

Policy – Internship Framework

Navitas Professional
ABN 25 100 404 199

Document

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Responsibility	Industry Engagement Manager, NP
Initial Issue Date	27 October 2015

Version Control

Issue Date:	Summary of Changes	Review Date
27 October 2015	Initial Document, v1.0	27 October 2017
2 May 2016	Update position titles, v1.1	27 October 2017
1 August 2017	Include clause on internship duration and remote internship processes, change policy responsibility, remove EEP v2.0	27 October 2017
1 July 2018	Change of Business Unit name; update in line with review, inclusion of Host Company Benchmarks; Change SMIPA v3.0	1 February 2020
22 October 2019	Change of policy ownership from National Business Manager to National Business Development Manager, Update Professional Body requirements, v4.0	22 October 2020
20 May 2020	Update to reflect the changes to ACS PY Internship Framework, v5.0	20 May 2021
25 November 2020	Update position titles and policy custodian, v5.1	20 May 2021

1 Purpose and Scope

The purpose of this policy is to provide a fair, equitable framework and procedure for Internships programs.

This policy and procedure applies to all participants enrolled in a Navitas Professional program.

2 Policy

2.1 Provision of information

- 2.1.1 Participants are provided information on the Internship phase of their course prior to enrolment, during the participant orientation process and in the Participant Handbook.

2.2 Internships Arranged by Navitas Professional

- 2.2.1 All Internships arranged by Navitas Professional (NP) will:

- Commence after completion of any coursework components of a program.
- Include an agreed Training Plan where the specific training outcomes are determined and monitored.
- Be supervised by a Host Company mentor who is able to assist the intern to achieve all elements of the Training Plan.
- Be a supernumerary in the role – i.e. not taking a role that would be normally expected to be filled by a paid employee (e.g. not having an intern to do the company IT when there is no IT person employed).
- Have no formal 'employer-employee' relationship established, including Workers Compensation cover, which is provided by NP.
- Not extend beyond the agreed period as stipulated in the Provider Agreements. See Appendix A.
- Be at a Host Company which meets the benchmarks as detail in Appendix D.
- Directly relate to the participant's qualifications and include a minimum of 70% of graduate entry work or higher. Interns should not be regarded as the 'junior employee' and required to do tasks such as coffee making, photocopying, lunch area cleaning etc. Interns will also work a normal roster such as other staff would be assigned.
- Be with host companies who are highly supportive of the intern role, an organisation that has a 'revolving door' of interns will be monitored closely to ensure the intern role is not being used as a de facto employment role whereby a permanent paid role should be in place.
- Ensure that if an internship is 'paid', the rate must be at the minimum award rate or above.
- Host Companies can provide support during an unpaid internship which might include specific things such as an accommodation allowance, meal allowance, travel allowance or similar. These are not regarded as 'payment', but also need to be in-line with expected expense reimbursement.

- 2.2.2 Remote location Internships NP will follow the processes as outlined in Appendix C.

2.3 Navitas Professional Core Programs

2.3.1 Professional Year Program

The Professional Year Program (PYP) is a DHA gazetted program, introduced to mitigate some of the key skills shortages in Australia. The program is a 44-week course designed to bridge the gap between university and a career for Accounting, IT and Engineering graduates. The program runs for 44 weeks and is split into 32 weeks of theoretical knowledge (part time study) followed by a 12 week unpaid internship. Upon successful completion of the program, graduates may be eligible for migration points.

2.3.2 Career Experience Program

The Career Experience Program (CEP) is a course specifically designed to launch student's careers through developing work readiness skills, in a local environment, as well as providing important training in support of this. The program comprises 6 weeks of face-to-face part time theoretical study followed by an internship. Internships may be undertaken part-time or full-time. The minimum internship duration is three days per week over eight weeks up to the full-time duration of five days per week over 12 weeks.

