

Allara Global Policies and Procedures

Last Updated: April 5, 2025

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Definitions

Stakeholder - means a Client, Learner, Allara Global staff, industry representative, government department that has a direct involvement in the training and assessment process.

SME - means a subject matter expert that has relevant skills and knowledge required to provide realistic advice regarding the content of resources developed.

Total Fees - Total fees include enrolment fees.

Third-Party - An individual, organization or Stakeholder providing training and/or assessment and/or other services on behalf of Allara Global.

Training product - means, a course, accredited course, skill set, or unit of competency currently or previously endorsed by the ANAB.

"Three lines of defense" model - Allara Global has adopted a three lines of defense model approach to compliance against the Standards for Certificate Programs, which clearly identifies the roles of the business operations (First Line), compliance and assurance (Second Line) and internal audits (Third Line). First Line business operations are responsible for procedural compliance and ensuring Certificates and Certifications are issued in accordance with industry standards and rules. The Second Line of defense is responsible for ensuring procedures comply with industry standards and undertakes testing to ensure procedures are consistently and accurately understood and followed. The Third Line of defense independently reviews and challenges the effectiveness and accuracy of the operation of the First and Second Lines of defense and provides assurance to the CEO of Allara Global, on Allara Global compliance and progress on any areas identified for continuous improvement.

Customer Success Manager - means, the role is responsible for client administration, enrolment, provision of assistance to participants, employers and Stakeholder.

(1) Advisory group composition and responsibilities

The Advisory Groups for all Allara Global Certificate Programs are composed of a balance of industry and regulatory stakeholders. The representatives include industry and regulatory so that the Group will represent a balance of interest and expertise from primary stakeholders. The staff liaison will be the Designated Authority.

The Advisory Group will meet as part of any Program Evaluation (at least annually and as-needed) or when changes are proposed to the certificate program target audience, purpose, scope, requisite, certificate term, intended learning outcomes and/or instructional design plan. The Advisory Board shall advise Allara Global management on creating and maintaining certificate programs that are current, relevant, and valued.

1.1 Advisory Group members

The staff liaison will be the Designated Authority.

Member	Position	Stakeholder	Email Address
<i>Michael Maxwell</i>	<i>Restaurant Consultant</i>	<i>Food Handler/ Food Retail Operator</i>	<i>michael@blueorbiting.com</i>
<i>Joe Alessandroni</i>	<i>Hospitality Manager</i>	<i>Food Handler/ Food Retail Operator</i>	<i>josepha@blueorbiting.com</i>
<i>Gabriel Bastidas</i>	<i>Culinary Director</i>	<i>Food Handler/ Food Retail Operator</i>	<i>gabrielb@blueorbiting.com</i>
<i>Jordan Alexandria</i>	<i>Associate Restaurant Consultant</i>	<i>Food Handler/ Food Retail Operator</i>	<i>jordana@blueorbiting.com</i>

1.2 Advisory Group

The Advisory Group will meet as part of any Program Evaluation (at least annually and as needed) or when changes are proposed to the certificate program target audience, purpose, scope, requisite, certificate term, intended learning outcomes and/or instructional design plan.

1.3 Required tasks and qualifications of Advisory Group members

Advisory Group members are expected to consistently demonstrate sound strategic and decision-making skills. They must be familiar with all aspects of each program they are involved in and adhere strictly to the confidentiality requirements outlined in their contracts.

1.31 Advisory Group member job description

- Advises Allara Global Certificate Program focusing on continuous improvement, monitoring program activities and reviewing changes to the Certificate Program Instructional Design Plan.
- Receives updates and provides feedback on items presented to the Advisory Group as part of the annual Program Evaluation.
- Provides input into to any changes to the certificate program's (1) target audience, (2) purpose, (3) scope, (4) requisites, (5) term, (6) intended learning outcomes, and (7) instructional design plan.
- Reviews program evaluation results, items for continuous program improvement and progress on corrective and/or preventive actions.

1.32 Advisory Group skills and qualifications

- Strategic
- Problem solver
- Time commitment: 2 - 4 hours a year via a web conference or email
- Decision maker and influences decisions in their organization/other organizations/industry/regulatory agencies related to training programs
- Is able to maintain confidentiality related to sensitive data
- Participative

- Has familiarity with or is able to become familiar with the ANSI ASTM 2659-18 Accreditation Standard for Certificate Program.
- Is familiar with the Allara Global Certificate Program assigned to

1.4 Convening

The Advisory Group meets at least annually via conference call. All relevant program documentation is sent to each member prior to the meeting via the documented Program Evaluation, along with any other materials requiring their review.

Once the meeting is in session, the Allara Global liaison will cover the material in the documentation. Throughout the presentation, members will have the opportunity to discuss any questions/concerns regarding the program plan and its execution over the previous reporting period. The Allara Global liaison will maintain Advisory Group meeting minutes for details regarding the Advisory Group feedback

(2) Certificate program Instructional Design Plan

2.1 Instructional Design Plan

All policies related to the program are contained within this Certificate Program Instructional Design Plan. These documents are maintained by the Instructional Design team with final approval given by the Head of Instructional Design. The Instructional Design team reviews the Plans for any changes at least annually and members of the Advisory Group review the Plans as a part of the overall program evaluation.

