

Audit Date: 23/11/2020 – 7/12/2020

RTO: Narre Community Learning Centre Inc

Applicant Details							
Applicant Name	Narre Community Learning Centre Inc	TOID	3977				
Address	1 Malcolm Crt, Narre Warren, 3805						
	Website	https://www.foundation.vic.edu.au/					
Registration Contact	Sarah Lynch						
Phone Number	0419 591 84	Email	sarah.lynch@fc.vic.edu.au				
Audit Team							
Audit Firm	Quorum QA Australia Pty Ltd	Auditor/s	Andrea Bateman				
Auditor/s		Other Attendees					
Registering Body Details							
Contact Person	Julie Florence						
Phone Number	9032 1560	Email	vet.audit@edumail.vic.gov.au				
Audit Details							
Type of Audit	Re-registration Audit						
Conditions Audited	3, 6, 7, 8, 9						
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	3.1, 3.2, 3.3, 3.4				
2016 VRQA Guidelines Audited	4.3	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8 (If applicable)					
	3.1, 3.2, 3.3, 3.4, 3.5	4.1, 4.2, 4.3 to 4.6 (If applicable)					
Audit Date/s	23/11/2020 – 7/12/2020						
RTO Background							
<p>Narre Community Learning Centre Inc (trading as Foundation Learning Centre) has a 40-year history starting off as a nursing mothers' group and evolving into a diverse and multi layered community organisation. It is a not-for-profit organisation, and offers non senior secondary school and adult education programs.</p> <p>The RTO has a contract with Skills First with 280 trainees. As a VET in Schools provider, it has external students coming in from other schools mainly from the Casey area and some students from Dandenong and City of Cardinia. It also provides pre VCAL programs and specialises in vulnerable and disadvantaged groups in the community. The mode of delivery is classroom based with the main site in Narre Warren.</p> <p>There have been approximately 370 enrolments this year, with the following enrolments in the two programs audited.</p> <table border="0"> <tr> <td>CHC22015 Certificate II in Community Services</td> <td>36</td> </tr> <tr> <td>ACM20117 Certificate II in Animal Studies</td> <td>62</td> </tr> </table>				CHC22015 Certificate II in Community Services	36	ACM20117 Certificate II in Animal Studies	62
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ACM20117 Certificate II in Animal Studies	62						

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TGA information indicates that the RTO has 5 training names including:

- Narre Community Learning Centre
- Foundation College
- Foundation Learning Centre
- Foundation Education & Training
- Vogue Academy.

The CEO indicated that the organisation is aiming to register Foundation Learning Centre Inc as the legal entity name and that the process is in train.

Qualifications/Units Audited¹

QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE

TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
CHC22015	CHC22015 Certificate II in Community Services	Narre Warren
ACM20117	ACM20117 Certificate II in Animal Studies	Narre Warren

Interviewee(s) – Staff name and position; employer name and position

Sarah Lynch	CEO
Bron O’Callaghan	Compliance Officer

Permanent Delivery Sites –

Do the RTO’s permanent delivery sites match the information provided by the VRQA?

Yes

No

X

If ‘No’, please provide amended details below:

Third party Arrangements –

Do the RTO’s third-party arrangements match the information provided by the VRQA?

Yes

No

X

If ‘No’, please provide amended details below:

¹ Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology

Audit Summary - AQTF Conditions of Registration

AQTF Conditions		Compliant	Non - Compliant	Not audited
Place an X in the appropriate column				
1	Governance			X
2	Interactions with the Registering Body			X
3	Compliance with Legislation	X		
4	Insurance			X
5	Financial Management			X
6	Certification & Issuing of Qualifications & Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs		X	
8	Accuracy and Integrity of Marketing		X	
9	Transition to Training Packages/Expiry of Accredited Courses	X		
Summary of Non-Compliance²				
<p>CF 6.1 The RTO's enrolment form included inaccurate and potentially confusing information.</p> <p>CF 6.2 Procedure on retention of RTO information relates to documents or paperwork and does not indicate that data (as per VETtrak) is to be retained for 30 years</p> <p>CF 6.3 The RTO has not ensured that all pre-enrolment packs identify the RTO by number or legal entity name.</p> <p>CF 7.1 The RTO documentation related to National Recognition is potentially confusing as it does not explain the purpose and the reason.</p> <p>CF 8.1 The RTO website includes a range of issues:</p> <ul style="list-style-type: none"> • Incorrect titling of Qualifications • Lack of information of legal entity name of the RTO and its number on the website • Incorrect use of the NRT logo. 				
Strengths				
The organisation has a focus on providing training for disadvantaged groups and has a well-documented system in place.				

² CF = Condition Finding. Finding references are aligned to the Detailed Findings section of this report.

Audit Summary - AQTF Standards

AQTF Standards/Elements	Compliant	Non - Compliant	Not audited
Standard 1			
1.1 – Continuous Improvement Strategy		X	
1.2 – Training and Assessment Strategies		X	
1.3 – Training and Assessment Resources		X	
1.4 – Trainer and Assessor Competency		X	
1.5 – Assessment Strategies		X	
Standard 2			
2.1 – Meeting the Needs of Clients	X		
2.2 – Continuous Improvement of Client Services	X		
2.3 – Provision of Information to Clients		X	
2.4 – Third-Party Engagement in Training and Assessment			X
2.5 – Provision of Support Services to Clients	X		
2.6 – Learner Access to Records of Participation		X	
2.7 – Complaints and Appeals Strategy		X	
Standard 3		X	
3.1 – Operations Management	X		
3.2 – Continuous Improvement of Operations		X	
3.3 – Third-Party Training and/ or Assessment Services			X
3.4 – Records Management		X	
Summary of Non-Compliance³			
<p>SF.1.1.1 Refer to SF1.5.4</p> <p>SF.1.2.1 and SF 1.2.2 Training and assessment strategies (TASs) were inaccurate.</p> <p>SF 1.3.1</p> <p>For ACM20117 Certificate II in Animal Studies, the RTO did not demonstrate that, for assessment purposes, it had access to:</p> <ul style="list-style-type: none"> An environment that accurately reflects a real workplace setting 			

³ SF = Standard Finding. Finding references are aligned to the Detailed Findings section of this report.

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- A range of animals.

SF 1.3.2 & 1.3.3

Session plans do not accommodate realistic timelines for assessment.

SF 1.4.1

Not all trainers demonstrated the equivalent competencies to those being taught and assessed, nor was it demonstrated that currency of vocational competence is maintained, or that currency in training and assessment knowledge is maintained.

SF 1.5.1 and 1.5.2

The assessment tools did not ensure valid and reliable decisions as:

- Observation checklists were essentially the performance criteria and did not elicit sufficient evidence to be collected
- Assessment did not meet the conditions of assessment or satisfy the requirements of the performance evidence
- There were no decision-making rules for the successful completion of tasks or unit
- Time allocation for simulated assessment were impractical.

SF 1.5.3

The RTO does not have a robust process to manage the decision-making processes in the RPL assessment tools.

SF 1.1.1 & 1.5.4

The RTO process for validation is not clear and does not include the evaluation of completed student assessments to improve assessment. The RTO has not demonstrated systematic implementation of validation of assessment.

SF 2.3.1

The RTO has not ensured that the applicant has been fully informed about the training, assessment and support services to be provided, and about their rights and obligations – prior to enrolment or payment of fees.

SF 2.6.1

Information pertaining to learner access to records is inconsistent. There is also no reason why VCAL must approach the VCAA when the VET records and participation records are maintained at RTO level.

SF 2.7.1

The complaints, grievances and appeals processes are inadequate.

SF 3.2.1

Given the issues embedded in this report, the systems established, including internal audit, have not ensured a systematic and continuous improvement approach to the management of operations.

SF 3.4.1

The RTO has not ensured that the Enrolment Form collects accurate information.