2.3.3 Navitas Professional Internship Program

The Navitas Professional Internship program (NPIP) provides students and graduates with internship placements that lead to professional and personal growth for better career prospects. The program comprises 3 units of online theoretical study followed by an internship. Internships may be undertaken part-time or full-time. The minimum internship duration is three days per week over eight weeks up to the full-time duration of five days per week over 12 weeks.

2.3.4 Navitas Professional Work Integrated Learning (WIL) Partner Programs including University Graduate Programs.

This is a suite of career readiness activities designed for institutions who are seeking to provide students with both work-readiness preparation and access to industry placements opportunities. WIL is a fully customisable program, working with tertiary institutions to develop tailored packages that meet the needs of students, education providers and future employers.

3 Procedures

3.1 Internship Placement

3.1.1 Pre-enrolment

- IPCs will conduct pre-enrolment interviews with the BDCs to assist in determining eligibility for the applicant's selected program and to identify any challenges for placement.
- Where the IPC identifies challenges for placement, which may be remedied, the IPC will liaise with the trainer and State/Territory Operation Manager/ to determine remedial strategies.
- Where the IPC determines the applicant is unsuitable for placement, the IPC may recommend to the State/Territory Operation Manager that the applicant not be accepted into the program. The State Operation Manager/Territory Operation Manager will make the final determination for acceptance into a program.
- During the application process or during class all participants will be required to put their resume into the required CV format.

3.1.2 Student Preliminary Interviews

- IPCs will conduct a preliminary face-to-face interview with participants. Allowing the IPC team to assess participant's communication and interview skills, to go over resumes and suggest improvements. This should happen approximately 4-6 weeks prior to completion of the coursework component before internships are due to commence.
- IPCs will complete the pre-placement questionnaire on SONIA
- Each participant will be allocated an Industry Placement Consultant, who will:
 - Advise participants to treat the preliminary interview like a formal interview, including being dressed appropriately, be on time etc.
 - Provide participants with feedback on areas for improvement.
 - Obtain a report from the Program Trainer on the participant's course performance
 - Liaise with the Program Trainer and the State/Territory Operations Manager on the appropriate action taken to address issues identified at enrolment that require remedial action.
 - Will consult with the participants to achieve a suitable internship placement; participants will not have the option of choosing the Host Company.
- A participant who rejects an internship opportunity should provide reasons, in writing, as to why they do not wish to proceed with the proposed internship. Participants who provide compassionate or compelling grounds should be given other interview opportunities. Disputes around such issues should be managed by the IPC Team Leader or State/Territory Operations Manager as appropriate.
- Participants who refuse two internship interviews or appropriate placement opportunities, without compassionate or compelling circumstances, will be required to source their own placement.
- Where a partnership agreement exists, refer to the guidelines for specific procedures.

3.1.3 Short Listing:

- Prospective Host Companies will be sent a shortlist of suitable internship candidates' resumes by the IPC to enable them to identify whom they wish to interview.
- Information provided to prospective Host Companies may include: resume; Academic transcript or other proof of qualification; personal details including name, address, email and phone contact information.

3.1.4 Interview with Host Companies:

- Host companies must interview participants before accepting them as an intern. Note. On occasions, phone interviews and/or videos may be sent to HC as a form of introduction and selection process.
- Participants will be advised to treat the Host Company Internship interview like any formal job interview.
- Participants should ensure that they dress appropriately and arrive on time.
- Where a participant is unsuccessful, they must be given feedback on their interview, given coaching, if required, and shortlisted to further companies.
- Interviews, both successful and unsuccessful should be logged in the student management/internship placement software SONIA
- Note: participants are not required to purchase their own PPE or organize job fit-medicals as part of the pre-internship placement process should they be required by the HC. However, any additional licenses that a host company might require as an “essential” at the shortlisting stage are the student’s responsibility to source and obtain (e.g. White Card, Driving License etc.).

3.2 Internship Documentation Navitas

The documents required for internship compliance, must be received and saved into files electronically and uploaded to SONIA.