See files:

- Allara Global Instructional Design Model One-Pager
- Allara Global Instructional Design Plan

(3) Certificate issuance and use

3.1 Certificate issuance

Certificates are issued to examinees that have successfully completed the coursework and passed the assessment. Prior to taking the assessment, verification of course completion occurs so Certificates are issued if the examinee receives a passing score on the assessment. Certificates are printed from the Allara Global's secure web site using information that is available only to the examinee. Allara Global also provides specific instructions on how the Certificate may or may not be referenced.

Certificates are used to meet regulatory requirements (when applicable) or as proof of course completion to an employer. Certificates contain a QR (Quick Response) code that directs the user to input unique Certificate details. When unique Certificate details are entered correctly, the user will be directed to a secure page containing the examinee's last name and Certificate number. A person may scan the QR code into our Certificate lookup tool to determine if the Certificate is valid.

3.11 Information included on the Certificate

The Certificate issued will include the following:

1. Certificate holder's name
2. Certificate holder's identification number
3. Certificate title (which indicates the Certificate scope)
4. Designation the Certificate holder is granted to use
5. Allara Global as the Certificate issuer

6. Signature of Allara Global authorized agent
7. Certificate issue date and term
8. ANAB logo, if applicable

3.12 Property rights and individual authorized to sign the Certificate

Allara Global is the body authorized to issue Certificates and Allara Global, CEO, will be the signatory for Allara Global Certificates. The Certificate is the property of the Allara Global. Permission to use the Certificate is granted to Certificate holders at the discretion of the Allara Global for permissible uses only.

3.2 Certificate use

3.21 Persons authorized to use Certificate

Use of any ANAB endorsed Certificate issued by Allara Global is limited to those persons who have been granted the Certificate by Allara Global. Use of the Certificate by other individuals, organizations, or entities is expressly prohibited. The Certificate shall be issued to an individual and shall be non-transferable.

Participants must complete the online course and pass the Certificate exam with at least a 70% score to earn the Allara Global Certificate exam. Both activities must take place within a 30-day window, including:

- Completing all course activities within 30 days of enrollment.
- Scoring 70% or higher on the exam in one 90-minute session within that same 30 days.

[Food Handling Certificates are valid for a period of 3 years from the date of issuance. This timeframe is based on the FDA Food Code and widely accepted best practices, which recognize that regular training is essential to ensure food handlers stay current with evolving food safety regulations, technologies, and procedures. The 3-year renewal cycle balances the need for ongoing education with the operational realities of the food service industry. It also aligns with state and local regulatory requirements in many jurisdictions. To maintain compliance and ensure continued competency, food handlers must complete a recertification process prior to the certificate's expiration.](#)

3.22 Authorized use of Certificate

Allara Global Certificates may not be tampered with, and text or logos may not be added to them without the express written permission of the Allara Global. Certificate-holders and instructors may not portray themselves or imply that they are "certified", "certificated", "licensed", "registered", or "accredited" by Allara Global.

Certificate-holders may refer to their Certificate as an "Allara Global (Food Handler) Certificate" or "Allara Global California Food Handler Certificate". Certificate-holders may say that they are "Allara Global (Food Handler/Responsible Beverage Service) Certificate Recipients."

(4) Invalidating a Certificate

The Certificate issuer shall invalidate a Certificate only if the person it was issued to is found to have not fulfilled the Certificate program requisites. Circumstances that might lead to the invalidation of a Certificate include:

- Participant's falsification or misrepresentation of identity or information to the Certificate issuer, or
- Participant engagement in activities provided an unfair advantage in meeting the Certificate program's requirements.

Invalidation occurs only when it has been discovered that the Certificate should not have been issued in the first place.

(5) Complaints

5.1 Fair and equitable procedures

During all stages of this procedure Allara Global will take all necessary steps to ensure that:

- The complainant and/or appellant and the respondent will not be retaliated against or discriminated against;
- The complainant and/or appellant and the respondent will be informed of the allegations brought forth; and
- The complainant and/or appellant and the respondent are given the opportunity to formally present their case.

Each party to the complaint may be accompanied and assisted by a support person at any relevant meetings. If the Stakeholder is under 18 years old, a parent or guardian is requested to attend the interview/discussion.

Where more than **sixty (60)** calendar days are required to process and finalize the complaint or appeals process, the complainant and/or appellant and respondent will be notified of this in writing.

The internal grievance, complaints and appeals process is offered at no cost to the complainant and/or appellant.

5.2 Complaints procedure

Formal complaints must be submitted in writing to the Customer Success Team at helpdesk@allaraglobal.com. Upon receiving a complaint, the Customer Success Team is to:

- Enter the received complaint as a note to the client's account on the Allara Global Customer Management System; and
- Advise all parties of the complaint brought forth in writing.

The complaints process will commence within **five (5)** working days of receipt of the written complaint.

All reasonable measures will be taken to finalize the process as soon as practicable.

5.3 Complaints review process

The Customer Success Team will seek to clarify the outcome that the complainant hopes to achieve. Such clarification may be sought by email.

The Customer Success Team will endeavor to resolve the complaint, and provide within **ten (10)** working days of receipt of the complaint application, a written report to the complainant advising the:

- outcome of the complaint;
- steps taken to address the complaint; and
- reasons for the decision/outcome.

