



# REPORT

## **Audit report: AUSTRALIAN TRAINING ACADEMY PTY. LTD.**

RTO number:	0686
CRICOS number:	N/A
Date/s of audit:	16 Jan 2020
Date report created:	7 February 2020
Date report updated:	1/04/2020

## Organisation details

Organisation's legal name:	AUSTRALIAN TRAINING ACADEMY PTY. LTD.
Trading name/s:	Australian Training Academy Pty Ltd
RTO number:	0686
CRICOS number:	N/A

## Audit team

Lead auditor:	Andrea Masters
Auditor/s:	N/A

## Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0010096
Audit reason/s:	Compliance Monitoring
Address of site/s visited:	4049 PACIFIC HWY Loganholme QLD 4129 Australia
Date/s of audit:	16 Jan 2020
Organisation's contact for audit:	Vincent Spreadborough Chief Executive Officer admin@ata.qld.edu.au 732096000

## Original finding at time of audit

### Audit finding: Critical non-compliance

Report completed by: Andrea Masters

Practice	Standards for RTOs	Finding
Training and Assessment	1.1*, 1.2*, 1.3*, 1.8*, 1.13, 1.14, 1.15, 1.16	Not compliant
Marketing/Recruitment Practices	4.1	Compliant
Enrolment	5.1*, 5.2*, 5.3*	Not compliant
Support and Progression	1.7*	Not compliant
Completion	3.1*	Not compliant

\*Indicates a non-compliant clause

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 24/03/2020: Critical non-compliance

Report completed by: Andrea Masters

Practice	Standards for RTOs	Finding
Training and Assessment	1.1*, 1.2*, 1.3*, 1.8*	Not compliant
Enrolment	5.1*, 5.2*, 5.3*	Not compliant
Support and Progression	1.7*	Not compliant
Completion	3.1*	Not compliant

\*Indicates a non-compliant clause

## Background

Summary of organisation and management structure:

The CEO of the organisation is Mr Vincent Spreadborough, who has been the CEO of the business since December 2016, when his father retired. His father set up the business around 1970 and is part of a wider enterprise which also comprises two further businesses, which he and his brother now run. One is a security business (10-15 staff) and a debt collection agency. All three businesses currently operate out of the same premises at 4049 Pacific Highway, Loganholme.

The training business became an RTO in 1998 and currently enrolls around 10 students per week. However, Vincent is seeking to grow this, via an increase in marketing and partnerships with employment agencies. He also seeks to move into Certificate III and IV Business courses and some fire related qualifications, given Anthony Holt's experience in this field. Anthony has been with the organisation as a trainer and assessor of vet qualifications since 2014.

Scope of organisation's registration:

30864QLD	Course in Implement Traffic Guidance Schemes
CPP20207	Certificate II in Security Operations
CPP20211	Certificate II in Security Operations
CPP20212	Certificate II in Security Operations
CPP30407	Certificate III in Security Operations
CPP30411	Certificate III in Security Operations
CPP30607	Certificate III in Investigative Services
HLTAID001	Provide cardiopulmonary resuscitation
HLTAID002	Provide basic emergency life support
HLTAID003	Provide first aid
HLTAID004	Provide an emergency first aid response in an education and care setting
RIOHS205A	Control traffic with stop-slow bat
RIIWHS205D	Control traffic with stop-slow bat
RIIWHS302D	Implement traffic management plan
UETTDRRF06B	Perform rescue from a live LV panel

UETDRRF06	Perform rescue from a live LV panel
CPP30619	Certificate III in Investigative Services
CPP31318	Certificate III in Security Operations
CPP20218	Certificate II in Security Operations
HLTAID005	Provide first aid in remote situations
HLTAID006	Provide advanced first aid
HLTAID007	Provide advanced resuscitation
HLTAID008	Manage first aid services and resources
SITHFAB002	Provide responsible service of alcohol
SITHGAM002	Attend gaming machines
PUAFER001	Identify, prevent and report potential facility emergency situations
PUAFER002	Ensure facility emergency prevention procedures, systems and processes are implemented
PUAFER003	Manage and monitor facility emergency procedures, equipment and other resources
PUAFER004	Respond to facility emergencies
PUAFER005	Operate as part of an emergency control organisation
PUAFER006	Lead an emergency control organisation
PUAFER007	Manage an emergency control organisation
PUAFER008	Confine small emergencies in a facility

Suburb and state of all delivery sites:

- 4049 Pacific Hwy, Loganholme

Third party usage:

- Nil

Core clients/target groups:

Unskilled workers moving into security and currently employed workers requiring refresher courses.