Audit Summary – 2016 VRQA Guidelines for VET Providers

2016 VRQA Guidelines	Compliant	Non - Compliant	Not audited
1. Governance, Financial viability and Management systems			
1.1 – Strategic Plan and Business Plan			X
1.2 – Financial Viability			X
1.3 – Management Systems			X
1.4 – Governance			X
2. Transparency and oversight of third parties			
2.1 – Third party agreement			X
2.2 – Co-operation with VRQA			X
2.3 – Notifying VRQA of Third-party agreements			X
2.4 – Information - Disclosure of third-party services			X
2.5 – Pre-enrolment materials - Disclosure of third-party services			X
2.6 – Changes to third party services			X
2.7 – Complaints - Third party services			X
2.8 – Appeals - Third party services			X
3. Trainer and assessor qualification (including individuals working under the supervision of a trainer)			
3.1 – Vocational & Industry skill requirements		X	
3.2 – Training and Assessment (TAE) skill requirements	X		
3.3 – Assessment only skill requirements			X
3.4 – Supervision arrangement requirements			X
3.5 – Trainer under supervision skill requirements			X
4. Delivery of training and assessment services			
4.1 – Training and assessment practices		X	
4.2 – Amount of training		X	
4.3 – TAE - Independent validation of assessment system, tools, processes and outcomes			X
4.4 – TAE – Trainer and Assessor skills (1 January 2016 to 31 December 2016)			X
4.5 – TAE – Trainer and Assessor skills (1 January 2017 onwards)			X
4.6 – TAE – Trainer under supervision requirements			X

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4.7 – TAE – Registration requirements			X
5. Annual Declaration of Compliance			
5.1 – Annual Declaration of Compliance			X

Summary of Non-Compliance⁴

GF.1.3.1

Refer to Standard 1.4.

GF.1.4.1

The training and assessment strategies designed through the TAS, session plans and assessment tools did not enable each student to meet the requirements of the Training Package and, specifically, each unit of competency in which the student is enrolled.

GF.1.4.2

The RTO has not taken into account the individual needs of learners, the mode of delivery and the requirements for assessment when determining the amount of training.

⁴ GF = Guideline Finding. Finding references are aligned to the Detailed Findings section of this report.

Detailed Findings - AQTF Conditions of Registration

CONDITION 1 - Governance	Not audited in Phase 2 audit
CONDITION 2 - Interactions with the Registering Body	Not audited in Phase 2 audit
CONDITION 3 - Compliance with Legislation	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Induction and Professional Development Policy • Child Safe Policy • FLC induction: <ul style="list-style-type: none"> ○ Child Safety Statement ○ FLC Induction Document ○ Code of Practice ○ Duty of Care Policy and Procedure ○ New Staff Welcome Letter ○ Occupational Health and Safety Policy ○ Occupational Health and Safety Procedure ○ Staff Confidentiality Agreement Form 	

- Staff Induction Renewal Letter
- Staff and Volunteer Code of Conduct
- Staff Educator Manual
- Employee Handbook
- Trainer and Assessor Handbook
- June Attendance PD
- Organisational chart – NEW – July 2020
- PD Attendance Session 2 Sarah Lynch 22 Sept 2020
- PD Attendance Session 4 Doug Miranda, Pam Elias 22092020
- PD Attendance Session1 Mark Storey Tania Sacco 22092020
- PD Attendance Session 3 Briana Lorenze 22092020
- Student Handbook
- Employee Commencement Form
- Induction Survey
- Melissa Plant Induction Survey
- Sample student (x 10) AVETMISS reports

Induction and Professional Development Policy notes:

- General Induction is the introduction of staff, trainers/educators and volunteers to the values and working conditions of FLC
- Staff induction is the responsibility of the Compliance team and should be provided prior to commencement using the FLC induction process

- Board of Management (BOM) induction should occur within one (1) month of joining
- The induction of volunteers should be undertaken initially by the Volunteer Coordinator, then by the area Manager/Coordinator of the specific location. Volunteers are required to complete the FLC induction
- Staff and volunteers are required to complete the induction process on an annual basis.
- Area-specific induction will also apply when staff change to a new position/area of work.
- The general induction and the area specific orientation for trainers/educators will be conducted by the Department Head.
- The FLC Administrative & Data Entry Induction Checklist must be completed with any new staff member who commences in a position requiring administration and/or data entry for scope of registration courses.
- Volunteers assisting in an administrative capacity must be advised during their area specific orientation that they are not permitted to enter data into the student management system except that of attendance for courses that are not listed on FLC's scope of registration and at the instruction of the Department Head.

Induction and Professional Development Policy makes reference to:

- Online Induction Form
- Online Induction Survey

Provided was a sample Employee Commencement Form (sample only), Induction Survey (sample only) and completed survey (Melissa Plant).

Interview with CEO and Compliance Officer

Interviewees confirmed that the forms listed above have been used in September 2020.

The RTO appears to have sufficient controls in place.

CONDITION 4 – Insurance

**Not audited in
Phase 2 audit**

CONDITION 5 - Financial Management

**Not audited in
Phase 2 audit**

CONDITION 6 - Certification & Issuing of Qualifications & Statements of Attainment

Non-Compliant

Evidence/Documentation Reviewed

- Enrolment Pack Youth
- VETiS Enrolment Pack
- FLC VET Enrolment Form
- Issuing of Certificate and Statements of Attainments Procedure
- Procedure for Skills First Uploads – Monthly, Annually
- Procedure for Retention of Registered Training Organisation Information
- PTR and Enrolment Policy and Procedure
- VETtrak signed Foundation Learning Centre Licence Renewal Letter 24/7/2020

Certification

Issuing of Certificate and Statements of Attainment Procedure includes detailed processes for accessing via VETtrak and indicates that two signatures are required on the Certificates. There is no reference in this document to signing requirements of SoAs.

Sample Qualification:

- Inaccurately used a greyscale NRT logo, rather than fully black, fully green or coloured logo

- Does not identify the RTO name or number on the Qualification. It only identifies the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. Note that Foundation Vogue Academy is not a listed training name on TGA.
- Identifies the RTO name or number at the end of the document Record of Results, plus the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. However, Foundation Vogue Academy is not a listed training name on TGA.

Sample Statement of Attainment:

- Inaccurately used a greyscale NRT logo, rather than fully black, fully green or coloured logo
- Identifies the RTO name or number at the end of the document, plus the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. However, Foundation Vogue Academy is not a listed training name on TGA.

Records retention

Procedure on retention of RTO information relates to documents or paperwork:

- Hard copy records retentions processes
- Certificates and Statements of Attainment are to be retained for 30 years
- Does not indicate that data (as per VETtrak) is to be retained for 30 years

AVETMISS compliant system

Letter of renewal

Sample of the 10 student AVETMISS printouts.

Data returns

Procedure for Skills First Uploads – Monthly and Annual – indicates that month that the annual upload is to occur and the process for correcting errors. Interview with Compliance Officer indicated that the uploads to Skills First are undertaken monthly, and that all errors are corrected within the system.

USI

PTR [Pre-Training Review] and Enrolment Policy and Procedure do not mention the collection or generation of the USI.

The Enrolment Form does allow for the collection of an existing USI, and directs the applicant to <http://www.usi.gov.au/create-your-USI/>. It includes a simple privacy statement. Note that the Enrolment Form identifies the RTO by name or number in the footer. It notes that it is the Foundation Learning Centre 'Formerly known as Narre Community Learning Centre'.

Included on the Enrolment Form (p. 8) is the following note:

I understand that Foundation Learning Centre's name included in the notice may be different to the name they are familiar with – the name of the organisation verifying my USI is Foundation Learning Centre.

This advice is potentially confusing to the applicant, as Foundation Learning Centre is on all documents and website and therefore would not be 'potentially confusing'.

The Form also includes the Victorian Government VET Student Enrolment Privacy Notice. The Enrolment Form refers to the *Data Provision Requirements 2012*, which is not relevant to a VRQA registered RTO.

Enrolment packs

Enrolment packs included the RTO by number or legal entity name.

Closing meeting with CEO and Compliance Officer

The Compliance Officer in relation to Qualifications and Statements of Attainment, provided newer samples of the certification documents.

- Qualification sample used the NRT logo in line with its specifications; however, it did not identify the RTO name or number on the Qualification. It only identifies the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. Note that Foundation Vogue Academy is not a listed training name on TGA.
- Record of Results included the RTO legal entity name and the number, and also the NRT logo according to its specifications. However, it identifies the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. Note that Foundation Vogue Academy is not a listed training name on TGA.

- Statement of Attainment included the RTO legal entity name and the number, and also the NRT logo according to its specifications. However, it identifies the trading name/s including Foundation Vogue Academy, Foundation College, Foundation Learning Centre. Note that Foundation Vogue Academy is not a listed training name on TGA.