Failure to obtain the following four documents is a breach of the requirements of the vocational training program:

3.2.1 Vocational Placement Descriptions

- It is a Navitas organisational requirement that a detailed vocational placement description (can also be a Position Description or Job Description) should be obtained from the Host Company for each intern. This should include:
 - the name of the host organisation,
 - the host organisation logo,
 - a detailed outline of the training and activities to be conducted during the course of the internship.
 - Effective from 1st June 2020, ACS requires that all internship roles are attached to an appropriate ANZSCO occupational code.
- Bullet points in an email do not constitute an appropriate JD/PD/VPD.
- A Vocational Placement Description should not be generic or recycled. A new one should be created for each intern the Host Company accepts, or at the minimum, updated regularly.

3.2.2 Internship Agreement

- Once a participant has been accepted by a Host Company, a Host Organisation Agreement must be signed by all three parties (Navitas Professional, Host Company and participant).
- A signed copy should be given to both the Host Company and the intern, and a copy must be added to the participant’s electronic file on SONIA.
- The agreement must be signed before an intern enters the Host Company’s premises for the first day of their internship to ensure all parties are insured. There are no exceptions to this rule.

3.2.3 Mid Review

- The Mid-Review is conducted by the IPC at approximately week six of the internship placement. This review is ideally done onsite. Separate interviews will be conducted with the intern and the Host Company separately to monitor and capture genuine feedback relating to the intern's progress against the training plan.
- An IPC must visit each intern, at their host organisation, at least once during the course of their internship.
- Internships in remote areas are the only exception to the above rule. For remote placements (e.g. mining or construction projects), a video teleconference interview should be conducted with both the Supervisor and Intern. If video teleconference is unavailable, a telephone interview will suffice.
- Mid Review Reports should be detailed and include comments from the Supervisor, Intern and IPC in the respective sections of the report.
- All Internship reports should be signed by the Supervisor, Intern and IPC, so that their authenticity can be established.

3.2.4 Training Plan

- A copy of the plan should be provided to the Host Company and the participant at the commencement of the internship. This will ensure the Supervisor is aware of what behaviours to assess over the course of the internship.
- Training Plans must also be signed by the Intern and the Host Company Supervisor. The Supervisors are welcome to make supplementary comments and or reports

3.2.5 Host Company Checklist

- IPCs must complete the Host Organisation Checklist indicating compliance with WHS requirements and Navitas Professional Host company benchmarks (see Appendix D) including minimum staff and minimum supervisor qualifications.

3.3 Internship Documentation – Participants

Depending on the participant's professional association, i.e., the ACS, EEA and Accounting, there will be assessments and/or homework to complete during the internship period that relate only to the professional year and internship and do not form a part of the assessments for the BSB40215 Certificate IV in Business as follows:

3.3.1 Australian Computer Society

- Participants will be required to complete the Professional Environment (PE) online assessments and homework as a part of their course requirements. Details regarding the PE Assessment including the login and the password will be sent to participants via email by ACS.
- Failure to keep up-to-date with the Professional Environment work on a weekly basis may result in the participant being withdrawn from this component by the ACS. In this case the ACS may elect to remove the participant from the program, or stipulate that they repeat the Professional Environment component, from the beginning, at an extra charge of \$900 plus GST.

3.3.2 Engineering Education Australia

- As a mandatory EEA requirement Engineering participants are to submit a Work placement and events Report to EEA directly. The Events Register is a record of events attended by the participant whilst they are enrolled in the Professional Year. The IPC is not required to collect this EEA report.