Training Revenue (Funded or fee for service):

- Fee for services and funded, via Certificate 3 guarantee

Total number of current enrolments in the organisation as at audit date:

10 (one outside of scope)

In preparing the audit report, consideration has been given and reference made, where relevant, to:

- Information provided by students as part of a student survey or interview.
- Information provided directly by AUSTRALIAN TRAINING ACADEMY PTY. LTD. to ASQA.
- Existing information and records held by ASQA concerning AUSTRALIAN TRAINING ACADEMY PTY. LTD..
- Information provided to ASQA's auditors and documentation reviewed during the site audit of AUSTRALIAN TRAINING ACADEMY PTY. LTD. conducted on 16 Jan 2020 - 16 Jan 2020.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>CPP20212 Certificate II in Security Operations</i>	Mixed	1
<i>CPP30411 Certificate III in Security Operations</i>	Mixed	6
<i>HLTAID003 Provide first aid</i>	Face to Face	2
<i>HLTAID004 Provide an emergency first aid response in an education and care setting</i>	Mixed	0
<i>CPP20218 Certificate II in Security Operations</i>	Mixed	0
<i>CPP31318 Certificate III in Security Operations</i>	Mixed	0

\*Apprenticeship, Traineeship, Face to face, Distance, Online, Workplace, Mixed, Other (specify)

## Interviewees

Name	Position	Training products
Mr Vincent Spreadborough	CEO	N/A
Mr Anthony Holt	Trainer and Assessor	All training products on scope
Ms Chloe Clarke	Administrator	N/A

## About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs). If non-compliance has been identified, this report describes evidence of the non-compliance.

Where non-compliance has been identified, the Registered Training Organisation is accountable for identifying and correcting non-compliant practices and behaviours, particularly those that have had a negative impact on learners.

Correcting a non-compliance may require:

- correcting a process or system that has led to the non-compliance, and implementing a revised process or system
- identifying the impact on learners and carrying out remedial action for current and past learners

## Original action required by Organisation

AUSTRALIAN TRAINING ACADEMY PTY. LTD. did not meet all requirements for clauses Standards for RTOs: 1.1, 1.2, 1.3, 1.7, 1.8, 3.1, 5.1, 5.2, 5.3

Remedial action is required for the following training products:

*CPP20212 Certificate II in Security Operations*  
*CPP30411 Certificate III in Security Operations*  
*HLTAID003 Provide first aid*

*The organisation is required to provide evidence that demonstrates:*

### **Training and assessment**

- the organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided (Clauses 1.1 & 1.2)
- the organisation now has sufficient resources to comply with Standards for RTOs Clause 1.3 proportionate to the number of students enrolled at any time, the mode of delivery, location of delivery, and the strategies for training and assessment
- the organisation has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
  - demonstrate the organisation will implement an assessment system that ensures assessment:
    - complies with the assessment requirements of the relevant training products
    - will be conducted in accordance with the Principles of Assessment and Rules of evidence.
- the organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students across all scope items that were impacted by training and assessment practices that did not meet the requirements of the training product (including amount of training). Remedial action needs to cover current students and students who enrolled or completed with your organisation in the past six months.

### **Support and progression**

- the organisation now has appropriate systems that are followed to ensure learners with support needs are provided with support services that complies with Standards for RTOs Clauses 1.7.

### **Completion**

- the organisation now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course (Clause 3.1).
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students that completed HLTFA311A, that were issued with AQF certification documentation and were not assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course. Remedial action needs to cover students issued with AQF certification in the past six months.

### **Enrolment**

- the organisation now has appropriate systems that are followed to ensure new learners are enrolled into an appropriate training product, considering their existing knowledge, experience and skills that complies with Standards for RTOs Clause 5.1.
- the organisation now has appropriate systems that are followed to ensure each learner is provided with accurate information to enable them to make an informed decision about undertaking training with your organisation that complies with Standards for RTOs clauses 5.2 and 5.3.

## Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by AUSTRALIAN TRAINING ACADEMY PTY. LTD. on 24/03/2020, the organisation:

- remains not compliant with:  
Standards for RTOs:
  - 1.1
  - 1.2
  - 1.3
  - 1.7
  - 1.8
  - 3.1
  - 5.1
  - 5.2
  - 5.3

Refer to analysis of additional evidence detailed under each clause in this report for further information.