CF.6.1	Finding	Required Rectification(s)
	The RTO's enrolment form included inaccurate and potentially confusing information.	The RTO is to adjust the enrolment form to ensure that it is accurate.
CF.6.2	Finding	Required Rectification(s)
	Procedure on retention of RTO information relates to documents or paperwork and does not indicate that data (as per VETtrak) is to be retained for 30 years	The RTO is to adjust the procedure to ensure that it is clear that data records on VETtrak will be retained for at least 30 years.

CONDITION 7 - Recognition of Qualifications Issued by other RTOs		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Student Handbook • Student Record Request Form • National Recognition and Credit Transfer Procedure • Pre-training Interview Form • Application for Credit Transfer • Procedure for National Recognition, https://www.foundation.vic.edu.au/wp-content/uploads/2019/05/Procedure-on-National-Recognition.pdf <p>Student Handbook:</p> <ul style="list-style-type: none"> • Refers to Credit Transfer in relation to accepting the same or equivalent unit or module • Refers to National Recognition of AQF qualifications and Statements of Attainment. • Does not explain how these two processes are different. <p>National Recognition and Credit Transfer Procedure acknowledges the requirement to accept AQF Qualifications and Statements of Attainment, and includes a process. It does not explain what is national recognition, or why it is required. The process is supported by an Application for Credit Transfer form, which is illogical as it includes reference to RPL. The Procedure for National Recognition is the same document but listed on the website with a different title. This is potentially confusing to applicants, students and staff. Neither procedure references the use of a form.</p>		
CF.7.1	Finding	Required Rectification(s)
	The RTO documentation related to National Recognition is potentially confusing as it does not explain the purpose and the reason.	The RTO is to revise its documentation to ensure that the information regarding National Recognition is clear and unambiguous.
Improvement Opportunities		
There are two procedures related to National Recognition. It is suggested that the RTO minimise the documentation to one procedure.		

CONDITION 8 - Accuracy and Integrity of Marketing	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Website, accessed 30/11/2020, at https://www.foundation.vic.edu.au/ • Student Handbook Version: 1.10 • VET Student Handbook Version: 1.6 • Brochures: <ul style="list-style-type: none"> ○ CHC22015 Certificate II in Community Services ○ ACM20117 Certificate II in Animal Studies (x2) <p>Website does not reference on each page the legal entity name or number of the RTO, which is potentially confusing for applicants and learners.</p> <p>Website includes a number of key documents relevant to applicants, some of which are listed below:</p> <ul style="list-style-type: none"> • Fees, Charges, Withdrawal and Refunds Policy • Child Safety Statement • Child Safe Policy • Complaints Appeals and Grievances Policy and Procedure • Enrolment Form • Procedure on National Recognition. <p>TGA information indicates that the RTO has 5 training names including:</p> <ul style="list-style-type: none"> • Narre Community Learning Centre • Foundation College • Foundation Learning Centre 	

- Foundation Education & Training
- Vogue Academy.

Vogue Academy is a trading name used for the hairdressing and salon qualifications, <https://www.foundation.vic.edu.au/courses-programs/hairdressing/>. Foundation Vogue Academy is also used which is not a registered trading name. Foundation College is a term used for the Adult Education programs, pertinent to this audit, <https://www.foundation.vic.edu.au/courses-programs/youth/vetis-2/> but also includes the hairdressing and salon qualifications.

List of qualifications at, <https://www.foundation.vic.edu.au/courses-programs/youth/vetis-2/>, including nomenclature errors for the following Qualifications, using an ‘&’ instead of ‘and’:

- ICT20115 Certificate II in Information, Digital Media and Technology
- ICT30118 Certificate III in Information, Digital Media and Technology

List of qualifications for the CGEA incorrectly lists them as:

- Certificate I in General Education for Adults (CGEA)
- Certificate II in General Education for Adults (CGEA)

Brochures refer to the RTO as ‘FLC being a Registered Training Organisation (RTO #3977) and providers Nationally Recognised Training’. This is potentially misleading as FLC or references to Foundation College or Foundation Learning Centre are trading names, and not the legal entity name.

The Nationally Recognised Training logo is linked to the above clause, which is inaccurate as the logo pertains to the national recognised qualification, not the RTO or its trading name/s.

VET Student Handbook Version: 1.6

This Handbook was found on the website on 30/11/2020. The RTO indicated that it is a superseded version and is now not relevant. It was deleted from the website on 1/12/2020.

CF.8.1

Finding

Required Rectification(s)

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<p>The RTO website includes a range of issues:</p> <ul style="list-style-type: none"> • Incorrect titling of Qualifications • Lack of information of legal entity name of the RTO and its number on the website • Incorrect use of the NRT logo. <p>This list is not exhaustive, but is illustrative only.</p>	<p>The RTO is to ensure that it presents itself accurately to the public, its applicants, and its learners in all of its information, including the website and all documents on the website.</p>
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CONDITION 9 - Transition to Training Packages/Expiry of Accredited Courses	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Transition of Training Package Register • Transition of Qualifications within Training Packages and Accredited Courses Procedure <p>Transition of Qualifications within Training Packages and Accredited Courses Procedure:</p> <ul style="list-style-type: none"> • Identifies who is responsible • Notes revisions to TAS, learning materials and assessment material and suitably qualified staff • Does not fully explain the steps to be taken once a Training Package or accredited course is superseded, such as how the above will be implemented and monitored, or how marketing materials will be revised. <p>Register is populated and includes those for transition Training Packages 2020.</p>	
Improvement Opportunities	
<p>The Transition of Qualifications within Training Packages and Accredited Courses Procedure is limited in detail and does not provide sufficient guidance to those implementing transition arrangements.</p>	

Detailed Findings - AQTF Standards

ELEMENT 1.1 - The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment.	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Continuous Improvement Policy • Continuous Improvement Procedure • Procedure for Continuous Improvement, Internal Auditing and Risk Management • Admin Continuous Improvement Register 2020 • Adult Education Continuous Improvement Register • Continuous Improvement Register • FLC 2020 vetregQualsIndicators • Email dated 26/6/2020 to the VRQA regarding the 2019/20 Quality Indicator report • NH & Comm ED Continuous Improvement Register 2020 • Youth Education Continuous Improvement Register 2020 • Internal Audit Spreadsheet • Email providing the spreadsheet to Board of Management 7/10/2020 • Sample partial Nash audit report for funding contract • Sample partial Nash audit report for AQTF and VTQA Guidelines 	

Continuous Improvement Policy indicates:

- That feedback is collected through AQTF learner and employer survey forms
- That the RTO records and evaluates feedback both manually and on Novocare system. Action is taken to rectify issues.
- That external moderation is undertaken.

Continuous Improvement Procedure indicates:

- Refers to the feedback collected through the AQTF learner and employer survey forms which are to be issued before the end of each course. There is no advice as to when and how the report is to be sent to the VRQA.
- Feedback is sought from staff meetings, manager meetings, tutor meetings and communications through email or written documentation.
- The system allows for four stages of actions that must be applied (short- or long-term action, action final taken, preventative action). Novocare designates the responsibilities and timelines
- Feedback is sought from employers in the Youth Department
- A moderation/validation schedule is compiled each year and makes reference to a Continuous Improvement of Education and Training Procedure (not sighted).

Procedure for Continuous Improvement, Internal Auditing and Risk Management:

- Indicates internal audits will be conducted annually against the AQTF (but does not mention the VRQA Guidelines), and the funding contract. Actions will be documented and timelines set. Reports are to be forwarded to the CEO for review.
- Indicates student and employer questionnaires are to be conducted on the completion of program/course
- Refers to additional surveys and feedback, noting that feedback from staff is obtained in a range of ways
- Indicates that assessment is externally validated, and student performance is externally moderated
- Indicates that monitoring and analysis of student results and data will be used to identify trends and facilitate improvement in retention and progression rates. It does not indicate how this will be done and when. Interview with the Compliance Officer indicated that reviewing data and actioning intervention strategies is

undertaken at meetings (e.g., Youth, VETiS) and aims to identify students at risk and that a plan is worked out with the Wellbeing team and may include meetings with parents and home school.

Internal Audit Spreadsheet related to Skills First contract criteria but did not include any aspects of the audit against the AQTF or the VRQA Guidelines.

VRQA Quality Indicators report 22/6/2020 sighted. Email to VRQA notes submission 29/6/2020.

Validation is referred to in Standard 1.5.

