

Evidence of Participation Procedure



PURPOSE

To ensure that MADEC (MADEC Australia) records, collects and maintains sufficient evidence to demonstrate a student's participation in each unit of competency/module undertaken as part of their studies. Failure to comply with these requirements may result in a breach of the Service Agreement/Contract and may require funds to be returned to the government funding body.

SCOPE

All staff involved in the management, delivery, assessment and recording of training are responsible for compliance with this policy.

OBJECTIVES

All training delivery must be supported by evidence of participation for each unit of competency/module in accordance with the following specifications.

Evidence must be authenticated by documentation that demonstrates engagement by the student in the learning and/or assessment activity. To be valid evidence provided must contain the student's name or student identification number, a unit of competency or module code and the date at which the evidence was obtained.

In addition, the following minimum specifications must be met to evidence an Eligible Individual's engagement in Training Services activity:

- A. One (1) point of Evidence of Participation per unit of competency/module must be provided if the period between the Enrolment Activity Start Date and Enrolment Activity End Date (inclusive) for the unit of competency/module is one month or less;
- B. Two (2) points of Evidence of Participation per unit of competency/module must be provided if the period between the Enrolment Activity Start Date and Enrolment Activity End Date for the unit of competency/module is greater than one month, including one point within the last month of training delivery and/or assessment as identified by the reported Enrolment Activity End Date. Two different forms of Evidence of participation must be used. An auditor would consider the time elapsed between the start and end date (or withdrawal) of the unit of competency/module and use discretion as to a reasonable demonstration of ongoing engagement by an individual in learning and/or assessment activity across the unit of competency/module.

The only Evidence of Participation that will be accepted for this purpose is as follows:

- A. **Evidence of work submitted relating to engagement by the student in the unit of competency or module:** At a minimum, this evidence must contain the student's signature, in addition to the student's name, unit of competency/module and date required for all Evidence of Participation. In cases where this information cannot be recorded on the work itself, separate evidence must accompany the work to allow it to be linked to the student, the unit of competency/module and date completed, for example identification of a student trademark and a delivery schedule or equivalent detailing how the piece of work covers the module or unit of competency in question, including due dates and milestones.
- B. **Instructor (trainer and/or assessor) notes based on personal interviews, telephone, e-mail, or other communication modes on the engagement of a student in learning and/or assessment activity of the unit of competency or module.**

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- C. **A Class Attendance Roll:** In order to be considered acceptable, the roll must be 'Endorsed' in this instance means a signature of the trainer or relevant administration person of the RTO on the attendance roll, the printed name and date (including a key to any symbols used if appropriate). This will be sufficient provided it can be shown that the actual unit of competency or module was delivered at the point at which the Eligible Individual is marked on the roll (i.e. endorsed each time the Eligible Individual is marked on the roll). Where the roll indicates that the individual has only attended the first class supporting documentation must be supplied demonstrating that there was engagement in the learning and/or assessment activities of the module/unit of competency during that class. Attendance at an induction or orientation class alone is not sufficient Evidence of participation.

For clustered delivery:

- i) Where, for the purposes of delivery or assessment, units of competency or modules are clustered together the evidence provided must satisfy participation at the unit of competency and module level requested;
- ii) where the modules are delivered consecutively, a notation on a roll or student management sheet that indicates which training was actually delivered in a session at the unit of competency or module level will be sufficient; and
- iii) For other types of clustered delivery, a delivery schedule or equivalent must be provided that shows the planned training, at the unit of competency or module level; on the date/s the individual was in attendance.

For electronic rolls support documentation is required to indicate the processes involved in annotating, entering, updating and generating the rolls, as well as how to interpret the rolls;

- D. **Primary documentation that provides evidence of assessment:** Primary documentation is considered to be either a secure paper based or electronic record that indicates an actual result consistent with assessment. All results should be supported by trainer/assessor endorsed documentation such as the Training Plan, trainer's record book, diary, the actual assessment or similar record which confirms delivery to the individual student. Evidence of student results should have an endorsement at the delivery level that confirms the accuracy of the student information such as the signature of the trainer, printed name and position. For all RPL outcomes, only the primary assessment tool used for any skills recognition assessments will be accepted.
- E. **Where primary recording documentation is not available a signed statutory declaration from the relevant RTO staff affirming an individual's participation:** In the event that extreme circumstances prevent the provision of any of the primary recording documentation as detailed above (e.g. fire, flood or other equivalent circumstances), staff directly associated with the training delivery that are authorised by the RTO may be prepared to attest participation of the individual in the unit of competency or module enrolment in question. In all such cases the staff member is required to submit and sign a statutory declaration affirming their evidence.

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In order to constitute sufficient evidence of Participant, an appropriate Trainer must provide:

- i. A full explanation of the reasons why primary recording documentation is not available; and a signed and dated statutory declaration containing a full explanation of the evidence being provided and affirmed that is sufficient to substantiate the claim that the individual participated. It should be noted that a signed document merely stating that participation within the enrolment has occurred would not meet verification requirements.
- F. Login and engagement with learning and/or assessment activity required for the unit of competency or module:** Where an individual has a secure login to specific learning and/or assessment activity (for the unit of competency or module) in which they are enrolled, the login record demonstrating on-line engagement with the learning and/or assessment activity will constitute evidence of engagement. The login record must evidence the Eligible Individual undertaking learning and/or assessment activity. A login record indicating the Eligible Individual received training materials alone is not sufficient Evidence of Participation. Records must also indicate that the RTO has checked with the student that they are continuing to engage across the unit of competency/module.
- G. In flexible and distance modes of learning, records of staff/student engagement with learning and/or assessment activity at a unit of competency or module level that indicates the individual has commenced working on the learning materials received.** Records must also indicate that the RTO has checked with the student that they are continuing to engage across the unit of competency/module.
- Or
- H. Where primary recording documentation is not available, a statement from the relevant individual affirming their participation:** In the event that extreme circumstances prevent the provision of any primary recording documentation as set out in paragraph (e), a statement from an Eligible Individual declaring they participated in the module/unit of competency may be provided. An appropriate RTO trainer must also provide a full explanation of the reasons why primary recording documentation is not available.

General Requirements associated with verification of participation

Evidence of Participation for each Eligible Individual being provided with Training Services by the RTO and in respect of which Funds are payable by the Department must be collected and retained by the RTO for audit or review purposes.

In undertaking an audit or review of Evidence of Participation in respect of Eligible Individuals, an auditor will attempt to utilise appropriate recording models adopted by the RTO to assure Evidence of Participation relating to the unit of competency or module.

Statements from Eligible Individuals declaring they participated in the module/unit of competency will only be accepted if evidence of extreme and exceptional circumstances such as fire, flood or theft, outlined in previously is provided.

Attendance in 'orientation' or similar type activity is not regarded as participation.

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A training plan endorsed by a Trainer/Assessor and/or student is not regarded as participation.

The Training Administration Manager is responsible for conducting staff training in relation to this policy.

The Quality Manager will monitor that relevant staff record, collect and maintain sufficient evidence by conducting internal audits to ensure compliance with this procedure.

References:

NCVER - Non-financial audit guidelines March 2017
2017 VET Funding Contract – Skills First Program

Custodian:

National Training Manager