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

*Original Finding: Not compliant*

*Finding following additional evidence: Not compliant*

The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

##### Standards for RTOs Clause 1.2

*Original Finding: Not compliant*

*Finding following additional evidence: Not compliant*

For the purposes of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to:

- the existing skills, knowledge and the experience of the learner;
- the mode of delivery; and
- where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

- The following evidence was reviewed:
  - CPP20212 Training & Assessment Strategy ATA.pdf
  - CPP20218 Training & Assessment Strategy ATA.pdf
  - CPP30411 Training & Assessment Strategy ATA.pdf
  - HLTAID003 TAS Dec 19V1.0.pdf
  - HLTAID004 TAS Dec 19V1.0.pdf

- The documented training and assessment strategies for delivery of the above training products are not consistent with the organisation's demonstrated practice. As example and not limited to:
- For the *CPP20212 Certificate II in Security Operations* and *CPP20218 Certificate II in Security Operations*, the relevant strategies stated the following amount of training:
  - 9 weeks, comprising
    - Week 1 – 40 hours pre-reading
    - Weeks 2-9 – Trainer led training and assessment. Face to face x 9hrs x 2 days
    - Weeks 2-9 – Study and Research - Face to face x 9hrs x 2 days
    - Weeks 2-9 – Self paced – 10 hours of uninterrupted study and research per week in own time
  - 480 hours, comprising
 

123	Face to Face, trainer-led training
14	Practical Assessment
7	Underpinning Knowledge Assessment
80	Case Scenario Assessment
136	Research and study
120	Self-paced Study
- The enrolment confirmation letter advises the learner that completed modules (which may include multiple units of competency where delivered in a cluster) can be dropped off, emailed or posted to Australian Training Academy's office for marking, and that once all modules (6) are successfully completed, the learner will be advised of the appropriate practical days. The cover sheets of students' records reviewed were noted to include 'class' dates for each module. However, the trainer advised that no classes occur due to the low number of students enrolled at any one time. Only one-on-one sessions are provided. From the review of the class dates, in most cases, they were found to be the same date as the relevant assessments were marked. As the organisation does not run structured classes, it is not evident whether students receive all of the 123 hours of face to face trainer-led training, as detailed in the strategy.

It was also established during the audit, that the organisation had no training and assessment strategies in place for delivery of *CPP31318 Certificate in Security Operations*.

#### *Analysis of additional evidence*

*CPP20212 Certificate II in Security Operations*

*CPP30411 Certificate III in Security Operations*

*HLTAID003 Provide first aid*

*HLTAID004 Provide an emergency first aid response in an education and care setting*

*CPP20218 Certificate II in Security Operations*

*CPP31318 Certificate III in Security Operations*

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - In its response of 24 March 2020, the organisation confirmed that the systems and processes that were in place at the time of audit to ensure compliance failed to identify non-compliance in the RTO's practices, including those of the trainer and assessor.
  - The organisation advised that it has disciplined the relevant person and directed them to familiarise themselves with the organisation's policies and procedures. Furthermore, that additional mechanisms, comprising the following policies and procedures, checklists and templates, have or will soon be put in place to mitigate future non-compliance, as follows:
    - *Pre-enrolment policy and procedures*



- *Pre-enrolment checklist*
  - *Pre-enrolment interview and questionnaire*
  - *Individual learners plan template*
  - *Enrolment policies and procedures*
  - *Volume of learning questionnaire*
  - *Enrolment checklist*
  - *RTO Management software operating processes and procedures*
  - *Refund Policy*
  - *Assessment checklist*
  - *Internal RTO Managers Audit template*
  - *Trainer delivery review template*
  - *Internal Assessor/assessment review and Audit template*
  - *Student Class Dates/Schedule template*
  - *Attendance register*
- However, none of the above documents, or revised Training and Assessment Strategy documents reflecting these changes to practice, were provided for review. Therefore, it is not evident that the stated mechanisms in the organisation's response will remedy the organisation's systems and processes to ensure that the identified non-compliances will not recur.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage
  - The organisation still has not provided a documented Training and Assessment Strategy for CPP31318 Certificate in Security Operations, which was added to its scope of registration on 15 October 2019.

### Standards for RTOs Clause 1.3

**Original Finding: *Not compliant***

**Finding following additional evidence: *Not compliant***

**The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:**

- a) trainers and assessors to deliver the training and assessment;**
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;**
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and**
- d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.**

- The organisation has *CPP31318 Certificate III in Security Operations* on its scope of registration. However, at audit the organisation did not hold any learning and assessment resources for this qualification when asked during the audit. The trainer and assessor later advised the organisation had purchased them that same day.