Registers

There are 5 different registers. Interview with the Compliance Officer indicated that the multiple registers were introduced this year for each department, to better identify issues and to be able to be able 'to drill down on what each department is doing'.

Registers indicated the source of the improvement, but not who is responsible as noted above, nor timelines, other than when task is completed. Continuous Improvement Register indicates that there was an internal audit conducted by Nash Training in March 2020 and that the report went to the Board of Management. It is not made clear whether this was an AQTF/VRQA Guidelines audit and/or a funded audit against the Skills First contract. There is no indication as to when the actions identified in this report were completed.

There was no evidence in the registers related to the findings of the AQTF client survey and actions to be taken.

Closing meeting interview with CEO and Compliance Officer

Interview confirmed that the Internal Audit undertaken by external consultants, Nash Training, did address the AQTF and the VRQA Guidelines. At the Closing Meeting additional evidence was provided that this was the case.

SF.1.1.1 Finding	Required Rectification(s)
Issues were identified with implementation of validation. Refer to 1.5.	Refer to 1.5

Improvement Opportunities

It is suggested that the RTO consider reducing the number of procedures, that appear duplicative, related to continuous improvement strategies.

<p>ELEMENT 1.2 - Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>Training and assessment strategies:</p> <ul style="list-style-type: none"> • CHC22015 Certificate II in Community Services [VETDSS – Part-time] • ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] • ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] <p>CHC22015 Certificate II in Community Services [VETDSS – Part-time] indicates:</p> <ul style="list-style-type: none"> • That there are no entry requirements • Prior to enrolment applicants are to undertake a pre-training review • Requires applicant to be enrolled in VCAL or VCE years 10, 11 or 12 • Classes are to run for 5.5 hours one day a week for 34 weeks (= 187) • Volunteering units (CHCVOL001 Be an effective volunteer) requires 20 hours of volunteering • Maximum of 24 students per class • Notes the assessment methods for units • Notes the amount of training as: 30 hours simulated workplace assessments, 151 hours facilitated activities, 5 hours workplace learning and assessment monitored by assessor = 186 hours. Volume of learning has in addition unstructured hours, including 79 hours private study and 20 hours work placement = 99. The total number of hours of structured and unstructured learning is 285 hours. Note that this includes 20 hours of placement plus 5 hours of assessor at the placement which is inflating the figure. Note that with the volunteering unit removed from the TAS this information is now not accurate. Volume of learning is designed to align with the nominal hours. • Schedule of units indicates there are guest speakers and excursions. 	

- Lists the trainers/assessors (x 2)
- Outlines the level of industry consultation – but not what was learnt from the consultations
- Indicates a validation schedule
- COVID supplement to the TAS notes:
 - Teams and Zoom meetings were to be utilised
 - Volunteering unit was replaced with *BSBINS201 Process and Maintain Work Place Information* (the unit code was not documented in the TAS). There is no information about changes to amount of training.
 - *'FLC VETDSS Department cohort is made up of a range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with the requirements [sic] of "Specialist School" therefore enabling the need to maintain some face to face training for those students deemed 'vulnerable'.'*

ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] indicates:

- There are no entry requirements
- Delivery is to be conducted 1 day per week for 5.5 hours, over 2 calendar years. 68 weeks @1 day face-to-face x 5.5 hours (374 hours). Independent study may be required on individual students needs and industry experience
- Target group is those in years 10, 11 or 12 VCE or VCAL program
- There is to be between 10 and 20 students per class
- Outlines assessment methods per unit
- Structured activities total 384 hours, which includes 95 hours of simulated assessment (some units do not have hours attached to assessment). There are an additional 26 hours private study (unstructured) = 410 hours. Note that this aligns with the nominal hours.
- Lists the equipment
- Trainer is listed as Deb Lovett – which is out of date

- Lists persons consulted – but does not include how this informed the strategy
- Outlines validation schedule
- COVID supplement notes:
 - That simulations have been postponed until face-to-face delivery could return on site
 - *'FLC VETDSS Department cohort is made up of a diverse range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with the requirements [sic] of "Specialist School" therefore enabling the need to maintain some face to face training for those students deemed 'vulnerable'. For a list of students attending onsite learning please refer to attendance.'*

ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] indicates:

- The cohort is 'usually above the age of 18 years. They may be referred by Job Active Agencies including Disability Services. Student cohort in this program may be of a diverse range of nationalities and age groups and may be job seekers looking to enter the industry, may have been without work for some time, have become disengaged from a mainstream educational setting or have a disability and require additional support or time with education and learning or may just be looking for a new pathway in the Animal Care Industry. Most students looking to enrol in this course may have little to no experience in the Animal Care Industry within a vocational context.'
- There is to be between 10 and 20 students per class
- Outlines assessment methods per unit
- Trainers are listed as Melissa Plant and Deb Lovett (which is out of date)
- Structured activities total 297 hours, which includes 70 hours of assessment (some units do not have hours attached to assessment). There are an additional 113 hours private study (unstructured) = 410 hours. Note that volume of learning aligns with the nominal hours.
- Lists the equipment
- Outlines validation schedule
- Lists persons consulted – but does not include how this informed the strategy
- COVID supplement indicates that during the second lock down classes were suspended.

<p><u>Interview with CEO and Compliance Officer</u> Compliance Officer indicated that the reason some units do not have simulated hours attached to the unit, is because these assessments would be written assessments which therefore are presumably calculated in the classroom hours if conducted there. In addition, the Compliance Officer indicated that the private study hours are calculated so that the total hours add up to Nominal Hours.</p>	
SF.1.2.1 Finding	Required Rectification(s)
<p>CHC22015 Certificate II in Community Services The TAS was not accurate as:</p> <ul style="list-style-type: none"> • A unit exchange due to COVID-19 has not resulted in changes to schedule or volume of learning information • Assessment methods were inaccurate • Structured classroom hours and simulated assessment hours did not align with the session plans. 	<p>The RTO is to review and revise the TASs to ensure that they are accurate and reflect delivery and assessment.</p>
SF.1.2.2 Finding	Required Rectification(s)
<p>ACM20117 Certificate II in Animal Studies The TAS was inaccurate as:</p> <ul style="list-style-type: none"> • Assessment methods noted in the TAS did not align to what was used in the assessment tool • Trainer nominated was not current • Structured classroom hours and simulated assessment hours did not align with the session plans. 	<p>The RTO is to review and revise the TASs to ensure that they are accurate and reflect delivery and assessment.</p>

<p>ELEMENT 1.3 - Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • City of Casey Lease Agreement • Training and assessment strategies: <ul style="list-style-type: none"> ○ CHC22015 Certificate II in Community Services [VETDSS – Part-time] ○ ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] ○ ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] • Statutory Declaration – summary of facilities and photos • Spreadsheet of room capacity • Floor plan of Malcolm Court sites <p>Resources for:</p> <ul style="list-style-type: none"> • CHC22015 Certificate II in Community Services <ul style="list-style-type: none"> ○ <i>CHCCOM001 Provide first point of contact</i> ○ <i>CHCCOM005 Communicate and work in health or community services</i> • ACM20117 Certificate II in Animal Studies <ul style="list-style-type: none"> ○ <i>ACMGAS201 Work in the animal care industry</i> ○ <i>ACMGAS204 Feed and water animals</i> <p>Casey lease agreement commencing 1 January 2019 for 5 years.</p>	

Statutory declaration (Signed 26 November 2020) does not indicate how many classrooms there are for classes, including those not in this sample. In terms of the Animal Studies program, there is reference to access to stainless steel examination bench, sink with hot/cold running water, hydro bath and animal enclosures. The statutory declaration notes that a full range of resources can be found in the TAS; however, the TASs were not attached to the declaration.

Of the two classrooms photographed, it appears one can seat ten students and the other possibly 10–15. Clarification with interviewees indicated that the 2 photos of classrooms pertain to Community services, Training Room 8 which is currently set up for 10 students (this is a long room and can take 20 students as it is 2 rooms with a partition). The other photo pertains to Training Room 2 which is quite large and can take 15–20 students. Training Room 1 is the same as Training Room 2.

Interview:

The interviewees confirmed that there are two buildings and supplied a floor plan to demonstrate general infrastructure and facilities. Interviewees indicated that there is internet access in the classrooms and there are banks of computers for use by students. They indicated that there is a hall, and the photos can be seen on the website as this is rented for functions. Currently, during COVID-19 the capacity is 50, but normally it is 200. A room off the hall is used as a simulated setting for small groups and is set up with various equipment for Animal Studies.

