in meeting this commitment.

London College is committed to equal opportunity in employment and to providing a work environment that is free from harassment and discrimination.

All decisions about recruitment will be based on merit and according to the position description requirements.

London College will ensure that the best possible staff are attracted by advertising widely all vacant positions.

All governing persons are suitable to oversee the operation of the RTO, including satisfying fit and proper person requirements.

All roles and responsibilities are clearly identified and documented.

London College will identify the number of trainers and assessors and other staff required to deliver services and recruit accordingly.

London College will facilitate access to professional development for all staff. Trainers and assessors will participate in continuing professional development to maintain current skills and knowledge in training and assessment, including engaging and supporting VET students.

London College will recruit training and assessment staff that meet the requirements of Standards 3.2 and 3.3 and the Credential Policy.

London College will ensure that arrangements are in place to ensure the requirements of the Credential Policy are met regarding individuals working towards a training and assessment credential or training and assessing under direction. Note that where the person is actively working towards a training and assessment credential or working under the direction of a trainer or assessor, they can deliver training and contribute to assessment (including conducting assessment and collecting assessment evidence), provided they work under the direction of a trainer or assessor. For those working towards a training and assessment credential, they can make assessment judgements if they meet the requirements set out in 1B of the Credential Policy. For those working under direction, assessment judgements cannot be made.

London College will recruit qualified industry experts to work alongside trainers and/or assessors to conduct the training and/or assessment as required.

PROCEDURES

1. RECRUIT AND SELECT STAFF

1.1 Identify staffing needs. Staffing needs will be identified through:

- regular workforce planning reviews to assess staffing needs based on student enrolment numbers, course demand, and delivery modes (for example, online, face-to-face, blended).
- identifying enrolment projections and intake schedules and then using this information to determine trainer/assessor requirements in advance.
- setting and monitoring trainer and assessor to student ratio benchmarks for different course types and delivery methods. These are included in each Training and Assessment Strategy and will be updated as relevant.
- collecting and analysing data on student outcomes and feedback, trainer and assessor performance and feedback, student support services usage and using this data to identify areas where more staff may be needed or where roles need adjustment.

Note that as an ELICOS provider, it is a requirement to employ or contract a person with formal qualification in counselling and/or relevant experience and who is able to provide culturally appropriate counselling to students about academic and welfare issues. This can be part of a person's role e.g., the Academic Manager, a specific position or contracted out. Duties are included in the Position Description – Counsellor.

1.2 Develop a position description or access an existing position description. Ensure all information in the position description is accurate and identifies the key responsibilities, key selection criteria and desirable skills and attributes.

- For the academic leadership, the requirements of ELICOS Standard P6.2 must be clearly included.
- For trainers and assessors, the requirements of 3.2 and 3.3 of the Outcome Standards for RTOs and the Credential Policy must be clearly included. In summary this means that trainers and assessor must:
 - hold the training and assessment credential as documented in 1X of the Credential Policy
 - have industry competencies, skills and knowledge that are relevant to, and at least to the level of, the training product being delivered and/or assessed
 - maintain an understanding of current industry practices
 - undertake continuing professional development to maintain current skills and knowledge in training and assessment, including engaging and supporting VET students.
- For ELICOS teachers, the requirements of ELICOS Standard P6.4 must be clearly included.

- 1.3 Develop an advertisement for the position and advertise the position using the preferred recruitment channels. The advertisement will include the purpose of the role, key selection criteria, mandatory qualifications as relevant and a contact name and number.
- 1.4 Develop a short list of suitable candidates.
- 1.5 Interview shortlisted candidates using Staff Interview Form.
- 1.6 Select the most suitable candidate and check referees.
- 1.7 Verify the qualifications of all staff and keep on file. Verification is to occur through contacting the issuer of the qualification and having them verify as per their own procedures that the qualification is authentic. For trainers and assessors, verification can also be through the USI.
- 1.8 Send out a letter of engagement and contract to successful candidate/s and rejection letters to unsuccessful candidates.
- 1.9 Provide the Fit and Proper Person Requirements form for completion to governing persons including executive officers, high managerial agents and any persons who exercise a degree of control or influence over the management or direction of the RTO.
- 1.10 Check the information in the form and action any areas of concern accordingly. This may include but is not limited to:
 - inquiring with the individual about any information of concern in the form
 - following up that information with others if permitted to do so by the individual and privacy laws
 - making file notes on the outcomes of the inquiry.