#### *Analysis of additional evidence*

#### *CPP31318 Certificate III in Security Operations*

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf

- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - Although the organisation advised it had purchased the learning and assessment resources for *CPP31318 Certificate III in Security Operations* during the audit and stated it is now in possession of them in its response, no supporting evidence has been provided for review, such as copies of the tools, or a purchase receipt. Therefore, it cannot be confirmed that the organisation has addressed the non-compliance for future students.

## Standards for RTOs Clause 1.8

**Original Finding: *Not compliant***

**Finding following additional evidence: *Not compliant***

**The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):**

- a) complies with the assessment requirements of the relevant training package or VET accredited course; and**
- b) is conducted in accordance with the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2.**

Table 1.8.1 Principles of Assessment

Fairness	The individual learner's needs are considered in the assessment process. Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.  The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.
Flexibility	Assessment is flexible to the individual learner by: <ol style="list-style-type: none"> <li>1. reflecting the learner's needs;</li> <li>2. assessing competencies held by the learner no matter how or where they have been acquired; and</li> <li>3. drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.</li> </ol>
Validity	Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner. Validity requires: <ol style="list-style-type: none"> <li>1. assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance;</li> <li>2. assessment of knowledge and skills is integrated with their practical application;</li> <li>3. assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and</li> <li>4. judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.</li> </ol>
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.

Table 1.8.2 Rules of Evidence

Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.

Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

**CPP20212 Certificate II in Security Operations**

**CPP30411 Certificate III in Security Operations**

**HLTAID003 Provide first aid**

**HLTAID004 Provide an emergency first aid response in an education and care setting**

**CPP20218 Certificate II in Security Operations**

**CPP31318 Certificate III in Security Operations**

*CPP20212 Certificate II in Security Operations*

- The following evidence was reviewed:
  - Assessment tools for:
    - *CPPSEC2003B Work effectively in the security industry and*
    - *CPPSEC2012A Monitor and control individual and crowd behaviour*
      - *Underpinning Knowledge*
      - *Case Scenario*
      - *Practical Assessment*
      - *Marking Guides*
  - Completed student assessment items
    - M Ash
    - C Pritchard
    - P Weir
    - S Flynn – did not complete units/finish course

Note: P Weir was the only student to have completed CPPSEC2003B within the past 12 months. M Ash and C Pritchard were noted to have completed unit CPPSEC2012 within CPP30411, rather than CPP20212.

*CPP20218 Certificate II in Security Operations*

- The following evidence was reviewed:
  - Master Assessment tools for:
    - *CPPSEC2102 Apply legal and procedural regulations to work effectively within a security team (supersedes and not equivalent to CPPSEC2003B and CPPSEC2003A previously). and*
    - *CPPSEC2110 Monitor and control individual and crowd behaviour to main security*
      - *Underpinning Knowledge*
      - *Case Scenario*
      - *Practical 1*
      - *Practical 2*
      - *Marking Guides*
      - *Mapping*

*CPP30411 Certificate II in Security Operations – via clustered delivery*

- The following evidence was reviewed:

- Assessment tools for:
  - *CPPSEC3002A Manage conflict through negotiation*
  - *CPPSEC3005A Prepare and resent security documentation and reports*
    - Underpinning Knowledge
    - Case Scenario
    - Practical
    - Marking Guides
- Completed student assessment items
  - J Horne
  - C Pritchard
  - S Tank
  - F Rodrigues – did not complete units/finish course

#### *CPP31318 Certificate III in Security Operations*

- Master Assessment tools for:
  - *CPPSEC3103 Determine and implement response to security risk situation and*
  - *CPPSEC3106 Gather, organise and present security information and documentation*
    - Underpinning Knowledge
    - Case Scenario
    - Practical 1
    - Practical 2
    - Practical 3
    - Marking Guides

*HLTAID003 Provide first aid and*

*HLTFA311A Apply first aid*

*HLTAID004 Provide an emergency first aid response in an education and care setting*

- Assessment tools for:
  - Workbook
  - Practical observation Checklist
  - Mapping document regarding units HLTAID003 and HLTFA311A
- Completed student assessment items
  - W Nicholson
  - D Burin
  - V Naumoska
- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and/or implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
  - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
  - that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.