Class sizes:

- Community Services – 32 student enrolments across two classes
- Animal Studies – 68 student enrolments across 4 classes

Tour of site

A virtual tour of the site was undertaken in real time via computer/camera link. The tour indicated:

- Training Room 2 (Community Services) had 8 tables and 14 chairs, and a trolley of laptops. This room could accommodate 20 students in normal circumstances. Note that Training Room 1 was the same.
- Training Room 8 was the smaller break out room, and tables were set up with 12 chairs.
- Hall – was large and chairs and tables are stored in a large space with a roller door
- Room off to the side of the hall was set up for the Animal Studies. It included table and chairs, but also had a stainless-steel bench, plus small cage, small carry cage, dishes, towels, dried food, bandages, radiation sign, hydro bath. Note that the Elizabethan Collar was not sighted. Soft animal toys were used in cages, and also for bandaging purposes.

The Units of Competency for Animal Studies requires amongst other requirements:

- An environment that accurately reflects a real workplace setting
- A range of animals.

CHC22015 Certificate II in Community Services

CHCCOM001 Provide first point of contact

- TAS indicates that there are 30 hours of structured learning, including simulated assessments.
- PPTs – first point of contact – topic 1
- PPTs – communication skills
- PPTs – remote learning week 2
- Aspire resource booklet
- Session plans – 7 sessions (including simulated assessments). However, the sessions are from 9 am – 3 pm with 4 hours and 50 minutes excluding the breaks = approximately 32 hours f2f. Session plan indicates that the time devoted to Assessment Task 2 is undertaken over 2 sessions; 4 hours and 20 minutes. However, the session plan does not include time allocated to the assessment of the role play dealing with a distressed person (only a practice session). Regardless, it is difficult to see how an assessor can individually observe 15-16 students completing 3 role plays each in this time.
- Microsoft Teams CHCCOM005/CHCCOM001 transcript
- Assessor Guide and Assessment tool, mapping – refer to 1.5 for comments

CHCCOM005 Communicate and work in health or community services

- TAS indicates that there are 30 hours of structured learning including simulated assessments.
- Aspire resource workbook
- PPTs – topic 1

- Session plans – 6 sessions (including simulated assessments). Sessions are from 9 am – 3 pm with 5 hours and 10 minutes excluding breaks = 40 hours f2f. Session plan indicates that the time devoted to Assessment Task 4 (and completing file note for Task 2) is 2 hours. It is difficult to see how an assessor can individually observe 15–16 students completing 3 role plays each in this time.
- Microsoft Teams CHCCOM005/CHCCOM001 transcript
- Assessor Guide, Assessment tool – workbook, mapping. Refer to 1.5 for comment.

ACM20117 Certificate II in Animal Studies

ACMGAS201 Work in the animal care industry

- TAS indicates that there 25 hours of f2f and 5 hours of simulated assessment.
- Student Resource Workbook
- Student Assessment Book
- Training and assessment guide for assessors, included session plans. Session plans indicate that there are 5 lessons, of 4.75 hours each = 23.75 hours. Session plans make reference to PPTs. The Compliance Officer sought clarification and there are no PPTs for this unit. Session plan indicates that Task 5 is completed in approximately 2.5 hours for 15–17 students x 2 observations. How the number of students can be individually observed and assessed for this task in the time allowed does not appear logical.
- Mapping.

ACMGAS204 Feed and water animals

- TAS indicates that there 25 hours of f2f and 15 hours of simulated assessment. There is no detail on the breakup on sessions, e.g. hours allocation.
- Assessor Guide x 3
- Assessment tasks (feeding basics, feeding quantities, project)
- 4 sets of PPTs for Sessions 1–4, with some activities embedded – these are the resource
- Mapping

<p>There was no explicit session plan to determine how or when the assessments would occur.</p> <p><u>Trainers/Assessors</u> Refer to 1.3 for comment.</p> <p><u>Assessment</u> Refer to 1.5 for comment.</p>	
SF.1.3.1 Finding	Required Rectification(s)
<p>ACM20117 Certificate II in Animal Studies</p> <p>The RTO did not demonstrate that, for assessment purposes, it had access to:</p> <ul style="list-style-type: none"> • An environment that accurately reflects a real workplace setting • A range of animals. 	<p>The RTO is to demonstrate that, for assessment purposes, it has access to:</p> <ul style="list-style-type: none"> • An environment that accurately reflects a real workplace setting • A range of animals.
SF.1.3.2 Finding	Required Rectification(s)
<p>ACM20117 Certificate II in Animal Studies</p> <p><i>ACMGAS201 Work in the animal care industry</i></p> <ul style="list-style-type: none"> • Session plans do not accommodate realistic timelines for assessment. <p><i>ACMGAS204 Feed and water animals</i></p> <ul style="list-style-type: none"> • The lack of session plans does not ensure that the program is delivered to meet the requirements of the Training Package. 	<p>The RTO is to revise or develop the session plans to demonstrate that the program meets the requirements of the Training Package.</p>
SF.1.3.3 Finding	Required Rectification(s)
<p>CHC22015 Certificate II in Community Services</p> <p><i>CHCCOM001 Provide first point of contact</i></p> <p><i>CHCCOM005 Communicate and work in health or community services</i></p> <ul style="list-style-type: none"> • Session plans do not accommodate realistic timelines for assessment. 	<p>The RTO is to revise the session plans to demonstrate that the program meets the requirements of the Training Package.</p>

<p>ELEMENT 1.4 - Training and assessment is delivered by trainers and assessors who:</p> <ul style="list-style-type: none"> a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and b) have the relevant vocational competencies at least to the level being delivered or assessed, and c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence. 	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Induction and Professional Development Policy • 3 staff files <p>Induction and Professional Development Policy notes:</p> <ul style="list-style-type: none"> • General induction occurs for all staff, and area specific orientation also occurs • The CEO is responsible for budgeting, arranging, and approval of all staff, trainer/educator and volunteer PD and for organising 3 professional development activities • All staff/trainers are responsible for completing a quarterly professional development record report and must include evidence of attendance. • Performance review includes identifying mutually agreed development needs and obtaining commitments and timeframes for achieving them. <p>CHC22015 Certificate II in Community Services [VETDSS – Part-time] Two trainers are listed on the TAS.</p> <p>Allan Snashall:</p> <ul style="list-style-type: none"> • Associate Diploma of Arts – Welfare Studies, Monash University, 01 Feb 2012, • TAE40110 Certificate IV in Training and Assessment – Sandybeach Community, 29/08/2012 – includes the LLN unit and <i>TAEASS502 Design and develop assessment tools</i> 2019 	

- WWC 0780136A-01 (expires 2021), Police Check 12/08/2020
- CV – indicates extensive experience in the community services and welfare fields
- Matrix maps units and elements to previous qualifications, industry experience, and to professional development (in some instances).
- Quarterly Professional Development Form for period December 2019 to November 2020 – indicates that PD for internal processes of the RTO (x3), online training with Holmesglen regarding security, manual handling and evacuation training, attendance at local incursion (via online) to a youth hub as part of the program, 2 sessions at centres for students as the Holmesglen trainer. There is no clear alignment to vocational or teaching and assessment currency.

Kate MacMillan:

- CHC50502 Diploma of Youth Work 2008, CHC51102 Diploma of Alcohol and Other Drugs Work 2008, CHC41102 Certificate IV in Mental Health Work (Non-Clinical) 2008, Masters in Youth Health and Education Management 2005, and Graduate Diploma of Social Science (Human Services – Counselling) 2000 (partial),
- Diploma of Vocational Education and Training Practice 21697VIC – 2010, *TAELLN401A Address adult, literacy and numeracy skills* 2016, TAE40110 Certificate IV in Training and Assessment 2013, TAA40104 Certificate IV in Training and Assessment 2006 (includes *TAAASS403A Develop Assessment Tools*), Bachelor of Education (Secondary) 1994.
- Police check 10/2/3030, WWC expires 2022
- CV indicates a mix of experience in the field and as a trainer
- Matrix maps units and elements to previous qualifications, industry experience, and to professional development
- Quarterly Professional Development Form (x 2) for April to June 2020 and September 2020 – PD sessions for child safe standards and inhouse sessions for internal processes, webinar on family violence and LGBTIQA, family violence in schools webinar, mental health and wellbeing, TAS meeting. There is no clear alignment to teaching and assessment currency.