The report will further advise the complainant of their right to access the internal appeals process if they are not satisfied with the outcome of their formal complaint.

(6) Appeals

6.1 Appeals process

If a complainant is dissatisfied with the outcome of their formal complaint, they may lodge an appeal with the Designated Authority (who are not party to the original complaint) or Chief Operations Officer (if the Designated Authority is a party to the original complaint).

The Designated Authority or Chief Operations Officer will review the dispute between Allara Global and the appellant within **ten (10)** working days of receiving the written request for appeal.

The Designated Authority or Chief Operations Officer will provide within **thirty (30)** working days of appeal application, a written email to the appellant advising the:

- outcome of the appeal;
- additional steps taken to address the issue; and
- reasons for the decision.

All appeal decisions are final.

6.2 Outcome, actions and implementation

For all complaints and appeals, regardless of the decision and outcome, Allara Global will:

- implement any decision and corrective action required within **thirty (30)** working days of receipt of a written report; and
- notify all relevant Stakeholders of the decisions and recommendations.

6.3 Record keeping

Allara Global will record the complaint or appeal in the Allara Global Customer Relationship Management System client folder. Soft copy records relating to the complaint or appeal, include but are not limited to:

- Complaint emails
- Appeal emails
- Supporting documents

6.4 Responsible persons

6.41 Customer Success Managers

A Customer Success Manager is the designated member of staff to:

- Review complaints;
- Make a decision on complaints;
- Document outcomes on the Stakeholders file in the Customer Relationship Management System;
- Provide written reports to the Designated Authority (who is not a party to the original complaint) or Allara Global Chief Operations Officer.

6.42 Designated Authority

The Designated Authority is the designated member of staff to:

- Review appeals;
- Convene meetings with Stakeholders;
- Make a decision on appeals;
- Document outcomes on the:

- Stakeholders file;
 - complaints and appeals application forms; and
 - complaints register.
- Provide written reports to the Allara Global Chief Operations Officer.

6.43 Allara Global Chief Operations Officer

If the complaint and/or appeal is:

- In relation to the Designated Authority, or
- unable to be resolved by the Designated Authority

The Allara Global Chief Operations Officer is required to undertake the appeal process.

(7) Privacy, confidentiality, and security

Allara Global will ensure that it respects the privacy of staff, prospective staff, Participants, prospective Participants and employers by implementing the State of California's Data Privacy Protection Laws.

The *California Consumer Privacy Act* sets out how private sector organizations should collect, use, keep secure and disclose personal information. The principles give individuals a right to know what information an organization holds about them and a right to correct that information if it is wrong.

Allara Global will ensure it operates consistently with the California Consumer Privacy Act and only collects the personal information that is necessary for the conduct of its business, and that it will use that information in the manner for which it was intended.

7.1 Privacy

7.11 Purpose of collecting information

The purposes for which Allara Global collects personal information of Participants include satisfying legal obligations. The purposes for which Allara Global collects personal information, staff members and contractors include satisfying legal obligations, insurance purposes, and administering the individual's contract of employment.

7.12 Release of information

Allara Global must have the Participant's permission in writing with reference to the release of information. Permission shall be sought as required.

Allara Global is required to ask for the staff member's permission in writing with reference to the release of information.

7.13 Information collected

Allara Global collects personal information solely for the purpose of operating Certificate Programs under the E2659 – 18 Standard Practice for Certificate Programs accredited by the ANSI National Accreditation Board (ANAB). The requirements of the ANAB may mean the release of Participants' or staff members' personal information for the purposes of an audit.

The type of information Allara Global collects and holds includes (but is not limited to) personal information, including sensitive information. This may be, Participants and parents and/or guardians before, during and after the course of a Participant's enrolment, Allara Global staff members and contractors, and other people that come into contact with Allara Global.

The information media may take the form of interviews, feedback surveys, email correspondence, telephone calls, or Third-Party information.

Data will be uploaded to the Allara Global Customer Relationship Management System (CRM), the Allara Global Secure Share Drive, and the Allara Global and/or Learning Management System (LMS).

7.14 Provision of information

Participant, client or staff information will not be provided to anyone unless Allara Global has permission from the Participant or staff member or is specifically required to provide the information by law. For example, Participant information is only given to the following bodies where required:

- ANAB (ANSI National Accreditation Board)

While Participants are undertaking the training program, there will be times when Allara Global and/or its Customer Success Managers, Designated Authority or other members of staff may need to discuss the Participant's program with internal Allara Global staff or ANAB.

7.15 Access to information

Under the California Consumer Privacy Act, the Participant, client or staff member can access his/her personal information and may correct inaccurate or outdated information about them.

7.16 Participants and clients

Participants will have access to all their personal information held by Allara Global. Allara Global will store and use the information appropriately and limit access to only those who have a legal reason to have access to that information, or whom the Participant has given permission.

Participants who request access to their information will be given full access to the details they request. No cost will be charged for them accessing their information whilst they are enrolled Participants.

To access records, Participants must submit a request in writing to the Customer Success Team at helpdesk@allaraglobal.com.

For access to records, the Participant must meet with the Designated Authority and provide identification (such as license, passport).

7.17 Staff

Staff have access to all their personal information Allara Global holds. Allara Global will store and use the information appropriately and limit access to only those who have a legal reason to have access to that information, or whom the staff member has given permission.