#### *CPP20212 Certificate II in Security Operations*

- *CPPSEC2003B Work effectively in the security industry and*
- *CPPSEC2012A Monitor and control individual and crowd behaviour*
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements

of the training product and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:

- M Ash
- C Pritchard\*
- P Weir

*\* Determined to have completed this unit within CPP30411, rather than CPP20212*

- *Demonstrated Practice*

The practical assessments comprised scenario role plays, where the assessor is required to indicate in the relevant field whether the student has attained satisfactory (S) or not yet satisfactory (NYS) regarding performance of stated tasks. A further field is included for the assessor to indicate how the professional judgement was made. In the student records viewed, the assessment in most occasions was blank apart from signatories and dates on the assessment outcome sheet. Of note, no completed practical assessment was located for CPPSEC2012A for M Ash, and the trainer and assessor was unable to provide a reason for its absence

Furthermore, the associated marking guide advises the assessor to record the students' demonstrated actions against the benchmarks required, using a tick that it has been met. However, this was not undertaken for any of the students whose records were reviewed. When queried about this process, the trainer and assessor advised he does not do this, rather he notes key words only.

The student files were noted to include a cover sheet, which provides fields to record the dates of the class for the practical assessments for each module completed. The modules can include several units of competency if the delivery is clustered. The enrolment confirmation letter advises students that completed modules can be posted, emailed or dropped off at the RTO's premises. Furthermore, that the trainer will mark their work and advise them of their progress, and once all the modules are successfully completed, they will be advised of the appropriate practical training days.

In the majority of student files viewed, the assessment dates were noted to be the same as the class dates. As example, C Pritchard was stated to have completed the first three modules (6 units in total), all on 27 May 2019. This practice does not align with the relevant training and assessment strategy, which indicates the first 6 units are delivered within the first 3 weeks and amount to a total of 37 hours of trainer-led training and assessment for this period. Therefore, it is not evident from the organisation's demonstrated practice that the organisation conducted adequate assessment of students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence.

- *Assessment Conditions:*

The trainer and assessor advised that due to the low enrolment numbers, practical training and assessment is usually undertaken on a one-on-one basis. When queried how the organisation meets the roles for the simulation for practical assessment, the trainer and assessor advised he usually uses the receptionist and whoever else may be in the office at the time. Therefore, it is not evident that the organisation has a sufficient mechanism in place to ensure it meets the simulated environment as stated in the assessment conditions of the relevant units of competency.

*CPP20218 Certificate II in Security Operations – not clustered*

- *CPPSEC2102 Apply legal and procedural regulations to work effectively within a security team*
- *CPPSEC2110 Monitor and control individual and crowd behaviour to maintain security*

The assessment conditions for the above units state 'The assessment of performance evidence must be done by direct observation of the learner by the assessor, either by an assessor observing the learner physically or by an assessor observing the learner via audio and visual media. Furthermore, assessment of performance evidence is only valid where the learner has been assessed performing the role of a security officer.

Given the non-compliances identified in the organisation's demonstrated practice for the superseded qualification, CPP20212, it is not evident how the organisation will meet the requirements of the Standards, including the assessment conditions for CPP20218.

#### *CPP30411 Certificate II in Security Operations – clustered delivery*

- *CPPSEC3002A Manage conflict through negotiation*
- *CPPSEC3005A Prepare and present security documentation and reports*
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
  - J Horne
  - C Pritchard – (file noted to include a written report for CPPSEC3005A)
  - S Tank

- *Demonstrated Practice*

The practical assessments comprised scenario role plays, where the assessor is required to indicate in the relevant field whether the student has attained satisfactory (S) or not yet satisfactory (NYS) performance regarding stated tasks. There is a further field for the assessor to indicate how the professional judgement was made. In the student records viewed, the assessment in most occasions was blank apart from signatories and dates on the assessment outcome sheet.

Furthermore, the associated marking guide advises the assessor to record the students' demonstrated actions against the benchmarks required, using a tick that it has been met. However, this was not undertaken for any of the students whose records were reviewed. When queried about this process, the trainer and assessor advised he does not do this, rather notes key words only.

- *Assessment Conditions:*

The trainer and assessor advised that due to the low enrolment numbers, practical training and assessment is usually undertaken on a one-on-one basis. When queried how the organisation meets the roles for the simulation for practical assessment, the trainer and assessor advised he usually uses the receptionist and whoever else may be in the office at the time. Therefore, it is not evident that the organisation has a sufficient mechanism in place to ensure it meets the simulated environment as stated in the assessment conditions of the relevant units of competency.

#### *CPP31318 Certificate III in Security Operations*

- *CPPSEC3103 Determine and implement response to security risk situation*
- *CPPSEC3106 Gather, organise and present security information and documentation*

The assessment conditions for the above units state 'The assessment of performance evidence must be done by direct observation of the learner by the assessor, either by an assessor observing the learner physically or by an assessor observing the learner via audio and visual media. Furthermore, assessment of performance evidence is only valid where the learner has been assessed performing the role of a security officer.