3.4 Participant Conduct during Internship

- 3.4.1 Participants will be treated the same as an employee within their Host Company, so will be required to act accordingly, as outlined in the Workplace Protocol Handbook available on Moodle. Participants are expected to behave professionally throughout their placement. Professional behaviour includes:
- speaking in English at an appropriate level in the workplace;
 - ensuring that they are punctual and dress suitably for the Host Company environment;
 - adhering to all Host Company policies such as IT, WHS and Codes of Conduct; and
 - exhibiting behaviour as expected in the workplace i.e. treating colleagues and managers with respect, acting in a professional manner at all times etc.
- 3.4.2 Any participant who displays unacceptable or disruptive behaviour during their internship may be asked to leave the internship or source their own suitable internship.
- 3.4.3 The appropriate external authority will be informed where the alleged misconduct under investigation is considered to warrant intervention or action from an external agency

3.5 Removal from internship – Host Company Request

- 3.5.1 Where a company asks an intern to leave, the request must be in writing and needs to include as much evidence (dates and specific incidents) as possible.
- 3.5.2 The IPC and State/Territory Operations Managers will assess the situation and advise the participant and Host Company on the recommended course of action.
- 3.5.3 Where a participant's behaviour is deemed unacceptable and unprofessional the participant will be notified in writing that they will be removed from the internship.
- 3.5.4 Where the incident is not severe enough to justify completely removing the participant from the internship the State/Territory Operations Manager will decide whether or not they will be placed with another company and undertake the entire process again.
- 3.5.5 The appropriate external authority will be informed where the alleged misconduct under investigation is considered to warrant intervention or action from an external agency

3.6 Removal from internship – Participant Request

- 3.6.1 If a participant requests removal from an internship placement this will be managed on a case by case basis by the IPC and in consultation with their SOM

4 Responsibilities

- The **General Manager, NP** is accountable for the ongoing development, approval, implementation, awareness and effectiveness of this Policy and the supporting processes and documentation.
- The **Industry Engagement Manager, NP** and **State/Territory Operations Managers, NP** are responsible for ensuring that all team members are aware of this Policy and their responsibilities defined herein.
- **NP employees** are responsible for being aware of, and complying with this Policy.

5 Definitions

Unless the contrary intention is expressed in this Policy, the following words (when used in this policy) have the meaning set out below:

DHA –Department of Home Affairs

IPC – Industry Placement Consultant (Navitas Professional)

SONIA – Student management/internship placement software

WHS - Work Health and Safety

HC – Host Company

6 Review

This document is reviewed every 2 years by the relevant manager to ensure alignment to appropriate strategic direction and its continued relevance to Navitas Professional’s current and planned operations.

The next scheduled review of this document is listed in the Version Control section on Page 1.

7 Records

All records in relation to this policy will be managed as follows

Record type	Responsible	Location	Retention
Participant File	State Administration Office	Participant File – NP SDL	7 years
Host Organisation Agreement	IPC Team	SONIA	7 years
Job Description	IPC Team	SONIA	7 years
Mid Review Report	IPC Team	SONIA	7 years
Training Plan Report	IPC Team	SONIA	7 years

8 Related documents

- IPC Induction Manual
- CEP Participant Handbook; NPIP Participant Handbook; PYP Participant Handbook
- ACS Professional Year Provider Manual
- ACS Professional Year Internship Framework
- Accounting Professional Year Provider Manual
- Engineering Education Australia (EEA) Professional Year in Engineering Guidelines for Delivery Partners
- NP-01.01-06P Complaints and Appeals Policy
- Workplace Protocol handbook
- Mid-review Report
- Host Organisation Agreement
- Placement Program Training Plan
- Host Organisation Approval Checklist

Appendix A – Internship Duration Professional Year

ACS

The duration of an internship must meet the following key criteria:

- Must be undertaken over a minimum of 10 weeks
- Must include a minimum of 220 vocational placement hours

It is essential that participants commence their internships on the date scheduled at the time of their enrolment, as participants will also undertake the Professional Environments online subject – provided by ACS whilst they are doing their internships.

EEA

The internship must occur over 12 weeks and be at least 456-480 hours in total (a standard work week between 38-40 hours).

Accounting PYP

The minimum duration and intensity during the internship are as follows:

- a) a minimum of 240 hours of work experience
- b) a minimum of 10 weeks and a maximum of 16 weeks duration
- c) a minimum of 15 hours per week and maximum of 37.5 hours per week

Note: the recommended duration for an internship is 12 weeks at a minimum of 20 hours per week. Internships of less than 12 weeks must be approved by State Operations Manager and the reason for this placed on the participant file.