2. RECRUIT AND SELECT INDUSTRY EXPERTS

- 2.1 Identify the need for an industry expert to work alongside a trainer and assessor. Note this must be based on a specific need for expertise related to the training product or the student cohort and this need must be documented.
- 2.2 Source a suitable industry expert. This may be from existing networks or by using networks such as LinkedIn or asking contacts about suitable contacts.
- 2.3 Interview the industry expert to confirm they have relevant industry competencies, skills and knowledge and specialised industry or subject matter expertise as required for the training product being delivered and assessed.
- 2.4 Agree on the services to be provided by the industry expert which may include but is not limited to:
 - guest speaking during training delivery
 - observing students performing specialist industry tasks

- confirming students' understanding of specialist industry processes as part of an assessment.
- 2.5 Document the agreed services in a contract, including that the industry expert must be working under the direction of a person with the credentials specified in the Credential Policy and, where the expert is involved in the assessment judgement, they work alongside the trainer or assessor to conduct the assessment.
- 2.6 Prepare a file to demonstrate that the industry expert has the relevant vocational competencies and current industry skills directly relevant to the training being provided. The documentation could include but is not limited to:
- resume
 - any relevant licences
 - qualifications and/or statements of attainment
 - references
 - membership of associations
 - descriptions of industry competencies, skills and knowledge and specialised industry or subject matter expertise specific to the training product.
- 2.7 Assign the relevant trainer and assessor to work with the industry expert so that it can be ensured that the industry expert is working under the direction of a person with the credentials specified in 1E of the Credential Policy and, where the expert is involved in the assessment judgement, they work alongside the trainer or assessor to conduct the assessment.

3. INDUCT STAFF

- 3.1 Create a staff file for the new staff member. For trainers and assessors, the Trainer Assessor Evidence File and Professional Development Plan and Log must also be completed and maintained. For ELICOS Teachers a Professional Development Plan and Log must also be completed and maintained.
- 3.2 File all relevant documentation including qualifications and experience.
- Trainer and assessor files must include all documentation as per the requirements of Standards 3.1, 3.2 and 3.3 of the Outcome Standards for RTOs must be clearly included.
 - The Academic Manager file must include all documentation as per the requirements of ELICOS Standard P6.2.
 - ELICOS teacher must include all documentation as per the requirements of P6.4.
- 3.3 Provide an induction for staff using the Induction Checklist. The Induction Checklist includes specific sections that must be used for trainers and assessors and ELICOS teachers. Note that the induction will ensure that all executive officers, high managerial agents and any persons who exercise a degree of control or influence over the management or direction of the RTO will be informed that they will be required to declare where there has been any

specific change to the information in their Fit and Proper Person Requirements information within 5 working days of that change occurring.