Given the non-compliances identified in the organisation's demonstrated practice for the superseded qualification, CPP30411, it is not evident how the organisation will meet the requirements of the Standards, including the assessment conditions for CPP31318.

*HLTAID003 Provide first aid*

*HLTAID004 Provide an emergency first aid response in an education and care setting*

*HLTFA311A Apply First Aid*

- *Validity and Sufficiency - the assessment tools do not address all unit of competency requirements. For example, but not limited to:*
  - **Performance Evidence:**  
Unit of competency for HLTAID003 includes performance evidence 'provided an accurate verbal or written report of the incident'. However, the observation checklist for HLTAID003 did not identify whether the learners had provided a written or verbal report. Furthermore, there was no evidence of a completed written incident report within all students records reviewed. Therefore, it is not evident how the assessor made a judgement of competency, given no details of the verbal report were captured by the assessor during the learners' application of practical skills to determine if the report was accurate. This performance evidence is also a requirement for HLTAID004.

The organisation does not deliver HLTFA311A, only HLTAID003. It advised that it undertook a mapping exercise to compare the two units and determined that all requirements of HLTFA311A are encompassed in HLTAID003.

#### *Analysis of additional evidence*

*CPP20212 Certificate II in Security Operations*

*CPP30411 Certificate III in Security Operations*

*HLTAID003 Provide first aid*

*HLTAID004 Provide an emergency first aid response in an education and care setting*

*CPP20218 Certificate II in Security Operations*

*CPP31318 Certificate III in Security Operations*

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - In its response of 24 March 2020, the organisation confirmed deficiencies in its assessment system and advised that all assessments will now be:
    - overseen by the CEO
    - peer reviewed
    - randomly audited by a third party RTO.
  - The organisation also advised that a number of procedural documents had been or soon will be developed to rectify the identified non-compliances. Those relevant to assessment appear to be:
    - *Assessment checklist*
    - *Internal RTO Managers Audit template*
    - *Trainer delivery review template*
    - *Internal Assessor/assessment review and Audit template*
    - *Student Class Dates/Schedule template*
    - *Attendance register*

- However, none of the above documents were provided with its response. Furthermore, insufficient detail was provided about the random audit of assessments, such as the process that will occur and the identity of the third party RTO that will undertake the audits.
- Therefore, it is not evident that the organisation will conduct adequate assessment of students that ensures they will be competent against all requirements of the training product, and that the assessment will be conducted in accordance with the Principles of Assessment and the Rules of Evidence.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
  - In its response, the organisation stated that a rectification action plan has been developed and affected students will/have been contacted to schedule gap training where required, and their competencies assessed and confirmed.
  - However, no evidence of a remediation plan, gap training or communication with any students was provided for review.

## Enrolment

### Standards for RTOs Clause 5.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **Not compliant***

**Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.**

- The following evidence was reviewed:
  - Training and Assessment Strategies for CPP20212, CPP20218, CPP30411
  - Enrolment confirmation letter
  - RTO's Website
  - Various emails from prospective student queries and RTO responses; prior to enrolment
- Review of the organisation's demonstrated enrolment practices found that it does not provide advice as required by Clause 5.1 to prospective students prior to enrolment or the commencement of training and assessment, whichever occurs first. For example, but not limited to:
  - The organisation advised that all prospective learners are interviewed by the trainer and assessor for suitability for a course. However, this process is not documented, nor is any evidence held that the student had attended the organisation for this interview. The trainer advised students are provided with an enrolment letter during this interview and asked to have a quick read prior to signing. Of note, this letter states 'thank you for enrolling'.
  - Furthermore, the enrolment practice of the organisation misaligned to the training and assessment strategies, as example and not limited to:  
The Training and Assessment Strategies provided for CPP20213/ CPP 20218 Certificate II in Security Operations and CPP30411 Certificate III in Security Operations, all state that prospective students will prior to enrolment:
    - complete a pre-enrolment questionnaire
    - assessment of skills, knowledge and experience
    - complete/pass LLN test with reference to benchmark and scoring



However, no evidence was found to confirm this process has been followed in practice on a consistent basis. A review of the following student records did not identify both a pre-enrolment questionnaire and LLN testing, such as described in the strategies:

- S Flynn
  - M Ash – noted to include LLN.
  - C Pritchard
  - P Weir
  - F Rodrigues
  - J Horne
  - S tank
- o A review of a number of pre-enrolment emails from the organisation in response to enquiries from prospective students, revealed that the information provided was generally the same as in the enrolment confirmation letter. Although on some occasions, it was noted that additional information had been provided, it did not align to the suitability checks detailed in the training and assessment strategies.
  - o Therefore, it is not evident that the organisation has a sufficient mechanism to ensure all learners are enrolled into an appropriate training product, and all student records confirm students have been appropriately assessed for suitability for the enrolment.