Staff members who request access to their information will be given full access to the details they request. There will be no cost incurred for accessing this information.

7.18 California Consumer Privacy Principles

Allara Global abides by the California Consumer Privacy Act (CCPA) and will not pass on Participants' or other staff members' information to anyone in any way that may be considered as breaching the California consumer privacy principles.

The CCPA fact sheet can be viewed and downloaded from:

https://www.oag.ca.gov/system/files/attachments/press_releases/CCPA%20Fact%20Sheet%20%2800000002%29.pdf

7.2 Security

7.21 Assessments

Exams serve as summative assessments to evaluate overall learning outcomes and are developed with a strong emphasis on security. To ensure the integrity of these assessments, they follow established best practices in exam security. Detailed guidelines, including specific measures and protocols to protect the security of assessments, can be found in the Allara Global Instructional Design Plan Document.

7.22 Allara Global LMS

Allara Global currently uses Docebo LMS. Docebo maintains an information security management system (ISMS) and, within this framework, has defined a comprehensive information security program, including controls implemented

under ISO 27001, ISO/IEC 27017, ISO/IEC 27018, ISO/IEC 27701, and AICPA/ISAE 3000 SOC 2 managed by a dedicated security team. Our LMS is developed, maintained and operated through a Software Development Life Cycle (SDLC) and a Change Management process, including the security by design principle and the highest security and quality standards. The most recent Information Protection and Security Standards of Docebo Software can be found at trust.docebo.com.

For all supporting documents relevant to the security of the Allara Global LMS, refer to the following file on the Allara Global Share Drive:

- [Allara Global LMS Information and Security Processing Documentation \(2025\)](#)

7.23 Allara Global CRM

The Allara Global CRM outsources the hosting of its product infrastructure to Amazon Web Services (AWS), a leading cloud infrastructure provider, with data centers located in the United States, with the primary region in Virginia and the secondary region in Ohio, and the European Union, where the primary region is located in Germany and the secondary in Ireland.

Allara Global places reliance on AWS's audited security and compliance programs for the efficacy of their physical, environmental, and infrastructure security controls. AWS guarantees between 99.95% and 100% service availability, ensuring redundancy to all power, network, and HVAC services. The business continuity and disaster recovery plans for the AWS services used by Allara Global have been independently validated as part of AWS's SOC 2 Type 2 report and ISO 27001 certification.

AWS's compliance documentation and audit reports are publicly available at the AWS Cloud Compliance Page and the AWS Artifacts Portal located at:

<https://aws.amazon.com/compliance/data-center/controls/>

7.24 Allara Global Share Drive

Allara Global currently uses SharePoint. For more information regarding the security of the Allara Global Share Drive and Administration technologies, please visit the Microsoft website for compliance and assurance details:

<https://learn.microsoft.com/en-us/compliance/assurance/assurance-encryption-for-microsoft-365-services>

(8) Program commercial support and disclosure

Allara Global does not accept commercial support of its Certificate program activities if such acceptance would, or would appear to:

- Create an atmosphere limiting the free exchange of ideas and information; or
- Introduce bias or otherwise threaten objectivity; or
- Create a conflict of interest.

When funding is accepted from external sources, that funding will be disclosed on program promotional materials and the website.

At this time, Allara Global does not receive commercial support, including financial or in-kind contributions to the Certificate program itself or to the Certificate issuer. If, in the future, commercial support was accepted, all stakeholders must be informed of said support.

(9) Fees, cancellation, and refunds

In accordance with the ASTM Standard E2659 – 18, Allara Global will ensure that:

1. Fees paid by Participants and clients in advance of course commencement are protected.
2. A fair and reasonable refund policy is provided to all Participants.

9.1 Provision of information

Allara Global provides Participants and clients with information relating to fees, charges and refunds prior to enrolment. Prior to enrolment of a Participant into an Allara Global course and/or training program or fee for service, Allara Global provides the following fee information to each Participant, client and/or Stakeholder:

- The total amount of all fees including:
 - Course and enrolment fees;
 - Any other charges.
- Payment terms, including:
 - The timing of payments
 - The amount of fees to be paid for each payment; and
 - Any non-refundable deposit/enrolment fee.
- The nature of the guarantee given by Allara Global to complete the training and/or assessment once the Participant has commenced study in their chosen qualification or course.
- The fees and charges for additional services, including such items as:
 - Issuance of a replacement qualification; and
 - The options available to Participants who are deemed **Not Competent** on completion of training and assessment.
- Access to this Fees, charges and refunds policy via the Allara Global website www.allaraglobal.com

9.2 Payment of enrolment or course fees

9.21 Enrolment fee

An initial enrolment administration fee applies to all courses (except where the student accesses subsidized training). This and other mandatory fees will be invoiced and are payable prior to the commencement of your course. Allara Global may accept payment from each individual Participant prior to the commencement of the course for payment of:

- Enrolment fees; and
- Any other fee component that is a mandatory payment for the course.

Following course commencement, Allara Global may require payment of additional fees as per published course fees and charges.

9.22 Payment of the fee

Enrolment fees may be payable as applicable for the training product by either:

- The Participant;
- A relevant employee from the Participant company; or
- Another Stakeholder.