3.4 File the Induction Checklist.

4. TRAINERS AND ASSESSORS WORKING TOWARDS A TRAINING AND ASSESSMENT CREDIT OR TRAINING AND ASSESSING UNDER DIRECTION

- 4.1 Ensure the trainer and assessor working towards a training and assessment credit or training and assessing under direction has completed the trainer and assessor evidence file to demonstrate that they:
- hold the relevant training and assessment credential which means:
 - for trainers and assessors working towards a training and assessment credential (1C of the Credential Policy), they must be:
 - enrolled in and have commenced training in either the TAE40122 Certificate IV in Training and Assessment or its successor, or TAE50122 Diploma of Vocational Education and Training or its successor, and
 - making satisfactory progress to enable the credential to be completed within two years of commencement.
 - for trainers and assessors working under direction, they must have the training and assessment credential specified in 1D of the Credential Policy, that is relevant to the learner cohort which the individual is involved in training and assessing.
 - have industry competencies, skills and knowledge that are relevant to, and at least to the level of, the training product being delivered and/or assessed.
 - maintain an understanding of current industry practices.
- 4.2 Allocate a qualified trainer and assessor to provide direction (supervision) for each trainer and assessor that is not yet qualified. The supervising trainer and assessor must be a fully qualified trainer and assessor and hold the credentials specified in 1E of the Credential Policy.
- 4.3 Set up a schedule of pre-delivery meetings where the supervising trainer and assessor will meet with the trainer and assessor actively working towards a training and assessment credential or working under direction. These meetings will focus on reviewing content and the delivery approach, discussing learning activities and addressing any issues.
- 4.4 Schedule full or partial sessions that the trainer and assessor actively working towards a training and assessment credential or working under direction can provide. These will also be observed by the supervising trainer and assessor. The number of sessions will be dependent on the skills, knowledge and experience of the trainer and assessor actively working towards a training and assessment credential or working under direction and their progress with their TAE qualification or skill set.
- 4.5 Set up a schedule of post-delivery meetings where the supervising trainer and assessor will meet with the trainer and assessor actively working towards a training and assessment

credential or working under direction. These meetings will focus on reviewing and reflecting on performance and addressing any issues.

- 4.6 The above details are documented in a Working Under Direction Plan. The plan also allows for the monitoring of the arrangement and then to sign off that the trainer and assessor is fully qualification.

5. ORGANISE AND MONITOR PROFESSIONAL DEVELOPMENT

- 5.1 Identify how access to professional development can best be facilitated. This may include:

- scheduling time during work hours for staff to participate in professional development.
- allowing flexible work arrangements to accommodate professional development.
- offering in house training.
- paying or part paying for external professional development.
- providing access to learning resources
- creating a professional development calendar.
- promoting collaborative learning and mentoring.

- 5.2 Organise professional development to meet London College's needs as outlined below.

VET Trainers and Assessors

- Trainers and Assessors are provided with and must complete a Professional Development Plan and Log.
- The Professional Development Plan and Log is to be updated each time a trainer and assessor completes a professional development activity or schedules in a professional development activity.
- Trainers and assessors must ensure that all three areas of professional development as follows are covered in each 12-month period: VET industry knowledge; training and assessment practices; Industry currency, skills and knowledge practices.
- Trainers are informed of all the above requirements.

ELICOS Teachers

- A program of professional development for ELICOS teachers must be organised annually.
- Use the Professional Development Plan and Log template to include planned ELICOS activities.
- The requirements of P6.8 of the ELICOS Standards must be met.

All other staff:

- All staff are provided with and must complete a Professional Development Plan and Log.
- The Professional Development Plan and Log will identify and document professional development which will enable staff to effectively perform their roles. Staff are required

to participate in professional development at least twice a year and London College will facilitate access for staff to professional development.

- The Professional Development Plan and Log is to be updated each time the staff member completes a professional development activity or schedules in a professional development activity.

5.3 Professional development will be reviewed as part of the trainers' and assessors' and ELICOS teachers' annual performance review.

5.4 File all professional development documentation.

6. CONDUCT PERFORMANCE REVIEWS

6.1 Conduct annual performance reviews which will broadly address the following areas:

- Job performance including quality of work, productivity, problem-solving.
- Skills and competencies, including technical/industry skills, communication skills, adaptability.
- Teamwork and collaboration, including cooperation, reliability and conflict resolution.
- Initiative and innovation, including proactivity, creativity, continuous improvement.
- Work ethics and professionalism, including integrity, professionalism and punctuality.
- Goal achievement, including goal setting, performance against goals and contribution against goals.
- Feedback and development, including receptiveness to feedback, self-assessment and professional development.

6.2 Document results of the performance review.

6.3 Monitor actions arising out of the performance review.

7. CONDUCT STAFF MEETINGS

7.1 Schedule staff meetings to discuss operational matters.

7.2 Schedule specific academic staff meetings to discuss academic issues including:

- course content and developments in English language, as well as VET teaching
- course improvements.