Appendix B – Internship Duration – Other Programs

CEP

Internships may be undertaken part-time or full-time at a minimum of three days per week over eight weeks up to five days per week over 12 weeks.

Navitas Professional Internship Program (NPIP)

Internships may be undertaken part-time or full-time at a minimum of three days per week over eight weeks up to five days per week over 12 weeks.

Work Integrated Learning Programs

As negotiated.

Appendix C – Remote Location Internship Process

Step 1

- IPC will conduct an initial face to face meeting with a representative of the host company, the meeting will take place at the Host Company Head Office, during the meeting the following will be established:
 - Number of employees
 - Hours of internship: Not to exceed 38-40 hours per week / Shift pattern to be established
 - Copy of Host Company Work Place Health and Safety Policy/Procedures
 - Vocational Position Description per internship opportunity
 - Certification required by the intern e.g. site safety certificates
 - Equipment required such as hard hats, safety footwear etc
 - Details of accommodation, travel, meal allowance (if applicable) and that will be provided by the host company
- Due to the nature of remote locations, conditions etc. it may be difficult for the intern to adjust and so with this in mind please ensure that you confirm with the host company that if for whatever reason the internship is terminated either by the host or the participant, the host will cover the cost of the return transportation.
- IPC to ensure that all information regarding type of transportation provided by the host, time of travel to the location including the daily time of commute, is established and communicated to the participant prior to being introduced to the host.
- Details of Supervisor/Mentor allocated to the intern and who is responsible for reporting on the participants progress during the period of internship.
- IPC will run through all documentation and the process of managing the interns progress during the period of internship
- EEA allow a teleconference e.g. Facetime/Skype/Zoom site inspection and mid review for remote placements.
- Accounting PYP and ACS initial site inspection must be undertaken in person.
- For ACS, regional and remote placement to be forwarded for approval. ACS reserves the right to decline the remote or regional placement, as well as the requested site inspection method.

Mid Term Review = (Week 6)

- The mid-term review will take place via teleconference e.g. Skype or Zoom, this will include the Internship Placement Coordinator, Supervisor/Mentor and Intern. Upon completion, the review document will be signed by both the Supervisor and returned to the Internship Placement Coordinator.

End of Internship = Training Plan / End Review (Week 12)

- A Training Plan will be provided to the Host Company at the commencement of the internship. This will ensure that the Supervisor/Mentor is aware of the behaviors to assess during the period of the placement. The Training Plan will include a monthly review, where a brief of the reviews will be recorded, a competency based tick sheet and a comments box for both the Supervisor/Mentor and participant to provide their final feedback. Supervisors / Mentors and participants are welcome to provide additional information/reports if applicable.
- Training Plans must also be signed by the Supervisor/Mentor and participant prior to returning to the IPC during the final week of internship.