9.23 Collection of fees

Before enrolment, Allara Global will issue an invoice for the course fees payable. Fees must be paid in full by credit card, debit card, or electronic funds transfer in accordance with the payment details set out in the invoice.

9.24 Overdue fees

If invoiced fees have not been paid in full by the due date, Allara Global will follow up payment with the payee by:

- Contact made at **thirty (30)** days past the due date, with records of contact file noted in the Customer Relationship Management System.
- Contact made at **sixty (60)** days past the due date, with records of contact file noted in the Customer Relationship Management System.
- Contact made at **ninety (90)** days past the due date, with records of contact file noted in the Customer Relationship Management System.

If as a result of the above, Allara Global reaches the conclusion that payment of the fees is unlikely, Allara Global will then advise the payee of the consequence of non-payment of fees as set out below in 'Non-payment of fees'.

Allara Global will retain records of the emails and conversations related to the payment of fees in the Customer Relationship Management System.

9.25 Non-payment of fees

If the fees remain unpaid, Allara Global may withdraw access to the course or refuse Certification for the training provided. If Allara Global chooses to exercise this right, Allara Global will do so by providing written notice to the relevant parties.

9.26 Cooling off period

In all cases where course fees are paid in advance of the course commencement date the statutory cooling off period of **ten (10)** working days applies.

The cooling-off period is defined to be **ten (10)** working days from the course enrolment date.

9.3 Refund of fees

Course fees paid may be refunded, transferred or reallocated in the following circumstances:

- If Allara Global cancels the course for whatever reason, the Participant will receive a full refund (or pro-rata adjusted refund) less the administration fee. Allara Global may also offer the Participant a transfer to another course, where this choice is for the Participant to make.
- If the Participant has elected to pay the course fees by direct debit/recurring payments, Allara Global will cancel their direct debit, not refunding any monies paid by direct debit before the course cancellation, including the course deposit, provided Allara Global receives this cancellation request within the cooling-off period.
- If the Participant wishes to change their enrolment into another course at the course fees paid will be transferred to new course. Additional course fees may apply where the second course has a higher course price.

9.4 Non-refundable fees

Fees are non-refundable if the Participant:

- fails to comply with terms and conditions of enrolment; or
- provides false or misleading information; or
- has passed the cooling-off period.

Once training has commenced and the in the course no refund is available, unless compelling circumstances prevail, including but not limited to:

- Extreme personal hardship.
- Medical circumstances which warrant non-completion of course.

In cases of compelling circumstances, the Participant may wish to defer their studies. Payment of fees will be held until the Participant returns to studies and may be transferred to another course of study at the time of re-enrolment. A Participant that defers studies must return to studies within twelve (12) months of the commencement of the deferment period.

9.5 Refunds

In all circumstances, requests for refund due to course withdrawal or cancellation must be made in writing via the Allara Global Customer Success Team at helpdesk@allaraglobal.com, and the provision of other relevant documentary evidence (for example, medical certificate). This Customer Success Team email, helpdesk@allaraglobal.com, can be accessed on the Allara Global website and Allara Global LMS.

Approved refunds due to the Participant will be paid within **thirty (30)** days of receiving a valid written request through the Allara Global Help Desk team available at helpdesk@allaraglobal.com. For more information regarding refunds, please refer to Allara Global Policies and Procedures.

9.6 Fees protection

Allara Global warrants that it maintains appropriate retained funds in its bank account to enable continuance through to completion of the Certificate once the Participant has commenced study in their chosen qualification or course.

(10) Nondiscrimination

Allara Global will meet the needs of individuals and the community through the integration of access and equity guidelines by:

- Ensuring that access and equity principles for all people are implemented through the fair allocation of resources and the right to equality of opportunity without discrimination; and
- Increasing opportunities for people to participate in the vocational education and training system, and in associated decisions, which affect their lives; and
- Prohibiting discrimination towards any group or individual in any form, inclusive of:
 - Gender;
 - Pregnancy;
 - Race, color, nationality, ethnic or ethno-religious background;
 - Marital status;
 - Sexual orientation;
 - Age (in relation to compulsory retirement);
 - Physical or mental disability;
 - Marital status;
 - Family or carer's responsibilities;
 - Religion;
 - Political opinion; and
 - National extraction.

Allara Global will ensure that at time of enrolment or prior, participants are:

- Informed of their rights and obligations as a participant of an Allara Global course; and
- Assessed equally for entry into an Allara Global course.

10.1 Fair treatment and equal opportunity

10.11 Promoting access and equity

Allara Global actively promotes equity in access to, and participation in vocational education and training through:

- Ensuring fair treatment and equal opportunity to all existing and prospective participants through open, and fair and transparent selection procedures.
- Assessing all participants, regardless of background, circumstance or eligibility for funding, for entry to study through:
 - the same published entry requirements; and
 - the same process.
- Ensuring all participants who are eligible for funding under government programs are:
 - advised of this right upon application or interview for entry; and
 - neither advantaged nor disadvantaged by their eligibility for any program.
- Ensuring all assessments from entry to the end of the course of study is based on merit on an individual, case by case basis.
- Applying the principle of 'reasonable accommodation' in providing support for participants from equity groups. This support is provided on an individual, case by case basis.

Entry requirements, where stipulated, for each specific training product offered by Allara Global can be viewed on the Allara Global website, www.allaraglobal.com.