7.3 Monitor actions arising out of the performance review.

RESPONSIBILITIES

The CEO is responsible for all aspects of staff recruitment, induction and professional development outlined in this policy and associated procedures.

Supervising trainers and assessors are responsible for working with trainers and assessors under supervision.

Third Party Policy and Associated Procedures

PURPOSE OF THE POLICY

This policy and associated procedures have been developed to ensure that London College has processes in place for establishing and monitoring partnerships with third parties who provide services on behalf of London College such as marketing, training and assessment and other relevant services.

This policy and associated procedures meet the requirements of Standard 4.2 of the Outcome Standards for RTOs, as well as the third party arrangements in Compliance Requirements.

POLICY STATEMENTS

OVERVIEW

To ensure that third parties who deliver services on behalf of London College meet all requirements, London College establishes and maintains a written agreement with all third parties who provide services on its behalf. Services may include:

- marketing of the training products on London College's scope
- student recruitment
- provision of training and assessment services
- provision of additional services such as student support.

The Third Party Agreement will outline roles and responsibilities of each party in relation to the agreed services.

THIRD PARTY AGREEMENTS

All third parties representing London College must sign and abide by London College's Third Party Agreement.

London College's Third Party Agreement will include:

- particulars including the business or trading names of the parties to the agreement, the dates on which the agreement will commence and end and all the parties' obligations concerning the delivery of the services.
- responsibilities of London College, including that London College is responsible at all times for compliance with the Outcome Standards, Compliance Requirements and Credential Policy.
- London College requirements of the third party in representing it including but not limited to:
 - declaring in writing and taking reasonable steps to avoid conflicts of interests with its duties as a third party of London College
 - observing appropriate levels of confidentiality and transparency in their dealings with students
 - acting honestly and in good faith, and in the best interests of all students
 - having appropriate knowledge and understanding of the VET system in Australia

- prohibiting the third party from:
 - using the NRT logo
 - using London College branding
 - issuing any AQF certification documentation.
- London College processes for monitoring the activities of the third party
- the corrective action that may be taken by London College if the third party does not comply with its obligations under the third-party agreement, including providing for corrective action
- grounds for termination of the third party agreement, including providing for termination in the circumstances
- the circumstances under which information about the third party may be disclosed by the registered provider and the Commonwealth or state or territory agencies
- the requirement for the third party to cooperate with ASQA in the provision of information and the conduct of audits as required.

London College will notify ASQA of all third-party agreements within 30 calendar days of the agreement commencing and within 30 calendar days of it coming to an end.

MONITORING AND CORRECTIVE ACTION

London College will monitor all third parties using the monitoring processes described in the agreement.

London College will take immediate corrective action where London College becomes aware that, or has reason to believe, the third party has complied with their responsibilities as outlined above.

TERMINATION

London College will immediately terminate its relationship with the third party where London College becomes aware, or has reason to believe, that the third party is engaging in practices in contravention of the third-party agreement.

PROCEDURES

1. PROCESS THIRD PARTY APPLICATIONS

- 1.1 Provide a Third Party Application Form to the potential third party.
- 1.2 On receipt of an application, check that the application form has been completed in full and that any supporting information has been provided.
- 1.3 Send an acknowledgement that the application form has been received within 3 working days of the receipt of the application. Request additional information not provided, as relevant.
- 1.4 Review information included in application form.

- 1.5 Call referees for reports on the third party.
- 1.6 Approve the third-party application where the third party has demonstrated experience and skills, provides services that align with London College's marketing objectives and positive reports from referees are received.
- 1.7 For successful third parties, customise the Third Party Agreement and send to the third party for signing. This must be within 10 working days of receiving the application.
- 1.8 Where the third party is not deemed to be suitable, send an email within 10 working days of receiving the application advising that their application has not been successful and including the reasons why.

