



# ETEA RECORDS MANAGEMENT POLICY AND PROCEDURE

## 1.0 Purpose

- 1.1 The purpose of this policy and procedure is to define the system used to:
- Assure the integrity, accuracy and currency of records
  - Maintain up to date records of the verified qualifications and experience of trainers and assessors
  - Maintain up to date records of enrolments and participation
  - Maintain up to date records of fees paid and refunds given
  - Maintain registers of documents that relate to the Scope of Registration
  - Manage recordkeeping requirements for overseas students as required by ESOS legislation, ESOS regulations and the National Code of Practice
  - Records are routinely backed up and effectively protected
  - Records are archived so that they are accessible and protected
  - The RTO meets requirements for retention, archiving and retrieval of information, in order to satisfy licensing authorities' requirements
  - Maintain up to date records of the international students in accordance with the Section 21 of the ESOS act

## 2.0 Scope

- 2.1 This Policy applies to all staff, students and associates of ETEA who create, process or store data and information.

## 3.0 Responsibility

- 3.1 The Student Administration Officer, International Student support Officer (SSO) and Quality Management Committee (QMC) are responsible for the implementation of this procedure and to ensure that staff and students are aware of its application and that staff implement its requirements.

## 4.0 Requirements

- 4.1 Student records must be retained and archived for 30 years in a form that is suitable for retrieval and transfer to third parties and in accordance with the requirements of the Victorian registering authority.
- 4.2 The provision of education and training services to overseas students in Australia is regulated by DEEWR through the Education Services for Overseas Students Act and associated legislation. The purpose of the legislation is to protect the interests of people coming to Australia on student visas, by providing tuition and financial assurance and by ensuring a nationally consistent approach to provider registration. The legislation also seeks to ensure the integrity of the industry through visa-related reporting requirements.
- 4.3 Specific requirements are to be found in the following documents, the Legislation, the Regulations, the National Code the PRISMS User Manual and advice distributed by DIAC from time to time
- 4.4 Confidential information obtained by ETEA and committees individuals or organisations acting on behalf of ETEA must be safeguarded except as required under the Standards for Registered Training Organisations or by law. Information about students and staff are disclosed to third parties with written consent of the student or staff member.
- 4.5 Students and staff members are entitled to access their personal records.
- 4.6 Evidence of verification of the qualifications and experience of assessors and trainers must be maintained.
- 4.7 Document registers and the material listed in the document registers must be readily accessible to any person required to perform any function for ETEA.

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4.8 TRANSFER OF STUDENT RESULTS AND OTHER RECORDS IN THE EVENT OF THAT ETEA CEASING TO OPERATE

If ETEA ceases to operate, it must, within 14 days of ceasing, forward all student results, including student records (name, address and any identifier, such as date of birth) to ASQA. The documentation is to be a complete, accurate and ordered copy of all student results/details since initial registration. The records must be in the form of an electronic copy or hard copy, and include software details if appropriate. Details of qualification/statements of attainment issued to students, and a list of the competencies/modules achieved for each student, must be included.

- 4.9 Storage requirements: All records must be kept securely and confidential information must be safe guarded. Records must be kept safe from fire, flood, termites or any other pests and must be available for perusal by departmental auditors at a scheduled audit.
- 4.10 A backup of all the records must be kept and the method or mechanism by which the material can be retrieved must be retained.
- 4.11 There must be a process in place for archiving and Version Control
- 4.12 ETEA has continuous improvement procedures for Records management
- 4.13 All students and clients have the right to access the records ETEA holds about them. Records will be provided in a timely manner upon written request. Information about how to access the records will be provided on the website for all students to access.
- 4.14 A procedure to confirm in writing and update student contact details (address, and mobile and email if any) at least every 6 months.