10.12 Refusal of entry

Applicants who are refused entry to a training product course have the right to appeal this decision through the complaints and appeals process. (See *Allara Global Policies and Procedures sections (5) Complaints and (6) Appeals*).

10.13 Minimum entry requirements for vocational educational courses

The minimum requirements for enrollment into an ANAB Certificate course is published:

- On Allara Global's website www.allaraglobal.com;
- In relevant course marketing materials; and
- In the course description for each training product course.

10.2 Enrolment standards

Participants who purchase or enroll to an Allara Global training product do so by fair and open procedures with published criteria stated clearly on the website, www.allaraglobal.com.

Allara Global's staff advise prospective Participants in a professional, and ethical and responsible manner and do not provide prospective participants with false or misleading information or advice.

(11) Personnel

The CEO has overall authority of Allara Global issued Certificates. Key personnel responsible for implementing required policies and procedures who report directly to the CEO include the Chief Operations Officer. Individuals reporting to the

Chief Operations Officer that are responsible for implementing required policies and procedures include; the Designated Authority and the Customer Success Team.

Personnel are assigned to implement Certificate program policies and procedures across departments specializing in the various activities.

11.1 Communications about and training on controlled documents

Allara Global employee policies are included in all contracts for employment and are reviewed/discussed at orientation. Each new hire receives a link to their employment contract, and they provide their digital signature, that acknowledges their agreement. Each department develops and maintains new employee training and any subsequent training as necessary to meet departmental goals.

11.2 Personnel evaluations and development plans

Annual Performance Reviews provide evidence of personnel competency/skill deficiencies. Deficiencies in performance issues are addressed through progressive disciplinary means. Professional development opportunities are discussed at Annual Performance Reviews.

Allara Global maintains confidentiality on direct evidence of performance review process.

11.3 Staff Agreements covering confidentiality, security and conflicts of interest

All Certificate program personnel will follow Allara Global's code of conduct as outlined in their employment contract or Third-Party Agreement, covering terms of confidentiality, security and conflicts of interest.

(12) Outsourcing

Allara Global will, prior to and upon entering into a Third-Party agreement:

- Review the Third-Party;
- Document the mutually agreed conditions for training and assessment;
- Provide all due diligence to monitoring their performance and progress; and

Upon entering into a Third-Party agreement, Allara Global will systematically monitor the Third-Party by:

- Reviewing documentation and records provided by the Third-Party; and
- Conducting interviews with Third-Party delegates.

12.1 Establishing a Third-Party agreement

12.11 Reputable party

Prior to entering into a Third-Party agreement, Allara Global will evaluate the potential Third-Party and ensure that it:

- Is reputable;
- Is solvent; and
- Has personnel with the skills and knowledge to undertake its obligations within the Third-Party agreement.

12.12 Written agreement

All agreements established with a Third-Party are entered into with the signing of a Third-Party agreement that will clearly define the:

- Responsibilities of each party; and
- Duration of the agreement; and
- Requirements for third parties to co-operate with the national regulator; and
- Conditions for the termination of the agreement.

All Third-Party agreements are recorded on the Allara Global Share Drive.

12.2 Third-Party monitoring

12.21 Systematic monitoring

Monitoring of Third-Parties will be undertaken through a systematic approach with regular monitoring meetings conducted throughout the course of the agreement. Allara Global will monitor all Third-Party agreements by:

- Review of documentation and records provided by the Third-Party; and
- Interviews with Third-Party delegates.

12.22 Monitoring and monitoring records

Monitoring activities will be recorded and stored on the Allara Global Share Drive.

Full reports on review findings are provided to the CEO detailing any issues or concerns with the Third-Party agreement, including but not limited to:

- The Third-Parties' overall performance; and
- Compliance with the Standard Practice for Certificate Programs, E2659 – 18; and
- The Third-Parties' ability to provide the services as defined in the agreement.

Amendments to or termination of the agreement may be made based upon report findings.

12.3 Cessation of agreements

12.31 Ending an agreement

All Third-Party agreements may be ended by a party to the agreement with the provision of **four (4)** weeks written notice.

In the creation and management of information and records Allara Global will:

- Ensure all staff employed by Allara Global responsible for the maintenance of information and records are conversant with its privacy and personal information policy and procedure developed to meet with regulations set out in the California Consumer Privacy Act.
- Comply with all state or territory regulatory requirements for the implementation of a Unique Identifier within all Participant records.
- Maintain all Participant records on the Allara Global Customer Relationship Management System and/or Allara Global LMS.
- Provide reports of its Participant records, attainment of Certificates and qualifications to its registering body on a regular basis, as determined by the registering body.
- Only release information and records held on file to third parties where consent has been provided in written format and in accordance with the privacy and personal information policy.

(13) Records control

13.1 Records management procedures

In the management of information and data records of Allara Global clients, Participants and Stakeholders, the CEO will ensure any other staff carrying out business operational procedures is conversant with and informed of:

- This Records Management Policy and Procedure; and
- The Privacy and Personal Information Policy.
- The applicable state or territory legislation and regulations including:
 - the California Consumer Privacy Act.
 - the Standard Practice for Certificate Programs, E2659 – 18.

Allara Global staff will comply with all external reporting responsibilities where required to do so.

13.2 Records access

Only personnel directly involved with Participant's welfare and or Participant's results will have access to personal Participant details.