2. MANAGE THIRD PARTIES

- 2.1 Following the signing of the agreement, advise ASQA via ASQAnet and within 30 days of the agreement.
- 2.2 File all signed third party agreements.
- 2.3 Contact the third party to provide an induction, including an overview of London College, requirements and policies and associated procedures relevant to the services to be provided.
- 2.4 Provide the third party with documentation as relevant to the services being provided.

3. MONITOR THIRD PARTIES

- 3.1 Regularly update third party with updated documentation.
- 3.2 Monitor third parties every six months using the Third Party Monitoring Form.
- 3.3 Where the Third Party Monitoring Form or feedback from students indicates that the third party may not be meeting the terms of their agreement, immediately investigate the issue.
- 3.4 Where the investigation confirms that the provider has not complied with their responsibilities as per the Third Party Agreement (except in the case of where the third party has engaged in unacceptable practices - see the following section), contact the third party in writing to advise to corrective actions that are required.
- 3.5 Implement relevant corrective actions.
- 3.6 Monitor corrective actions as required to ensure they are implemented.
- 3.7 File all documentation associated with monitoring.

4. TERMINATE THIRD PARTY AGREEMENTS

- 4.1 Where third party monitoring or any other intelligence demonstrates that the third party has engaged in practices that are not acceptable under the agreement, immediately send a

notice in writing to the third party advising them that their contract is terminated and giving the reasons why.

- 4.2 Remove any references to the third party on marketing materials and other relevant documentation.
- 4.3 Advise ASQA via ASQAnet of termination of the agreement and within 30 days of the agreement ending.

RESPONSIBILITIES

The Marketing Manager is responsible for:

- assessing and approving third party applications
- managing third party applications
- monitoring and terminating third party agreements.

QUALITY ASSURANCE POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensuring that all aspects of its operations are quality assured.

This policy and associated procedures meet the requirements of Standard 4.4 of the Standards for RTOs, as well as standard P3.3, P4.3 and P5 of the ELICOS Standards 2018.

POLICY STATEMENTS

QUALITY APPROACH

London College's is committed to continuous improvement to support the quality of services provided.

Quality forms part of London College's overall commitment and all services provided are delivered to the highest possible standards.

London College has a range of mechanisms in place for collecting and analysing data and feedback from students, staff, industry, employers and regulators.

London College monitors and evaluates its performance against the Standards and uses the outcomes to inform continuous improvement.

PROCEDURES

1. COLLECT, ANALYSE AND ACT UPON DATA AND FEEDBACK FROM STUDENTS

- 1.1 Use surveys and feedback mechanisms to collect data and feedback from students. This will include:
 - providing an Orientation Survey to students at their orientation to assess their pre-enrolment and orientation experience.
 - providing the Learner Questionnaire (quality indicator form) to students before they complete their course.
 - informing students in the Handbook and at orientation as to how they can provide feedback through completing the Feedback Form.
- 1.2 Identify the need for additional surveys of students and develop and implement as required.
- 1.3 Analyse and document the findings of all data and feedback collected. Analysis may include:
 - Identifying key trends or patterns in responses.
 - Using descriptive statistics such as percentages and averages to highlight findings.
 - Comparing results across different cohorts.
 - Identifying unexpected results or anomalies and their implications.

- 1.4 Where the analysis indicates that improvements are required, include these findings on the Continuous Improvement Register and identify required actions and associated responsibilities and timelines.
- 1.5 Communicate findings and required actions, responsibilities and timelines to relevant stakeholders.
- 1.6 Monitor completion of actions and document outcomes on the Continuous Improvement Register.
- 1.7 Complete quality indicator annual summary report for calendar year and submit to ASQA by 30 June each year.