#### *Analysis of additional evidence*

- The following additional evidence was reviewed:
  - o ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - o In its response, the organisation advised that a number of procedural documents had been or soon will be developed to rectify the identified non-compliances. Those relevant to pre-enrolment appear to be:
    - *Pre-enrolment policy and procedures*
    - *Pre-enrolment checklist*
    - *Enrolment policies and procedures*
    - *Individual learners plan template*
    - *Pre-enrolment interview and questionnaire*
    - *Enrolment checklist*
  - o However, the organisation did not produce these documents with its response. Therefore, it is not evident that the organisation has a sufficient mechanism in place to ensure that, prior to enrolment or the commencement of training and assessment, whichever comes first, it will provide sufficient advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage.

---

#### **Standards for RTOs Clause 5.2**

---

***Original Finding: Not compliant***

***Finding following additional evidence: Not compliant***

**Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information**

---

that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:
  - i) estimated duration;
  - ii) expected locations at which it will be provided;
  - iii) expected modes of delivery;
  - iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and
  - v) any work placement arrangements.
- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.
- d) the learner's rights, including:
  - i) details of the RTO's complaints and appeals process required by Standard 6; and
  - ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;
- e) the learner's obligations:
  - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;
  - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and
  - iii) any materials and equipment that the learner must provide; and
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

- The following evidence was reviewed:
  - Training and Assessment Strategies for CPP20212, CPP20218, CPP30411
  - Enrolment confirmation letter
  - RTO's website (does not contain the student handbook)
  - Student Handbook
  - Various emails from prospective student queries and RTO responses; prior to enrolment
- The organisation's pre-enrolment information does not provide students with information regarding the policy and/or procedure it has in place for managing complaints and appeals process required by Standard 6. As example and not limited to:
  - The training and assessment strategies for the above mentioned training products state that students will be issued with a student handbook, including policies and procedures for complaints. Although the trainer advised the student handbook is provided to the learner during the enrolment interview, the organisation was unable to demonstrate that it has a sufficient mechanism to properly inform prospective learners prior to enrolment that enables them to make an informed decision. There was no evidence that the student was given the opportunity or time to read the organisation's policies and procedures prior to enrolment, as detailed under Clause 5.1.
  - Furthermore:
    - The enrolment date for unit CPPSEC2012 for Michael Ash was the same date as he was issued with information about the course, 18/3/2019.

#### *Analysis of additional evidence*

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf

- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - In its response, the organisation advised that a number of procedural documents had been or soon will be developed to rectify the identified non-compliances. Those relevant to pre-enrolment appear to be:
    - *Pre-enrolment policy and procedures*
    - *Pre-enrolment checklist*
    - *Enrolment policies and procedures*
    - *Individual learners plan template*
    - *Pre-enrolment interview and questionnaire*
    - *Enrolment checklist*
  - However, the organisation did not produce these documents with its response. Therefore it is not evident that the organisation has a sufficient mechanism in place to provide, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions
- The organisation advised that the Student Handbook, which includes relevant information is now accessible via its website. However, a review of the organisation's website on 8 April 2020, indicated it was not available to prospective learners.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage

#### Standards for RTOs Clause 5.3

**Original Finding: *Not compliant***

**Finding following additional evidence: *Not compliant***

**Where the RTO collects fees from the individual learner, either directly or through a third party, the RTO provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying:**

- a) all relevant fee information including:**
  - i) fees that must be paid to the RTO; and**
  - ii) payment terms and conditions including deposits and refunds;**
- b) the learner's rights as a consumer, including but not limited to any statutory cooling-off period, if one applies;**
- c) the learner's right to obtain a refund for services not provided by the RTO in the event the:**
  - i) arrangement is terminated early; or**
  - ii) the RTO fails to provide the agreed services.**

- The following evidence was reviewed:
  - Enrolment confirmation letter
  - RTO's website (does not contain the student handbook)
  - Student Handbook
  - Various emails from prospective student queries and RTO responses; prior to enrolment
- The organisation's pre-enrolment documentation omits the following information which it is obligated to provide to prospective learners regarding fees and/or payment terms and conditions:
  - Refund Policies and Procedures. It is not evident how this information was provided to learners prior to enrolment or the commencement of training and assessment (whichever comes first), given it is contained in the Student Handbook, which is not accessible on the organisation's website and only provided via an enrolment kit during the pre-enrolment interview, as detailed under Clause 5.1.