ACM20117 Certificate II in Animal Studies

Melissa Plant:

- Certificate IV Veterinary Nursing (ACM40412) 2018
- Certificate IV Workplace Training and Assessment (TAE40116) 2020 [includes required addition 2 units]

- Police check 17/11/2020, WWC expires 2025
- No PD records. Currency of vocational skills and knowledge and training and assessment is not clear. Interview with CEO and Compliance Manager noted that Melissa is a new staff member and will submit professional development form later this month.
- Resume indicates a background in the field. Notes that the trainer is currently working as a Vet nurse; however, the CV is undated but stamped 4/11/2020
- No matrix on file.

SF.1.4.1	Finding	Required Rectification(s)
	<p>CHC22015 Certificate II in Community Services The RTO has not demonstrated that its trainers have maintained currency of vocational competence (Allan S) or that currency in training and assessment knowledge is current (Allan S and Kate M).</p> <p>ACM20117 Certificate II in Animal Studies The RTO has not demonstrated that its trainer has the equivalent competencies to those being taught and assessed, nor that the trainer has maintained vocational currency and training and assessment currency.</p>	<p>The RTO is to demonstrate that its trainers meet the requirements of this Standard in relation to:</p> <ul style="list-style-type: none"> • Have the relevant vocational competencies at least to the level being delivered or assessed • Can demonstrate current industry skills directly relevant to the training/assessment being undertaken • Continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.

Improvement Opportunities

It is suggested that the RTO:

- Develop a process for determining if equivalence has been met, e.g., a procedure and signing off by a responsible manager
- Redesigning the Matrix to ensure that meaningful information is collected, e.g., where worked when demonstrating the skill, dates and titles of professional development
- Redesigning the professional development form to ensure that it captures information against this Standard
- Better linking professional development with the requirements of this Standard
- Strengthen the link between performance management and professional development.

<p>ELEMENT 1.5 - Assessment including Recognition of Prior Learning (RPL): a) meets the requirements of the relevant Training Package or accredited course b) is conducted in accordance with the principles of assessment and the rules of evidence c) meets workplace and, where relevant, regulatory requirements d) is systematically validated.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Sample assessments (10 students) • RPL kit for CHC units • RPL kit for ACM units • Validation Record (sample) • Internal Validation Schedule – indicates that validation should occur in April and December this year for the two Qualifications reviewed. • Validation Schedule (VCAL) • Validation Schedule (CGEA) • Validation and Moderation Policy and Procedure • Assessment Validation Record – Certificate II in Animal Studies 14 May 2020 • Validation sample documents from Prickly2Sweet software (matrix, Criteria Analysis, Rectification Table for CHCDIV001) • EDCV Compliance Report – CHCDIV001 • Training and assessment strategies: <ul style="list-style-type: none"> ○ CHC22015 Certificate II in Community Services [VETDSS – Part-time] ○ ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] ○ ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] 	

CHC22015 Certificate II in Community Services

CHCCOM001 Provide first point of contact

- Assessor Guide
- Mapping
- Assessment tool

CHCCOM005 Communicate and work in health or community services

- Mapping
- Assessment workbook
- Assessor Guide

ACM20117 Certificate II in Animal Studies

ACMGAS201 Work in the animal care industry

- Student Assessment Pack
- Training and Assessment Guide for Educator
- Mapping

ACMGAS204 Feed and water animals

- Assessment booklet – Student: Feeding Basics
- Assessment booklet – Student: Feeding Quantities
- Assessment booklet – Student: Project

- Assessor Guide 1
- Assessor Guide 2
- Assessor Guide 3
- Mapping

Assessments

CHC22015 Certificate II in Community Services

CHCCOM001 Provide first point of contact

TAS indicates that the assessment methods are observation, questioning and written reports.

The unit of competency requires evidence of providing information to 3 people with multi faceted needs, collecting and documenting information for 3 people, using communication and problem-solving skills at least once for 3 people (demonstrating aggressive behaviour, distressed, cognitive impairment). The assessment if not in the workplace requires simulation that reflects workplace conditions, such as use of suitable facilities, equipment and resources, modelling of industry operating conditions and contingencies, including: interactions with people and co-workers from a range of diverse backgrounds, interactions with people displaying aggression, distress and cognitive impairment and typical workplace reporting processes

Assessment:

- Assessment task 1 – requires candidates to prepare a name tag, prepare a proforma to record interviews, and requires the candidates to determine and document what the needs are. They are not provided with the details from the assessor of the set of needs of these 3 people and therefore requiring the candidate to collect and document information for these 3 people. Questions 15–21 require the candidate to answer questions. In some instances, the candidates are directed to the text book and therefore this is more of a search and find activity rather than demonstrating understanding of the knowledge.
- Assessment task 2 – there are to be 3 simulated activities and observation sheets for the 3 people demonstrating certain behaviours (aggressive/distressed/cognitive). Instructions to the participants are extensive; however, the candidates need to develop their own people/character profiles. Observation checklists are essentially the performance criteria re-worded slightly and with additional prompts.

It is not made clear whether Task 1 and Task 2 are linked. Conditions for assessment, e.g., time allocation are not made clear.

Assessor Guide provides some guidance especially for Assessment Task 1 as to how the written forms are to be completed, but these are examples and it is unclear whether they are benchmarks or exemplars.

The simulated tasks do not ensure that the requirements of the unit of competency (the conditions) can be met. For example, whose industry operating conditions are they utilising. Other conditions for assessment, e.g., time allocation, are not made clear.

Mapping does not support demonstration of competence. For example, Task 1 Questions 9 and 10 ask the candidate to circle whether their client demonstrated aggressive/distressed/cognitive impairment and write how they managed the person. This is not a demonstration of an individual's ability using appropriate communication skills.

There are no decision-making rules for successful completion of tasks or of the unit. The tasks in some respects are unfair as they ask the candidates to develop their own scenarios before demonstrating performance. As there are no decision-making rules it cannot be supported that the assessment is valid or reliable. Validity and reliability of assessment is severely compromised.

Session plan indicates that the time devoted to Assessment Task 2 is undertaken over 2 sessions; 4 hours and 20 minutes. However, the session plan does not include time allocated to assessment of a role play dealing with a distressed person (only a practice session). Regardless, it is difficult to see how an assessor can individually observe in this time 15–16 students completing 3 role plays each.

Student sample (x 5) indicated:

- Evidence for the first part of Assessment 1 was not filed (Q 1–14), and only rudimentary ticks against the list of tasks the student was to undertake (x #1 student).
- Assessment 2: Observation Checklist – of a person with impairment. File note #1 student indicates that the role play did not occur as the candidate had previously completed a simulated interview with a person with a cognitive impairment for *CHCCOM005 Communicate and work in health or community services*. Mapping does not indicate that evidence is collected from performance in other units.

CHCCOM005 Communicate and work in health or community services

TAS indicates that the assessment methods are observation, questioning and written reports.

Unit of competency requires demonstration of effective communication in 3 different work situations, clarification of workplace instructions and negotiated timeframes with 2 colleagues, responding appropriately to 3 different situations where communication constraints were present, and completing 2 written or electronic workplace documents to organisation standards. If not demonstrated in the workplace, the tasks must be demonstrated in a simulated environment that reflects real working conditions by modelling

industry operating conditions and contingencies, as well as using suitable facilities, equipment and resources. There were no style guides or similar to advise candidates of the requirements or protocols for completing workplace forms.