2. COLLECT, ANALYSE AND ACT UPON DATA AND FEEDBACK FROM STAFF

- 2.1 Ensure that staff can provide feedback at all staff meetings by including an agenda item for such. Meetings may be whole of staff meetings or teams such as academic teams.
- 2.2 Ensure that all staff are aware that they can provide feedback outside of meetings by completing a feedback form.
- 2.3 Identify the need for additional ways to seek data and feedback from staff and develop and implement as required.
- 2.4 Analyse the findings of all data and feedback collected. Analysis may include:
 - Identifying key trends or patterns in responses.
 - Using descriptive statistics such as percentages and averages to highlight findings.
 - Identifying unexpected results or anomalies and their implications.
- 2.5 Where the analysis indicates that improvements are required, include these findings on the Continuous Improvement Register and identify required actions and associated responsibilities and timelines.
- 2.6 Communicate findings and required actions, responsibilities and timelines to relevant stakeholders.
- 2.7 Monitor completion of actions and document outcomes on the Continuous Improvement Register.

3. COLLECT, ANALYSE AND ACT UPON DATA AND FEEDBACK FROM OTHER STAKEHOLDERS

- 3.1 Identify relevant stakeholders to collect data and feedback from. This may include employers, industry stakeholders and regulators as relevant.
- 3.2 Use surveys and feedback mechanism to collect data and feedback from stakeholders. This will include:

- providing the Employer Questionnaire (quality indicator form) to employers prior to students they employ completing their course
 - completing industry consultation as outlined in the Training and Assessment Policy and Associated Procedures.
- 3.3 Identify the need for additional ways to seek data and feedback from other stakeholders and develop and implement as required.
- 3.4 Analyse and document the findings of all data and feedback collected. Analysis may include:
- Identifying key trends or patterns in responses.
 - Using descriptive statistics such as percentages and averages to highlight findings.
 - Comparing results across different cohorts.
 - Identifying unexpected results or anomalies and their implications.
- 3.5 Where the analysis indicates that improvements are required, include these findings on the Continuous Improvement Register and identify required actions and associated responsibilities and timelines.
- 3.6 Communicate findings and required actions, responsibilities and timelines to relevant stakeholders.
- 3.7 Monitor completion of actions and document outcomes on the Continuous Improvement Register.
- 3.8 Where the analysis indicates that improvements are required, include these findings on the Continuous Improvement Register and identify required actions and associated responsibilities and timelines.
- 3.9 Complete quality indicator annual summary report for calendar year and submit to ASQA by 30 June each year.

4. COMPLETE ONGOING REVIEW OF QUALITY AND COMPLIANCE

- 4.1 Develop a quality and compliance schedule to ensure that each aspect of London College's operations is audited and reviewed.
- 4.2 Organise an external consultant at least annually to complete an internal audit.
- 4.3 Where the outcome of the compliance review indicates that improvements are required, include these findings on the Continuous Improvement Register and identify required actions and associated responsibilities and timelines.
- 4.4 Communicate findings and required actions, responsibilities and timelines to relevant stakeholders.
- 4.5 Monitor completion of actions and document outcomes on the Continuous Improvement Register.

RESPONSIBILITIES

The CEO and Academic Manager are collectively responsible for all aspects of quality assurance as outlined in this policy and associated procedures.

HEALTH AND SAFETY POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to managing health and safety of all staff, students, contractors and visitors.

This policy and associated procedures meet the requirements of Standard 4.3 of the Outcome Standards for RTOs and compliance with other requirements in the Compliance Requirements, as well as Standard 6.9 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 and Standard P7.2 of the ELICOS Standards.

POLICY STATEMENTS

COMPLIANCE WITH LEGISLATION

London College meets the requirements of the WHS legislation for the State/Territory in which it is based and complies with all other relevant legislation, regulations, codes of practice, advisory and best practice standards.

ORGANISATION RESPONSIBILITY AND COMMITMENT

London College is committed to:

- providing a safe and healthy environment for all staff, students, contractors and visitors and others during their participation in activities with London College
- implementing effective risk management systems that are relevant and suitable for the organisation's scope of business
- promoting workplace health and safety at all times
- continuously improving performance in relation to health and safety
- encouraging active participation, cooperation and consultation with all staff and others in the promotion and development of measures to improve health and safety
- actively responding to, recording and investigating all incidents
- maintaining relevant policies, procedures, training, codes of conduct and systems to support and communicate effective health and safety practices throughout the organisation
- routinely conducting checks of the work environment to assess risks, identify hazards and identify areas for improvement
- taking immediate response to reduce the risk of identified workplace hazards
- providing appropriate induction, training, information and updates to staff, students and others on a regular basis about workplace health and safety.