### Analysis of additional evidence

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
  - In its response, the organisation listed a number of new procedural documents, including:
    - *Refund Policy*
  - However, the organisation did not produce this document with their response, therefore it is not evident that the organisation has a sufficient mechanism that provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying all relevant fee information, including refunds.
- The organisation advised that the Student Handbook, which includes this policy is now accessible via its website. However, a review of the organisation's website on 8 April 2020, indicated it was not available to prospective learners.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage

## Support and Progression

### Support

#### Standards for RTOs Clause 1.7

**Original Finding: *Not compliant***

**Finding following additional evidence: *Not compliant***

**The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.**

- The following evidence was reviewed:
  - Emails to students to complete assessments
- The organisation has not demonstrated that it provides appropriate educational and support services to all students with regard to the support needs determined for each individual student. For example, but not limited to:
  - For two students who had not progressed their training and assessment; Stephen Flynn (CPPSEC2011B) and Filipe Rodrigues (CPPSEC3002A and CPPSEC3005A), the organisation sent an email requesting each student to complete their course as soon as possible, advising the training product was ceasing and transitioning to a new product. There was no evidence that the organisation had attempted to determine why the students had not continued their course or provided any additional support to assist the students to meet the requirements of the training package.

### Analysis of additional evidence

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:

- In its response, the organisation advised it is now utilising its management software to record accurate communication with students and to set regular reminders for student follow-ups. In addition, that enrolled students will be set to a learner's training timeline which will be used as a reference to the time required to complete the course and quickly identify students who may be falling behind or required additional assistance.
- However, on 1 April 2020 the organisation advised its management software system is 'currently under construction'. Therefore, it is not evident that the organisation has a sufficient mechanism in place to determine the support needs of individual learners and provide access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.
- The organisation was noted to provide some of the stated documentation on 6 April 2020. However, as it was after the due date for rectification evidence; 25 March 2020, it could not be considered at this stage

## Completion

### Standards for RTOs Clause 3.1

**Original Finding: Not compliant**

**Finding following additional evidence: Not compliant**

**The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.**

- The following evidence was reviewed:
  - A number of Certificate Testamurs issued for CPP20212 and CPP30411
  - A number of Statements of Attainment for HLTA311A
- The organisation has not demonstrated that its assessment system complies with the Principles of Assessment and Rules of Evidence (refer to non-compliance identified with Clause 1.8) with respect to students who were assessed as meeting the requirements of the training product and were issued with AQF certification documentation.
- The organisation has issued AQF certification documentation to students who have not met all requirements as specified in the relevant training package. For example, but not limited to:
  - The organisation delivers HLTAID003. However, does not deliver HLFA311A, which is included in the packaging rules and the organisation's delivery of CPP20212 and CPP30411. The organisation advised it had mapped the two units of competency and determined that all requirements for HLTA311A were covered in HLTAID003. Therefore, issued the relevant Certificates to students, which included HLTA311A in the Testamurs, separately issuing Statements of Attainment for HLTAID003. However, the following knowledge evidence requirement for HLTA311A does not appear to be encompassed within HLTAID003, as follows:  
'Substance misuse – common drugs and alcohol, including illicit drugs'.

#### *Analysis of additional evidence*

- The following additional evidence was reviewed:
  - ASQA response 240320.pdf
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:

- The organisation has not addressed the non-compliance for future students. In its response, the organisation advised that the full implementation and utilisation of its RTO Management software provides it with a fail-safe to ensure accuracy in the issuance of the correct course codes. In addition, future occurrences will be prevented by the regular review by the RTO manager and a third party RTO.
- However, on 1 April 2020, the organisation advised that its management software system is still 'under construction. Furthermore, no evidence was provided to identify how the oversight by the RTO Manager and audits by an third party RTO as mentioned under Clause 1.8 above, is a sufficient mechanism to ensure that AQF certification documentation will only be issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
  - In its response, the organisation stated that students issued the incorrect qualification have been identified and a rectification action plan has been developed. These students will/have been contacted to schedule gap training where required, competencies assessed and confirmed and where necessary new statements of attainment will be issued with the correct course codes referenced.
  - However, no evidence of a remediation plan, gap training or communication with affected students was provided for review.