Assessment:

- Assessment task 1 – written assessment requires the candidate to answer a series of questions and to complete 2 written or electronic documents ‘to organisational standards’. There are 26 questions that are based on knowledge checks, some which are search and find activities from the text book, which do not demonstrate that the candidate can interpret and apply the knowledge. The final two questions require the candidate to complete a code of conduct document and add 10 categories, and then complete a file note once the interview role plays are completed (refer to task 4). The Assessor Guide provides sample answers, but for extended responses it is unclear whether these are benchmark answers or exemplars. Candidates are not provided with an organisational style guide, protocols or similar.
- Assessment task 2 – written assessment requires the candidate to answer a series of questions (34). Most of these are knowledge checks and candidates are referred to their Learner Guide for help with the answers. The Assessor Guide provides expected responses, and for extended responses it is not clear if these are exemplars or benchmark responses.
- Assessment task 3 – written, requires the candidate to answer questions (8) in relation to a specific agency or their ‘own community agency developed in class’. It is unclear whether this simulated agency is sufficient for the purpose. The Assessor Guide provides expected responses, and for extended responses it is not clear if these are exemplars or benchmark responses.
- Assessment task 4 – role play and observation task, requires the candidate to complete 3 role plays. The candidate is to explain the ‘agency’s’ code of conduct and get the person to sign the form. They are to have 3 situations where communication constraints are present (e.g., cognitive impairment, hearing impairment, vision impairment). The candidate will also explain various services and clarify any questions. The task indicates that: ‘The role play scenarios will be discussed with students on a date to be decided’. It notes that: ‘the teacher and other students will play the role of other work colleagues’, which is potentially confusing as the instructions also refer to the candidate negotiating timeframes with two work colleagues. No further advice to the assessors is provided. Observation checklists are essentially the performance criteria re-worded slightly and with additional prompts.

Conditions for assessment, e.g., time allocation are not made clear. The simulated tasks do not ensure that the requirements of the unit of competency (the conditions) can be met, which puts at risk validity of decisions.

There are no decision-making rules for successful completion of tasks or of the unit. As there are no decision-making rules it cannot be supported that the assessment is valid or reliable. Validity and reliability of assessment is severely compromised.

Session plan indicates that the time devoted to Assessment Task 4 (and completing file note for Task 2) is 2 hours. It is difficult to see how an assessor can individually observe 15–16 students completing 3 role plays each in this time.

Student sample (x 4) indicated:

- Sign off sheets indicate that all the role plays were all conducted on the same day x #1 student, the same day 2 written assessments were signed off.
- Sign off sheets indicate that all the role plays were all conducted on the same day x #2, #3, #4 student.

ACM20117 Certificate II in Animal Studies

ACMGAS201 Work in the animal care industry

TAS indicates that the assessment methods are written assessment and practical observation.

This unit requires demonstration that the individual has worked effectively and safely in the animal care industry, including:

- Carried out routine animal care work routines with three different animals, showing consideration to animal care needs in an ethical and humane manner
- Complied with relevant legislation, regulations and codes of practice, including animal welfare and WHS legislation
- Communicated effectively with supervisor and other staff using industry-appropriate terminology
- Followed task instructions to complete work activities.

Assessment must take place under the following conditions:

- An environment that accurately reflects a real workplace setting
- With resources, equipment and materials including: a range of animals; equipment and resources appropriate to work undertaken in an animal care environment
- With access to organisational policies and procedures; and current WHS and animal welfare legislation and regulations
- Including relationships (internal and/or external) such as: interactions with supervisor and interactions with team members.

Assessment included:

Task 1: – 3 questions pertaining to what you would ask an employer about successful employees, describe how personal behaviour impacts on the workplace, and list 3 examples of legislation that govern the Companion Animal sector. Assessor Guide included what is looked for in the answer.

Task 2: – requires the candidate to research 3 organisations in the Companion Animal industry and complete the form provided (x3). Assessor Guide included 4 expectations in the response.

Task 3: – requires the candidate to complete an animal identification sheet for a native mammal, farm mammal, and a companion mammal. Assessor Guide included expected areas for response.

Task 4: – requires the candidate to produce an A4 poster or an A4 advertisement that informs new employees, and prepare an A4 poster or an A4 newspaper article on welfare issues. Assessor Guide indicates that the posters are to 'have all the criteria covered'. It is unclear what this means.

Task 5: – observation (x2). This assessment is undertaken either at an incursion/excursion or a workplace, and the candidate has two hours. Observation 1 requires the candidate to walk around the workplace and complete a table, e.g., list five policies and procedures for this organisation. The observation is accompanied by an Observation Checklist which merely records the outcome against the table questions/actions. Observation 2 requires the candidate to demonstrate their skill and knowledge of cleaning the housing, exercise, and interacting with two different animals. A table is provided with questions/prompts, e.g., what resources are commonly used to clean the housing and demonstrate how they are used? The observation is accompanied by an Observation Checklist which merely records the outcome against the table questions/actions. Assessor Guide indicates that this is an individual task and may take place over one or more workplaces – or simulated workplaces. Candidate is to demonstrate 'all criteria listed in this assessment'.

There is no advice how to simulate a workplace, nor that the simulation includes all the required conditions. The observations are not observations of a candidate's performance, but are written tasks. The assessment does not meet the performance evidence or the conditions of the unit.

Session plan indicates that Task 5 is completed in approximately 2.5 hours for 15–17 students x 2 observations. If the assessment task was indeed an observation, how the number of students can be individually observed and assessed for this task in the time allowed does not appear logical.

There are no decision-making rules for successful completion of tasks or of the unit. As there are no decision-making rules it cannot be supported that the assessment is valid or reliable. Validity and reliability of assessment is severely compromised.

Student sample (x 5) indicated:

- All assessments indicated evaluation by the assessor
- Task 1 – For some students, for the knowledge check not all questions were answered correctly, but the task was considered successfully completed, confirming that there are no clear decision-making rules
- Task 5 – assessor notes in feedback to students that this is a research activity.

ACMGAS204 Feed and water animals

TAS indicates that the assessment methods are verbal assessment and practical observation.

The unit of competency requires the candidate to demonstrate feeding and watering a minimum of two different animals, covering two different species, in line with the animal's feeding plan. Assessment must occur under the following conditions:

- An environment that accurately reflects a real workplace setting
- A range of animals
- Equipment and resources appropriate to work undertaken in an animal care environment
- Access to organisational policies and procedures, animal feeding plans
- Including interactions with a supervisor.

Assessment:

Task 1: – written assessment that requires candidate to answer 17 questions and to be completed in their own time (there is no advice as to how to confirm authenticity). Questions and answers with some extended responses. Some questions are not quantified, e.g., What types of food should you feed the following types of feeders? Or List all of the equipment you would use. Assessor Guide provides expected responses or suggested answers which do not provide sufficient advice to the assessor as to the expected level of response required. For extended responses, it is not clear whether the expected response is a benchmark or an exemplar.

Task 2: – requires 14 questions to be responded to against a feed plan, focussing on interpreting and calculating feeds. To be completed in their own time (there is no advice as to how to confirm authenticity). Assessor Guide includes correct answers.

Task 3: – requires the candidate to arrange access to a companion animal for a period of 7 consecutive days and provide food and water and maintain the housing and living conditions for the animal and record all activities and record observations of animal behaviour. The task requires some forms to be completed and also photographs to be taken of the candidate undertaking the activities (a list of activities is provided). Example of responses in tables is provided, but these provide little support to the assessor in determining level of performance. For determining sufficiency of the photographs, the list provided to the student is the same used by the assessor.

Task 3, which would be the key assessment to satisfy the performance evidence, is inadequate as it only addressed 1 animal and it cannot be ascertained how the simulation met all the conditions listed in the unit.

There are no decision-making rules for successful completion of tasks. Candidates are to complete all tasks satisfactorily for completion of unit. Validity and reliability of assessment is severely compromised.

Student sample (x 4) indicated:

- All assessments indicated evaluation by the assessor
- A student allowed to resubmit, not all assessments are included in the booklet
- 2 students had photographs attached for Assessment 3.

Validation

Validation and Moderation Policy and Procedure:

- Defines validation and moderation. Moderation is about bringing decisions made into alignment, and would result in candidate results being changed.
- Indicates that the Compliance Curriculum Team monitors the schedule
- Indicates that each department has a Validation Schedule and notes that it involves the review of assessment materials
- Indicates that moderation involves the review of completed assessment tasks – but does not refer to a schedule

There is no document to describe the validation process, how units are selected and the methodology for selecting and reviewing completed student assessments.

The Validation Record does not allow for the recording of review of completed assessments and any issues arising, and indicates that there is one validator undertaking the task.

Interview with the CEO and Compliance Officer indicated that the RTO is looking at using validation software next year and also employing a new staff member to manage the validation process. The Compliance Officer indicated that internal validation has occurred, and also reviewing of completed student assessments. Moderation, which in the RTO terms involves looking at student assessment with other providers, did not happen this year.

RPL

RPL kits provide extensive advice to candidates, including self-assessment, third party reports, and observation in the workplace by the assessor. However, these kits are collection devices and do not provide advice to the assessors as to decision-making rules. Checklists for observation have not been populated – and therefore it is not a completed assessment tool.