**5.0 Definitions**

Archive	Move data to another medium (the backup media) for long-term storage. Archive is intended for the storage of data that does not need to be kept immediately accessible, but which may possibly be needed at some point in the future. At ETEA all the documents are archived electronically. The Quality Management Committee is responsible to archive the policies, procedures and forms. The administrations staff will scan all the hard copies as informed by the responsible staff and archive the documents in respective electronic folders once the student completes the course.
Backup	Copy data to another medium so that, if the active data is lost, the data can be recovered in a recent if not completely current version. Backup is primarily intended for disaster recovery The minimum backup schedule is: every day Full back up to be retained for a period of 7 days

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6.0 Procedure

Retention of documents

Responsibility	Item	Description	Retention	How
Student Administrative Officer and IT	<b>Student Records</b>	<ul style="list-style-type: none"> <li>Student personal details with records of attainment of units of competency and qualifications</li> </ul>	30 years	Student Administrative Officer to maintain Electronically on VETtrak
Course coordinator /Student Administrative officer	<b>Student Records of completed assessments</b>	<ul style="list-style-type: none"> <li>Completed student assessment including enrolment details, RPL and credit transfer documents for each student (refer to the student file checklist for the documents that need to be stored)</li> </ul>	6 months post completion of studies ( 7 years for students under funding)	<p>Course coordinator to provide the documents for each student to the Administrative Officer to file it in the individual student file according to the 'Submitting work to the administration'</p> <p>The 3 samples will be maintained in the validation and moderation folder either scanned on the J drive</p> <p>The Student Administration officer to scan the documents on the J drive</p>
Student Administrative officer/Student Support Officer	<b>CRICOS student records excluding completed assessments)</b>	<p>Student record details must include the following:</p> <ul style="list-style-type: none"> <li>Family name and first name</li> <li>Residential postcode</li> <li>Date of birth</li> <li>Enrolment/commencement date</li> <li>Code and title of course</li> </ul>	2 years post completion	All student records will be scanned post completion on the J drive

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Responsibility	Item	Description	Retention	How
		<ul style="list-style-type: none"> <li>• Code and title of units of competency</li> <li>• Units of competency assessment results</li> <li>• Credentials and date issued</li> <li>• Copies of written agreements to which the provider and student are parties</li> <li>• Amounts of course money that the student has paid to the Provider, including:                             <ul style="list-style-type: none"> <li>○ <i>Whether the amount was paid for the full course or part of the course; and</i></li> <li>○ <i>If the amount was paid for the full course, the duration of the course; and</i></li> <li>○ <i>If the amount was paid for part of the course, the duration of that part of the course;</i></li> </ul> </li> <li>• <i>Any amounts that:</i> <ul style="list-style-type: none"> <li>○ <i>Have become payable, directly or indirectly, to the provider by the student for the student to undertake a course; and</i></li> <li>○ <i>Have not been paid.</i></li> </ul> </li> </ul>		
Course coordinator and Student Administrative officer for student documents  Quality	<b>Training and Assessment documents</b> <b>Master documents</b>	<ul style="list-style-type: none"> <li>• All master documents used for the delivery of the course                             <ul style="list-style-type: none"> <li>○ Training &amp; Assessment strategies</li> <li>○ Copy of all assessments tasks including test, assignments, role-plays, projects and any other type of assessment task used to assess the students</li> <li>○ Assessment schedule</li> <li>○ Log books and workbooks</li> </ul> </li> </ul>	1 year post completion  And student documents under funding for 7 years	All archived documents related to the students will be stored on the J drive  All curriculum drive documents will be stored on the M drive  Course coordinator to provide the feedback to QMC with