STAFF RESPONSIBILITY

All staff including managers have a responsibility to work safely, take all reasonable care for their own health and safety and always consider the health and safety of others who may be affected by their actions.

When staff are undertaking work from home or at an off-site location, the staff member is responsible for ensuring the environment they enter into is free from risk and occupational health and safety hazards.

HEALTH AND SAFETY CONSULTATION AND COMMUNICATION

Health and safety consultation and communication will be carried out as follows:

- Team meetings (where work health and safety is always an agenda item).
- One off meetings to discuss health and safety issues arising.
- Briefing sessions on new health and safety requirements/information.

Records of all meetings will be kept and action plans to address issues will be drawn up as required.

Follow up of actions to be taken will occur through regular team meetings.

REPORTING

All staff, and others are required to report any identified workplace hazards and associated risks as soon as they become aware of them.

All staff, and others are required to report any incident that causes harm to a person during their participation in work and/or training activities with London College.

RECORD KEEPING

Appropriate records of the organisation's risk management strategy, workplace hazards and workplace injuries will be accurately maintained at all times.

PROCEDURES

1. MANAGE WORK HEALTH AND SAFETY MANAGEMENT SYSTEM

- 1.1 Identify and action WHS issues on an ongoing basis.
- 1.2 Consult with staff on WHS issues.
- 1.3 Action WHS issues as required.
- 1.4 Provide training to staff on WHS issues as required.
- 1.5 Ensure all visitors to London College sign in and out on the Visitor Register.
- 1.6 Keep all health and safety records.

2. CONDUCT WORKPLACE INSPECTIONS

- 2.1 Inspect the workplace for hazards and risks.
- 2.2 Control hazards and risks using selected control methods or report hazards and risks.

3. RESPOND TO INCIDENTS

- 3.1 Report any incidents using the Workplace Incident Form.
- 3.2 Submit Workplace Incident Form to relevant Manager.
- 3.3 In the case of an injury, the first person in attendance must contact the First Aid Officer or emergency services in the case of a serious injury.

RESPONSIBILITIES

The CEO is responsible for overall health and safety management.

The Administration Manager is responsible for ensuring health and safety at all times and consulting staff on WHS.

All staff are responsible for identifying and reporting health and safety issues and incidents and applying safe work practices at all times.

CRITICAL INCIDENT POLICY AND ASSOCIATED PROCEDURES

RESPONSIBILITIES

This policy and associated procedures outline London College's approach to managing critical incidents.

This policy and associated procedures meet the requirements of Standard 4.3 of the Outcome Standards for RTOs and compliance with other requirements in the Compliance Requirements, as well as Standard 6 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

POLICY STATEMENTS

APPROACH TO CRITICAL INCIDENTS

London College is committed to the health and safety of staff and students. This includes having measures in place to ensure the safety of staff, students and visitors in the event of a critical incident.

At the time of the critical incident, a critical incident team will be established to manage the critical incident. The make-up of the team will depend on staff availability at the time of the incident.

Staff will be trained in the management of critical incidents and students will also receive information about critical incidents management. This will include how to seek assistance for and report a critical incident.

All staff will receive induction into their role which will include information about health and safety, as well as critical incidents. Training and updates to information will be provided to staff on a regular basis.

Post-incident support will be provided to all persons involved in the critical incident.

London College response to critical incidents will be evaluated following each critical incident. Any improvements identified will be implemented as required.

All records of critical incidents will be filed.