Only upon receipt of written consent by a Participant can staff provide a third-party with a Participant's personal details.

Upon reasonable request and notice, Customer Success Team shall provide a Participant with access to their personal Participant records and reissue Certificates achieved.

Access to Participant records may be provided where ANAB or an officer of the law require Allara Global to do so.

13.3 Records management

At the completion of the Participant data entry process:

1. Participant personal details (name and email) will be automatically stored in the Allara Global LMS and Customer Relationship Management System
2. Participant completion Certificate will be automatically stored in the Allara Global LMS
3. Upon receipt of a request to change details (name or email) the Allara Global staff member will:
 - Update the client, Participant or Stakeholder records in the Allara Global Customer Relationship Management System and the Allara Global LMS.

13.4 Records storage

Designated staff shall ensure that all Participant records are maintained in an accurate manner, providing for the safekeeping of all Participant assessment results for a term no less than **five (5)** years.

Examinee records (Certificates, exam scores, answer sheets) are stored in the Allara Global LMS and on a backup server. Examinee Certificates, exam scores and answer sheets are only accessible to the Customer Success Team that need the records for their job.

Participant records shall be stored:

- Electronically in the Allara Global Customer Relationship Management System, where applicable.
- Electronically in the Allara Global Learning Management System, where applicable.
- A copy of all Participant records stored in the LMS may only be archived following the Certificate expiry date.

13.5 Records retention and disposal

Allara Global has developed record retention and disposal standards in accordance with accreditation standards, along with applicable state and federal laws. This record retention and disposal standard will ensure that Certificate program records are identified, managed, and disposed of in a manner designed to ensure integrity of our Certificate program quality management system and the confidentiality and security of our information.

Records will be kept according to the following schedule:

Record	Timeframe for Retention/Disposal	Location	Responsible Individual(s)	Disposal Instructions (if applicable)
Student/Examinee Records	Minimum of 5 years- currently maintained Allara Global	Allara Global LMS and in some cases the Allara Global Customer Management System	Customer Success Manager	Archived on the Allara Global LMS
Certificate Records	Minimum of 5 years- currently maintained Allara Global	Allara Global LMS	Customer Success Manager	Archived on the Allara Global LMS
Exam Records	Minimum of 5 years- currently maintained	Allara Global LMS	Customer Success Manager	Archived on the Allara Global LMS

Examinee records (Certificates, exam scores, answer sheets) are stored in the Allara Global LMS. Examinee Certificates, exam scores and answer sheets are only accessible to specific departments within the Customer Success Team that need the records for their job, such as customer service.

(14) Document control

Certificate Program controlled documents are distributed to all relevant Certificate Program staff (i.e. those involved in creating and revising specific documents) upon hiring and are maintained on the Allara Global Share Drive. Obsolete versions of documents are archived in the specific folder housing the controlled documents so that only the most current version of the document is available.

Additionally, (re-)approval is only required when policies are changed or when new policies are added. When content is added or edited to provide additional detail or clarify a minor issue, no (re-)approval is needed. Upon approval of any newly created or revised controlled document, the version date is updated in the master list below.

14.1 Master list of controlled documents

Document	Version Date	Created & Revised	Approved & Re-Approved
Allara Global Food Handlers Certificate Training Program Management Plan	(05 Apr 2025)	(Oct 2024) (05 Apr 2025)	(07 Apr 2025)
Allara Global Instructional Design Plan	(05 Apr 2025)	(Oct 2024) (05 Apr 2025)	(07 Apr 2025)
Allara Global Policies and Procedures Document	(05 Apr 2025)	(Oct 2024) (05 Apr 2025)	(07 Apr 2025)

14.2 Exam development program document control

Creation and revision of documents is tasked to the Designated Authority. The person with overall authority for approval and re-approval of program documents pertaining to Exam Development is the Head of Instruction Design.

Document control occurs with the Chief Operating Officer. Changes to documentation are communicated to other departments only as needed and documents are securely stored on the organization's internal server for internal use.

Old versions of documents are archived and/or deleted to prevent the use of obsolete documents.

14.3 Learning and development program document control

The person with overall authority for approval and re-approval of program documents pertaining to Learning & Development is the Head of Instructional Design. The Designated Authority tracks changes and ensures team members follow the document control process for individual projects, while the Head of Instructional Design oversees and manages processes.

Team members are tasked with creating and revising program documents as needed to update and maintain the course curriculum.

14.4 Version control

Version control is maintained using the following procedures:

- **Semantic versioning:** All updates shall be designated in the footer using the MAJOR.MINOR.PATCH format.
- **File naming conventions:** Files must follow the naming convention "Item - Version (DD MMM YYYY)".
- **Document reviews:** Regular reviews will occur every January and July, and in response to regulatory changes.
- **Incorporating feedback:** Comments and tracked changes will be used to integrate feedback from the Advisory Group and Management Team.

(15) Internal audit

Allara Global is committed to continuously improving all aspects of its operations with the aim of delivering the best possible services to achieve quality outcomes.

Allara Global monitors and reviews its training and assessment services, operations, and all policies and procedures systematically through the evaluation of delivery performance data and client.

Allara Global achieves this through Internal Audit procedures.

15.1 Internal Audit steps

Internal Audits are performed on an annual basis and follow a four-step process lasting 3-5 weeks. The steps for internal audit are outlined as follows.