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Responsibility	Item	Description	Retention	How
Management Committee for curriculum documents				analysis, which is then stored on the M drive  Course coordinator to provide names of 3 students for validation and Student Administration Officer to maintain the folder on J drive as advised
Course coordinator /Student Administrative officer	<b>Sample of student work for validation</b>	<ul style="list-style-type: none"> <li>3 samples of student assessment including practical placement training and assessment evidences where applicable (Good/Average and NYC)</li> </ul>	5 years in accordance with the validation and moderation policy and procedure	All archived documents related to the students will be stored on the J drive Feedback analysis on the M drive
		<ul style="list-style-type: none"> <li>Analysis of feedback based on the continuous improvement policy</li> </ul>		
Course coordinator, SSO and Student administration officer	<b>Course progress of the student</b>  Course progress register	<ul style="list-style-type: none"> <li>Early ISM documents if applicable</li> <li>ISM documents if applicable</li> <li>Intention to report letter if applicable</li> <li>Appeals documents if applicable</li> <li>Reported in PRISMS if applicable (refer to the Course progress policy, procedures and forms)</li> </ul>	2 years post enrolment  Register is a live document maintained by the SSO	Post completion documents will be scanned on the J drive
Course coordinator and QMC	<b>Complaints and Appeals</b>  Complaints and appeals register	<ul style="list-style-type: none"> <li>Complaints form</li> <li>Appeals form</li> <li>Assessment appeals</li> <li>Improvements or resolution as a result of the complaints or appeal if applicable</li> </ul>	Any complaints leading to continuous improvement will be documented on the QMC task list  A complaints and appeals register will be maintained which would log the resolutions  All complaints will be destroyed after 2	The complaints and appeals register and folder will be maintained as a hard copy and will be destroyed after 2 years

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Responsibility	Item	Description	Retention	How
			years	
SSO and Student administration officer	<b>Deferral suspension or withdrawal</b> Deferral, suspension.... Register (and individual student file)	<ul style="list-style-type: none"> <li>Deferral/suspension/withdrawal/cancellation form</li> <li>Letters that are sent out to the student for refusal or grant of the student request</li> </ul>	2 years post enrolment  Register is a live document maintained by the SSO	Post completion documents will be scanned on the J drive
SSO and Student administration officer	<b>Transfer between registered providers</b>  Transfer between registered providers register (and individual student file)	<ul style="list-style-type: none"> <li>Request for release application form</li> <li>Letter of release</li> <li>Request for release letter denied (letter)</li> </ul>	2 years post enrolment  Register is a live document maintained by the SSO	Post completion documents will be scanned on the J drive
Marketing Manager and IT personnel	<b>Pre- engagement material</b>  Marketing register	<ul style="list-style-type: none"> <li>Website information</li> <li>Brochures</li> </ul>	For 1 year after the document has been archived	Marketing Manager to inform the IT when the document needs to be archived and the date it needs to be destroyed
PA to the CEO and QMC	<b>Agents</b>  Agents register	<ul style="list-style-type: none"> <li>Agent application form</li> <li>Agent agreement</li> <li>Agent feedback form</li> <li>Agent appraisal form</li> </ul>	Period of the contract	The forms filled out will be maintained as hard copy in the Agents folder with the PA to the CEO
SSO, Course coordinator	<b>Student support and orientation</b>	<ul style="list-style-type: none"> <li>Student orientation checklist</li> <li>Change of address details form</li> </ul>	Length of enrolment + 6 months	Post completion documents will be scanned on the J drive

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Responsibility	Item	Description	Retention	How
and Quality Management Committee		<ul style="list-style-type: none"> <li>• Student orientation feedback form</li> <li>• Emergency contact form</li> <li>• Orientation power point</li> <li>• Documents related to support provided by ETEA to the students (special needs)</li> </ul>	International students 2 years post enrolment  Register is a live document maintained by the SSO	
Relevant Course coordinator	<b>Staff records management system</b>	<ul style="list-style-type: none"> <li>• Trainer skills matrix – signed by trainer/assessor</li> <li>• assessor qualifications – verified by RTO or otherwise certified</li> <li>• vocational qualifications – verified by RTO or otherwise certified</li> <li>• CV - signed by trainer/assessor</li> <li>• professional development activities – verified and/or signed by trainer/assessor</li> <li>• position description</li> <li>• Employment contract/agreement.</li> <li>• Supervision record form</li> </ul>	1 year post duration of employment	Relevant Course coordinator to manage the staff records in the storage cabinet
Quality Management Committee	<b>Version control register</b>	Includes all the documents, forms, policies and procedures etc.	It is a live document and changes when a policy, procedure or a form is added or changed	Quality Management Committee to maintain the most current document on the M and P drive
Quality Management Committee and IT	<b>Continuous improvement Records</b>	<ul style="list-style-type: none"> <li>• Feedback forms                             <ul style="list-style-type: none"> <li>○ Learner ( Pre enrolment, unit feedback and end of course feedback and workplace facility)</li> <li>○ employer,</li> <li>○ trainer, (unit feedback and end of course feedback and workplace facility, trainer induction and PD support)</li> <li>○ Workplace training host</li> <li>○ agent,</li> <li>○ Industry</li> </ul> </li> </ul>	Once analysis of feedback is completed the feedback forms will be destroyed	Quality Management Committee and Course coordinator to store the analysis and maintain for 5 years. Course coordinator submits the feedback forms and analysis to QMC and these are then maintained for 5 years on M drive  All the documents will be