PROCEDURES

1. RESPOND TO A CRITICAL INCIDENT

- 1.1 Immediately call the emergency services on 000 in the event of death or an immediate threat to the life of a person or to property.
- 1.2 Action evacuation procedures if required.
- 1.3 Immediately report incident to a member of London College's management team.
- 1.4 Establish a Critical Incident Team who will meet immediately following the incident to assess the facts of the situation, who has been affected and discuss the priorities and actions to be taken. Roles and responsibilities will be allocated.

1.5 Assess required actions which may include but are not limited to:

- alerting emergency contacts
- nominating a member of the Critical Incident Team to be a main point of contact
- liaising with external agencies, including emergency services
- issuing a media release advising of the situation
- informing all staff and students of the critical incident situation
- regularly updating all staff and students of the critical incident situation
- organising emergency counselling for those affected
- providing details of support services that can be provided
- seeking legal advice
- assisting students with insurance claims.

1.6 Document all actions in a critical incident action plan.

1.7 Implement the critical incident action plan.

1.8 Adjust the critical incident action plan as required.

2. EVALUATE CRITICAL INCIDENTS

2.1 The Critical Incident Team formed for the specific critical incident will meet as soon as possible after the critical incident to complete all of the following actions.

2.2 Review the actions taken and perceived effectiveness of the response.

2.3 Identify any recommendations for improvement.

2.4 Action recommendations for improvement.

RESPONSIBILITIES

The CEO is responsible for coordinating the critical incident response.

The Academic Manager is responsible for assisting with the critical incident response.

All staff are responsible for calling emergency services as required in the event of a critical incident and notifying the management team.

PRIVACY POLICY AND ASSOCIATED PROCEDURES

PURPOSE OF THE POLICY

This policy and associated procedures outline London College's approach to ensuring the privacy and confidentiality of all of its staff, students and relevant others.

This policy and associated procedures meet the requirements of information management of Standard 4.3 of the Outcome Standards for RTOs and Compliance Requirements (Section 1) regarding information management, as well as Standard 3 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, as well as the National VET Regulator (Data Provision Requirements) Instrument 2020 and National VET Data Policy.

POLICY STATEMENTS

PRIVACY LEGISLATION AND PRINCIPLES

London College has adopted the Australian Privacy Principles contained in the Privacy Act 1988.

COLLECTION OF PERSONAL INFORMATION

London College collects personal information only for the purposes of its business operations.

London College also collects personal information about students undertaking nationally recognised training and discloses this information to the National Centre for Vocational Education Research Ltd (NCVER).

London College provides information to staff and students about why their information is being collected and how it will be used, as well as their ability to access information held about them.

Both staff and students have the right to request that their personal information be changed.

A Privacy Notice is included in the Application for Enrolment Form and Offer Letter and Student Agreement.

Staff contracts refer to privacy rights and obligations.

All personal information is kept secure and confidential at all times.

All persons have the right to make a complaint or appeal in relation to privacy matters as per London College's Complaints and Appeals Policy and Procedures.

SENSITIVE INFORMATION

London College also collects sensitive information. Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will only be used by London College:

- for the primary purpose for which it was obtained
- for a secondary purpose that is directly related to the primary purpose

- with an individual's consent, or where required or authorised by law.

PROCEDURES

1. MANAGE PERSONAL INFORMATION

- 1.1 Process all personal information according to the relevant procedures.
- 1.2 Archive personal information according to the relevant procedures.

2. PROVIDE ACCESS TO RECORDS

- 2.1 Review written requests for access to records.
- 2.2 Arrange for the individual to view their personal information as requested.
- 2.3 Update personal information according to any requests made.
- 2.4 Keep all documentation relating to access to records.

RESPONSIBILITIES

The Academic Manager is responsible for ensuring privacy at all times and consulting staff on WHS.

The Administration and Student Support Officer is responsible for processing all personal information and providing access to records as required.

APPROVALS AND DOCUMENT CONTROL

This set of policies and procedures has been purchased under a licence agreement with RTO Works and has been reviewed and customised to suit London College's specific requirements.

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APPROVED BY:	CEO
APPROVAL SIGNATURE:	<i>Jack Zhou</i>
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