Appendix D – Host Company Benchmarks

1. Minimum number of Employees to Interns

- Minimum 10 permanent employees to host Interns (as per EEA guidelines)
- For ACS
 - Organisations with 50+ permanent employees on-site, and a dedicated ICT Department of five or more paid ICT Staff, may have **up to ten concurrent ICT placements** from any PY
 - A minimum of 10 permanent employees, with at least one paid ICT staff member, may engage **no more than five concurrent ICT placements** from any PY Provider in a 12-week period ensuring all intern work meets Fair Work definitions and requirements
 - A small organisation with 3-9 permanent employees, which can provide the supervision and support requirements (see Section 3.4 ACS PY Internship Framework Feb 2020) may engage **no more than three concurrent ICT placements** per day from any PY Provider in a 12-week period ensuring all intern work meets Fair Work definitions and requirements
 - A start-up (e.g. sole trader or organisation with less than three permanent employees) which can provide the supervision and support requirements (see Section 3.4 ACS PY Internship Framework Feb 2020) may engage **no more than one concurrent ICT placement** from any PY Provider in a 12-week period ensuring all intern work meets Fair Work definitions and requirements
- Recommendation: NP recommend that no one supervisor mentor more than one Intern at any one time.
- Note: The minimum is applied as a benchmark for all three PY streams
- EEA allow 2 PYP Engineering students with 1 supervisor as long as students will be doing good engineering work and meet the minimum 10 employees
 - To be assessed on a case by case basis
 - Not applicable to new host companies
 - Contact/check in after 1 week into internship
- Smaller States/Territories: NT, TAS and ACT are classified as smaller regions, therefore minimum employees would be considered as follows;
 - Accounting: minimum of 5 employees
 - ACS: will consider placements in organisations of less than 10 employees on a case by case basis
 - EEA: will consider placements in organisations of less than 10 employees on a case by case basis

2. Supervisors Qualifications

- Appropriately experienced supervisor(s) to deliver training and provide mentorship.
- Assessed and recorded using working example below
 - Engineering:
 - Preferred member of EA
 - Minimum: Undergraduate degree in the field of discipline, or 10 years industry experience.
 - Accounting:
 - Member of one of CA, CPA or IPA
 - Minimum: Undergraduate degree in the field of discipline, or 10 years industry experience.
 - IT
 - Preferred member of ACS
 - Minimum: Undergraduate degree in the field of discipline, or 10 years industry experience.
 - Other Industries
 - Preferred member of Professional Body linked to the field

- Minimum: Undergraduate degree in the field of discipline, or 10 years industry experience.

3. Organisation Requirements

- Registered company with and ABN/ACN
- Ability to provide training in line with the Interns Job Description
- Capacity to allocate a supervisor qualified in the relevant field.
- Agrees to the Terms & Conditions of a Professional Year Program Internship; understands the aims, purposes and outcomes sought.
- Suitably located and accessible; has a professional office (i.e. not a home office). Located usually within 1-1.5 hours of where the student lives and is accessible by public transport.
- The internship is supernumerary.
- WHS requirements
 - Provide their WHS policy – if they have one.
 - If no to the above, provide Navitas Professional with a generated WHS policy as a guideline or links to State codes of practice
 - Prepared to undergo site inspection if location permits and meets checklist requirements
- ACS additional host organisation requirements/considerations;
 - ICT internship roles available within the business (and relevant ANZSCO codes)
 - Number of dedicated ICT staff employed in paid roles
 - Total number of PY interns who have undertaken internship placement with company over the last 12 months
 - Provider in a 12-week period ensuring all intern work meets Fair Work definitions and requirements
- Quality audited by NP to ensure it meets the minimum standards and understands the quality processes for all aspects of the operation of the internship

4. Periodic Host Company Reviews

- Review of Host Companies should be carried out every 12 months to ensure they continue to meet the guidelines set by Navitas Professional
 - Note: Employment is not an outcome of the Internship, however employment rates should be monitored when reviewing Host Companies. It is acceptable if a host company does not employ anyone if the interns they have hosted have been developed to a point where they are readily employable, and find work within three (3) months of their internship. However, for host companies that often host interns, but do not employ ensure that there are 'breaks' throughout the year.

5. Found Own Employment (FOE)

- The same standards apply to FOE. Host Companies will need to undertake the same quality assessment as outlined above. Refer to the flexibility note for any variations.

Flexibility Note: The above definition should be used as a strict guide. **Flexibility** will only be allowed to be sought on a case-by-case basis. Such requests are to be forwarded to the National Operations Manager who manages the relationship with the Professional Bodies. Flexibility requires approval from the Professional Body.

For ACS, the student must provide the position description or training plan and corresponding ANZSCO code. If employment is current, two of the student's most recent payslips with the company ABN listed.

For ACS self-sourced placements, refer to the ACS Professional Year Internship Framework (v2.0 Feb 2020).