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Responsibility	Item	Description	Retention	How
		<ul style="list-style-type: none"> <li>○ Staff (induction and PD support, effectiveness of policy and procedure)</li> <li>● Minutes of the meeting</li> <li>● Validation and moderation documents (including Industry consultation)</li> <li>● Outcomes of internal audits</li> <li>● Professional Development and performance review</li> <li>● Periodical Calendar maintenance</li> <li>● Risk management policy</li> <li>● Records Management continuous improvement documents ( minutes of the meeting, student and staff feedback, )</li> </ul>		maintained by the QMC on the M drive
SSO, Student Administrative officer, Administration Manager	<b>Financial Records</b>	The SSO to maintain documents related to refunds application form and student requests on student file	On student files for 6 months post enrolment 2 years post completion for international students	Scanned with the student files on the J drive
		Tax invoices and tax receipts are maintained on VETtrak	5 years	Maintained on VETtrak
		All other financial documents are maintained on MYOB by the Administration Manager		Maintained on MYOB
Quality Management Committee	<b>Policy, procedures and forms</b>	All documents as per the version control register to be maintained on the M drive	1year post archive	All documents are archived on the M drive under the Quality Committee folder

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7.1 Version control:

- Refer to the Scope of Policies and Procedures
- The Quality Management Committee (QMC) is responsible for implementing and reviewing Policies and Procedures. If a need for change is identified the QMC will implement these changes and articulate this to staff. It is the same process for Forms and Documents although some forms and documents may not have a version control box with all information, they may simply just have the version control number, although they will still be reviewed at least every 24 months.
- The process for review is initiated by the QMC and includes analysing:
  - Whether the Policy and/or Procedures are still consistent with best practice.
  - organisation, and changes to the National VET Regulator Standards, National Code or Government Policy and Legislation
  - whether the Policy meets both employers and employees needs
  - the level of compliance with the existing Policy and/or Procedures
  - Policies and Procedures of HCG and the additional businesses are reviewed every 24 months. Procedures are likely to be reviewed more frequently as the process of “doing things” are more common to change.

7.2 Archiving of documents:

- An electronic archived folder is created on the server.
- The archived folder will consist of folders according to the name of the document
- An archived register will be maintained for student files
- Once the documents are archived it becomes the responsibility of the Student Administrative Officer and Quality Management Committee to monitor the archived folder.

7.3 Retrieval of documents:

- The documents once archived can be accessed by the Student Administration Officer (student files) and QMC (in relation to the Curriculum drive documents and policy, procedures and forms). If any documents are required for auditing purposes or by any staff the access needs to be approved by the Quality Management Committee for documents other than student files.
- The archived documents will be provided in hard copy only; unless requested by the CEO.

7.4 Student Recruitment Selection and Enrolment Procedure:

- Refer to domestic student enrolment procedure and International Student Recruitment Selection and Enrolment Procedure

7.5 Student Files:

- Once the student is enrolled in a course a student file is prepared by the SSO and or Student Administrative officer
- The file is checked in accordance with the student checklist by the Student administration officer/SSO
- The student is then enrolled on the VETtrak in the course they have applied for

7.6 Address and contact details:

- Students are advised during their orientation at the beginning of their course of the visa requirement to advise ETEA of any change in their contact details, such as a new Australian residential address and contact telephone number.
- To confirm current student contact details (address, mobile and email if any), the Student support officer (SSO) will email students at 6 month intervals from their commencement date.
  - If the student does not respond the SSO will try and get in touch either by:
    - calling the student up,
    - sending a letter to the last available address
    - Informing the student’s trainer to ask the student to get in touch with the SSO to update his/her contact details

