

THIRD PARTIES & SUBCONTRACTING POLICY

Education Is Key (EIK)

PURPOSE

This policy and procedure ensures **Education Is Key (EIK)** meets all relevant legislative and contractual requirements relating to third-party arrangements, including:

- The Australian Skills Quality Authority Standards for Registered Training Organisations
 - Compliance Standards – Division 3: Accountability – Third Party Arrangements
 - Fit and Proper Person Requirements
- State and Territory Government Funding Contracts (where applicable)

SCOPE

This policy applies to all **Education Is Key personnel**, including:

- CEO / Director
- Compliance and Quality staff
- Trainers and Assessors
- Administration staff


PROCEDURE

Education Is Key retains full responsibility for all training and assessment services delivered under its RTO registration, regardless of where or by whom the services are delivered.

This includes responsibility for:

- Accurate data reporting
- Compliance with ASQA requirements
- Adherence to advertising and marketing standards
- Provision of clear and accurate information to prospective learners
- Management of complaints and appeals
- Fee collection and financial processes
- Record keeping and documentation

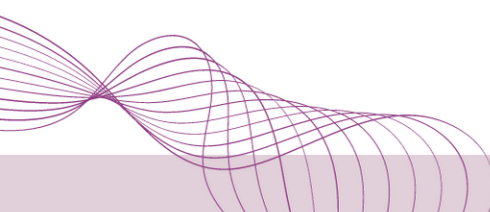
Julie Armstrong
Managing Director

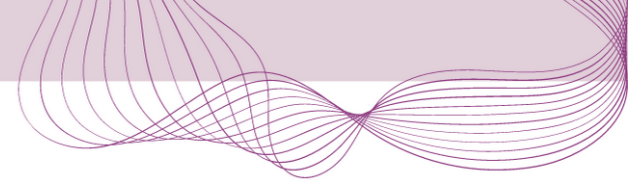
 0439 315 448

 educationiskey.com.au

 35/32 Queens Road, Melbourne 3004

 info@educationiskey.com.au





THIRD PARTY ARRANGEMENTS

Education Is Key may engage third parties **for the recruitment of learners only**.

All third-party arrangements are managed in accordance with the following:

- All third-party arrangements must be documented in a **formal written agreement**
- All agreements must be **reviewed and approved by the CEO/Director (Julie Armstrong)** prior to commencement
- Education Is Key ensures that any services delivered on its behalf comply fully with the Standards for RTOs at all times
- All third-party agreements must be **declared via ASQAnet within 30 days** of the agreement commencing and ceasing
- Notification to ASQA must be completed by the CEO/Director and include a signed declaration
- All agreements are stored electronically within the **Education Is Key Quality Management System**
- Third parties **must not use the NRT logo** in their marketing or materials
- Third parties **must not issue Statements of Attainment or Testamurs** on behalf of Education Is Key

FIT AND PROPER PERSON REQUIREMENTS

Under ASQA requirements, any individual who exercises a level of control or influence over the management or operations of the RTO must complete a **Fit and Proper Person Declaration**, submitted via ASQAnet.

1. VET in Schools (Auspice Arrangements)

Education Is Key does not consider school-based personnel (e.g. Principals, VET Coordinators) involved in auspiced delivery to be persons with control or influence over the RTO.


While schools may:

- Recruit learners
- Promote programs
- Support delivery within the school environment

They do not influence:

- Business or financial decisions
- Marketing strategy or brand control
- Operational or compliance decisions
- Insurance or risk management

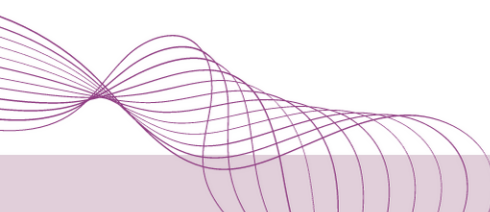
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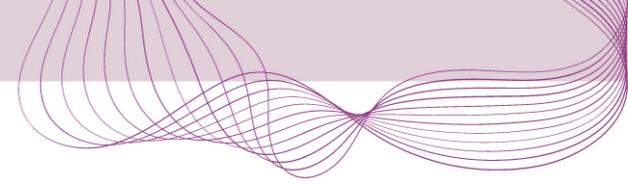
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2. Industry and Partnership Arrangements

Where Education Is Key collaborates with industry bodies, employers, or advisory groups for consultation, co-design, or continuous improvement:

- These partners **do not hold any control or influence** over business, operational, financial, or marketing decisions
- These arrangements are considered part of **industry engagement**, not third-party delivery

3. Education Is Key Leadership

The CEO/Director of Education Is Key, **Julie Armstrong**, holds responsibility for:

- Strategic direction
- Operational oversight
- Financial management
- Compliance and regulatory obligations

As such, the CEO/Director is required to complete and maintain a **Fit and Proper Person Declaration** in line with ASQA requirements.

SUBCONTRACTING


Education Is Key **does not subcontract training or assessment services.**

All training and assessment is delivered directly under the control and supervision of Education Is Key.

RELATED POLICIES & DOCUMENTS

- Quality Management and Compliance Policy
- Third Party Register (Compliance and Quality Register)
- Marketing and Advertising Policy
- Complaints and Appeals Policy

Julie Armstrong
Managing Director

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