1. Select internal auditor(s) to conduct audit – (1 Week)
 - Qualified Internal Auditors are internal employees with experience performing detailed analysis of Certificate program policies and procedures and able to communicate effectively without direct supervision. Internal Auditors will never audit their own department.
 - Internal auditor(s) are chosen by the Chief Education Officer and approved by the CEO.
 - Qualified External Auditors are Third-Party Consultants with experience performing detailed analysis of Certificate program policies and procedures.
2. Auditor(s) are briefed regarding Certificate program policies and Internal Audit process – (1 Day)
3. Auditor(s) audit Certificate program policies, verifying implementation of policies through departmental procedures – (2 – 4 Weeks)
4. Auditor(s) create audit report to present to Management Review Team per Management Review Process outlined below.

15.2 Internal Audit schedule

Allara Global will maintain an Internal Audit schedule to systematically review all its services, policies, procedures and operations with the schedule to include:

- Internal Audit activities to be undertaken in the calendar year.
- Persons involved in the Internal Audit activity.
- Timeframes for completion of the Internal Audit activity.

15.3 Identification of Internal Audit needs

To identify improvements required within the policies, procedures and services provided, Allara Global will review all policies and procedures annually and provide evidence of implementation.

15.4 Informed personnel

In the implementation and conduct of Internal Audits within Allara Global, the CEO will ensure the staff carrying out an Internal Audit is conversant with and informed of:

- The policy and procedures for conducting Internal Audits across Allara Global scale of operations; and
- The policies and procedures relevant to the Internal Audit; and
- The state or territory regulations relevant to the Internal Audit; and
- The Standard Practice for Certificate Accreditation Programs, E2659-18.

Prior to conducting the internal audit, the Designated Authority will by way of email:

- Notify personnel required to participate in the Internal Audit; and
- Provide details of the audit including:
 - The Internal Audit purpose and scope.
 - Timeframe for Internal Audit completion.
 - Reporting requirements.

15.5 Internal Audit conduct and standards

The Internal Audit team will ensure the Internal Audit:

- Is conducted against the Standard Practice for Certificate Accreditation Programs, E2659-18; and
- Is conducted against the state and territory contract regulations (as applicable); and
- Will apply to all Allara Global services, training delivery and assessment within its scope of ANAB accreditation.

15.6 Audit outcomes and reporting

At the completion of the internal audit the Designated Authority is to:

- Provide the CEO with a full report identifying non-compliance issues.
- Table the report at the next management meeting for review of all non-compliance issues.
- Create an itemized Corrective and Preventative Action Plan to address non-compliances identifying:
 - The rectification / improvement required.
 - The timeframe for completion of the rectification process.
 - Person/s responsible for carrying out the rectification.

15.7 Corrective and preventive action plan

Corrective and preventive actions are decided upon at the Management Review Meeting as part of the annual Internal Audit process. New actions will be added to the list as needed throughout the year while completed/canceled actions are removed after the annual meeting.

The process of deciding on the corrective and preventive actions consists of the Management Review Team:

1. Identifying current or potential issues after reviewing the results of the program evaluation.
2. Creating plans for corrective and/or preventive actions to address the issues identified.
3. Designative specific departments/individuals to complete each specific action by feasible due dates.

The Management Review Team will maintain a list of corrective and/or preventive actions and will follow up on outstanding actions to track their progress and completion throughout the year. Actions will remain on the list until they have been completed and reviewed at the annual management review meeting.

The list will consist of the following details of each action:

1. Description of specific actions;
2. Departments/Individuals responsible;
3. Type of action (corrective or preventive);
4. Target Due Date;
5. Updates/Comments Section;

(16) Management review

A management review shall be conducted to ensure our quality management system's continuing suitability, adequacy, and effectiveness.

The Management Review Team meets annually for the management review of Allara Global ANAB Certificate programs. The Management Review Team is a group consisting of the leaders of the departments audited, and/or other department members chosen by the department leader.

The Internal Audit report, the Pilot Participant results, Program Evaluation documentation and the Certificate Program Instructional Design Plan for all programs are submitted to the members of the Management Review Team prior to the Management Review Meeting. Each member is asked to review prior to the meeting all documentation to assist discussion at the Meeting, as well as review each Certificate Program Instructional Design Plan for potential revisions.

The Management Review Team consists of the review and discussion of the following items:

1. Results of the Internal Audit
2. Status of corrective and preventive actions
3. Results of Third-Party performance monitoring
4. Results of program evaluation
5. Review of complaints received
6. Review of appeals received
7. Follow-up actions from previous management reviews

The Management Review Team notes and discusses any potential opportunities for continuous improvement, deficiencies or potential future issues as noted in review of the elements of the Internal Audit and program evaluation results listed above. To address any potential opportunities for continuous improvement, deficiencies or potential future issues, the Management Review Team determines corrective and/or preventive actions related to:

1. Improvement of the management system
2. Improvement of the Certificate program activities
3. Resource needs

After the adjournment of the meeting, the Instructional Design team will finalize edits to the Certificate Program Instructional Design Plans and prepare the meeting minutes, which include the corrective/preventative actions decided on by the team. A copy of the meeting minutes is sent to each member with any changes noted by a member integrated with the document.