Domestic Students

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- Domestic students are advised during the orientation that any change to personal details would need to be sent in writing to the Student Administration Officer

Note:

- All changes to the student contact details both domestic and international must be provided in writing by the student either by using the Change to the student details form or via email.
- Once the student informs of the change to their contact details, it needs to be updated on VETtrak and a copy of email or the form should be stored in the student file

#### 7.7 Attendance Procedure:

- As a result of the implementation of the DEEWAR- DIAC COURSE PROGRESS POLICY and PROCEDURE ETEA does not report students who fail to meet the required attendance level.
- To mark the attendance the trainers provide the students a paper with the unit and date written on it and circulate in the class for students to write their name and sign.
- The trainers at the end of the day provide this to the student administration officer who enters the attendance on VETtrak
- At the end of each month an attendance report is printed out from VETtrak and provided to the trainer to sign.

#### 7.8 Fees:

- All fees collected are to be paid into a bank account of ETEA, including a pre-paid fee account for international students.
- A receipt will be issued by ETEA to the student at the time, or immediately after fees are received and cleared by the bank.
- In each students file record ETEA will maintain evidence of course money the student has paid including
  - The qualification paid for
  - The total length of the qualification in weeks
  - The total weeks of the qualification that the fees apply to
  - Receipt numbers for each payment
  - Any balances that the student is liable for and has not paid
- Requests for refunds must be processed in accordance with the fee refund policy and recorded in individual students file.

#### 7.9 Notification to ASQA

The following are some of the matters but not limited to, that must be lodged with or reported to ASQA

- Any application for extension to scope of registration
- Provide details, if requested, of the ASQA, of all operations within its scope of registration including operations in other States or Territories and outside Australia
- Advise ASQA that ETEA has commenced operations in any other State or Territory within 21 days of commencing the interstate operation
- Provide ASQA with accurate and timely information regarding registration and compliance (including major changes to ETEA system or staffing profile, relocation of ETEA, financial difficulties and transfer of client records)
- Changes in student capacity
- Changes in location and contact details
- Changes in course fees, duration and hours
- Changes in key personnel

#### 7.10 PRISMS reporting procedure:

The SSO is responsible for issuing a CoE (Confirmation of Enrolment) for the student and is also responsible to record the following course variations within 14 days of the event **and** in accordance with ESOS requirements and procedures documented in the PRISMS User Manual

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- 1) Termination of student studies prior to completing the course. (i.e. prior to the CoE end date) 19(1)(d)
  - Student completed course early
  - Student left provider – transferred to course at another provider
  - Student notifies cessation of studies
  - Provider decision to cease student enrolment
    - Non payment of fees
    - Disciplinary reasons
    - Student has died
    - No longer holding a student visa
    - Provider unable to deliver course
- 2) Non-compliance with student visa conditions 19(2)
  - Unsatisfactory course progress
- 3) Non-commencement of studies 19 (1)(c)
- 4) Deferring/suspending student enrolment 19 (1)(f)
  - Compassionate or compelling circumstances
  - Student misbehaviour
- 5) Student requests change to existing enrolment 19 (1)(e)

7.11 Transfer between registered providers:

- The request for release, letter of release, and any related documents will be placed in the individual student file and recorded in the Transfer register by the SSO. (Please refer to the Transfer between registered providers policy and procedures for further details.)

7.12 Complaints and appeals:

- The complaint or an appeal filed by the student and the action taken against the complaint or the appeal is filed in the Complaints and appeals folder and logged in the complaints and appeals register.
- The appeals related to Section 20 notices are documented in the individual student file and the Section 20 register.

7.13 Course Progress:

- The ISM letters sent out to the student, the ISM meeting form and the details of the meeting, the timetable for the student and the follow up are all recorded in the ISM register and maintained on individual student file.
- All the documents related with section 20 i.e. Intention to report letters sent out to students, Student appeals process related to the Section 20 and student reported in PRISMS will be placed in the individual student file and documented in the Section 20 register.

7.14 Completion within the expected duration of study:

- Generally students are expected to complete their course within the expected duration of study as recorded on the CRICOS register.
- Generally a full-time student load is 20 to 21 hours scheduled attendance per week.
- At the commencement of each study period the student is required to register on the 1<sup>st</sup> day of the block at their respective administration office. The student who fails to register will be sent a letter to register themselves on a new date. The failure to respond to the letter will lead to early intervention strategy.
- ETEA may extend the duration of the student’s study where it is clear that the student will not complete the course, as specified in the CoE as the result of :
  - compassionate or compelling circumstances; such as, illness and where a medical practitioner’s certificate states that student is unable to attend class or where ETEA was unable to provide a pre-requisite unit;
  - ETEA is implementing its intervention strategy for students at risk of not meeting satisfactory course progress; or
  - where ETEA has approved the deferral of commencement of studies or the suspension of study under Standard 13.

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- Any extension to the duration of a student's course must be notified by ETEA on PRISMS and if necessary a new CoE issued.
- Any extension to the duration of a student's course, and the reasons for the extension must be recorded by ETEA on the student's file.

7.15 Course Credit:

- The RPL/Credit transfer application form with the result and related documents will be placed in the individual student file. (Please refer to the Course Credit policy and procedures for further details.). An RPL or Credit Transfer register can be extracted from VETtrak.

7.16 Deferral of commencement, suspension of studies, cancellation of enrolment Policy:

- The Student Deferral/Suspension/Cancellation/Withdrawal Form, related documents provided by student, Cancellation of enrolment letter, Refusal to allow a deferment of commencement or suspension of studies letter, Approval of Suspension of studies letter will be documented in the *Deferral of commencement, suspension of studies, cancellation of enrolment register* and placed in the individual student file.(Please refer to the Deferral of commencement, suspension of studies, cancellation of enrolment Policy)

7.17 Confidentiality and access to records:

- Student Information is collected in order to meet obligations under the ESOS Act and the National Code 2018; to ensure student compliance with the conditions of their visas and their obligations under Australian immigration laws generally. The authority to collect this information is contained in the Education Services for Overseas Students Act 2000, the Education Services for Overseas Students Regulations 2001 and the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007. Information collected can be provided, in certain circumstances, to the Australian Government and designated authorities and, if relevant, the Tuition Assurance Scheme and the ESOS Assurance Fund Manager. In other instances information collected can be disclosed without student consent where authorised or required by law.
- Student results can be obtained by a student by putting in a request in writing.

7.18 Staff :

- Refer to the Staff Policies, procedures and forms for details.

7.19 Continuous Improvement:

- Refer to the continuous improvement policy and procedure for details.

7.20 Refunds:

- Refer to the Refunds policy, procedure and refund application form for details.

7.21 Monitoring and Reviewing:

- The Quality Management Committee is responsible for Monitoring and Reviewing of the Records.
- All the outcomes will be documented in the QMC task list.
- ETEA will monitor and review its records in the following manner:
  - Will conduct meetings and the meeting of the minutes will be documented in the Quality Management Committee folder.
  - Feedback from staff and clients at the end of the year. Analysis of the feedback will be documented on the QMC task list.
  - ETEA will monitor and review its records by conducting an internal audit based on the Audit schedule.
  - The audit schedule is maintained under the M drive/ policy and procedure folder /HCG folder/Audit policy

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7.22 ETEA will not store the records in accordance with the VTG contract requirement

- o All documents including student enrolment, eligibility requirement, fees charged, participation of evidence record, training plans ( individual learning plans) will be archived electronically on the J drive for 7 years post completion.

**8.0 Preparing the Audit Schedule:**

The audit schedule will be prepared at the end of each academic year by the Compliance Executive Officer.

The audit schedule is a live document and though the basic procedure for all stages remain the same the outcomes may be amended as and when the gaps are identified.

The audit will be conducted in a progressive manner and hence a schedule will be prepared in order to maintain:

- Compliance with the RTO and ISO standards
- Compliance with organisation’s own policies and procedures
- Opportunities for improvement.
- Compliance with the government funding contracts

The results of the internal audits will be logged on the QMC task list with the details of rectification.

Disclaimer: Once this document is removed from the owner drive or printed this document is no longer controlled.

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