Interview with CEO and Compliance Officer indicated that there have been no known RPLs in the recent past.

SF.1.5.1 Finding

Required Rectification(s)

CHC22015 Certificate II in Community Services

CHCCOM001 Provide first point of contact

CHCCOM005 Communicate and work in health or community services

The Assessment tools did not ensure valid and reliable decisions as:

- Observation checklists were essentially the performance criteria and did not elicit sufficient evidence to be collected
- Assessment did not meet the conditions of assessment or satisfy the requirements of the performance evidence
- There were no decision-making rules for the successful completion of tasks or unit
- Time allocation for simulated assessment was impractical.

Validity and reliability of assessment is severely compromised.

The RTO is to review and revise assessment tools to ensure that they meet the requirements of the whole unit of competency and will enable valid and reliable decisions to be made.

SF.1.5.2	Finding	Required Rectification(s)
	<p>ACM20117 Certificate II in Animal Studies <i>ACMGAS201 Work in the animal care industry</i> <i>ACMGAS204 Feed and water animals</i> The Assessment tools did not ensure valid and reliable decisions as:</p> <ul style="list-style-type: none"> • Observation checklists were essentially the performance criteria and did not elicit sufficient evidence to be collected • Assessments were not conducted in an environment that accurately reflects a real workplace setting, including a range of animals • Assessment did not meet the conditions of assessment or satisfy the requirements of the performance evidence • There were no decision-making rules for the successful completion of tasks or unit • Time allocation for simulated assessment were impractical. <p>Validity and reliability of assessment is severely compromised.</p>	<p>The RTO is to review and revise assessment tools to ensure that they meet the requirements of the whole unit of competency and will enable valid and reliable decisions to be made.</p>
	<p>SF.1.5.3 Finding</p> <p>RPL: The RTO does not have a robust process to manage the decision-making processes in the RPL assessment tools.</p>	<p>Required Rectification(s)</p> <p>The RTO is to revise the RPL assessment tools to ensure that it is clear what level of performance is required to inform the decision-making process of the assessor.</p>
	<p>SF.1.5.4 Finding</p>	<p>Required Rectification(s)</p>

<p>Validation: The RTO process for validation is not clear and does not include the evaluation of completed student assessments to improve assessment. The RTO has not demonstrated systematic implementation of validation of assessment.</p>	<p>The RTO is to:</p> <ul style="list-style-type: none"> • Review and revise its processes in regards to the validation of assessment (involving the review of the assessment tools and completed student assessments), including the methodology for unit selection and the methodology for student assessment sampling • Demonstrate implementation of validation and actioning of any improvements.
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<p>Improvement Opportunities</p>
<p>The RTO would improve the Validation and Moderation Policy and Procedure by deleting moderation as it is a term no longer used in the VET sector.</p>

2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • PTR and Enrolment Policy and Procedure • Student sample files (x 10) <p>PTR and Enrolment Policy and Procedure indicates:</p> <ul style="list-style-type: none"> • That applicants will undertake an LLN and Digital IT assessment and complete a Pre-training review form and Pre-training interview • That applicants are asked to self-declare any disabilities/language requirements • Course information is provided through an information session where the learners are introduced to the course and its outcomes. • One-on-one Pre-training interview where relevant documents can be presented, e.g., for Credit Transfer. At this point Oral LLN can be assessed and recorded on the Pre-training Review Online Form <p>Specifically, the procedure refers to these steps in sequence:</p> <ol style="list-style-type: none"> 1. Initial contact, interview time made and applicants sent to the LLN Robot and Digital Literacy Quiz. Presumably they complete this in their own time. 2. School referral (NSSSP students) 3. LLN and Digital Literacy test completed – must be completed by all learners prior to enrolment 4. Pre-training review – which includes completion of forms and any required documents to be supplied, and assessing the oral literacy of the applicant 5. Enrolment/VET registration – provided as an online facility 6. Registration receipt – an internal check by the RTO 7. Learner data entry and Learner Course enrolment data entry – AVETMISS data entry by the RTO 8. Letter of offer, timetable and enrolment statement of fees 9. Invoicing. 	

Student sample files

10 students' files included LLN assessment, Pre-training review and enrolment forms. The LLN assessment notes that Course Level requirements for learning, reading, writing, oral communication and numeracy against an ACSF level. However, this information is not included in the TASs. In terms of digital literacy not all files included an assessment of this domain, some included a reference to completing an IT digital literacy test on Survey Monkey but results were not recorded e.g., Madelyn Johnston. Files indicate that the applicants are provided with the Enrolment Pack on acceptance, and must complete the enrolment forms and enrolment pack prior to enrolment day.

Improvement Opportunities

The RTO needs to ensure that all details are recorded in the Pre-training review.

2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Continuous Improvement Policy • Continuous Improvement Procedure • Procedure for Continuous Improvement, Internal Auditing and Risk Management • Admin Continuous Improvement Register 2020 • Adult Education Continuous Improvement Register • Continuous Improvement Register • FLC 2020 vetregQualsIndicators • Email dated 26/6/2020 to the VRQA regarding the 2019/20 Quality Indicator report • NH & Comm ED Continuous Improvement Register 2020 • Youth Education Continuous Improvement Register 2020 • Internal Audit Spreadsheet • Email providing the spreadsheet to Board of Management 7/10/2020 • Sample partial Nash audit report for funding contract • Sample partial Nash audit report for AQTF and VTQA Guidelines <p>Continuous Improvement Policy indicates:</p> <ul style="list-style-type: none"> • That feedback is collected through AQTF learner and employer survey forms • That the RTO records and evaluates feedback both manually and on Novocare system. Action is taken to rectify issues. 	

- That external moderation is undertaken.

Continuous Improvement Procedure indicates:

- Refers to the feedback collected through the AQTF learner and employer survey forms – which are to be issued before the end of each course. There is no advice as to when and how the report is to be sent to the VRQA
- Feedback is sought from staff meetings, manager meetings, tutor meetings and communications through email or written documentation
- The system allows for four stages of actions that must be applied (short- or long-term action, action final taken, preventative action). Novocare designates the responsibilities and timelines
- Feedback is sought from employers in the Youth Department
- A moderation/validation schedule is compiled each year and makes reference to a Continuous Improvement of Education and Training Procedure (not sighted).

Procedure for Continuous Improvement, Internal Auditing and Risk Management:

- Indicates internal audits will be conducted annually against the AQTF (but does not mention the VRQA Guidelines), and the funding contract. Actions will be documented and timelines set. Reports are to be forwarded to the CEO for review.
- Indicates student and employer questionnaires are to be conducted on the completion of program/course
- Refers to additional surveys and feedback, noting that feedback from staff is obtained in a range of ways
- Indicates that assessment is externally validated, and student performance is externally moderated
- Indicates that monitoring and analysis of student results and data will be used to identify trends and facilitate improvement in retention and progression rates. It does not indicate how this will be done and when. Interview with the Compliance Officer indicated that reviewing data and actioning intervention strategies is undertaken at meetings (e.g., Youth, VETiS) and aims to identify students at risk and that a plan is worked out with the Wellbeing team and may include meetings with parents and home school.

Internal Audit Spreadsheet related to Skills First contract criteria but did not include any aspects of the audit against the AQTF or the VRQA Guidelines.

VRQA Quality Indicators report 22/6/2020 sighted. Email to VRQA notes submission 29/6/2020.

Registers

There are 5 different registers. Interview with the Compliance Officer indicated that the multiple registers were introduced this year for each department, to better identify issues and to be able to be able 'to drill down on what each department is doing'.

Registers indicated the source of the improvement, but not who is responsible as noted above, nor timelines, other than when task is completed. Continuous Improvement Register indicates that there was an internal audit conducted by Nash Training in March 2020 and that the report went to the Board of Management. It is unclear whether this was an AQTF/VRQA Guidelines audit and/or a funded audit against the Skills First contract. There is no indication as to when the actions identified in this report were completed.

There was no evidence in the registers related to the findings of the AQTF client survey and actions to be taken.

The RTO has implemented sufficient strategies by collecting, analysing and acting upon relevant data and continuously improves client services.

<p>2.3 - Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • PTR and Enrolment Policy and Procedure • Student sample files (x 10) • Student Handbook v1.10 • Enrolment pack Youth • Enrolment pack VETiS • Training plans (x 10) • Interview with CEO and Compliance Officer <p>PTR and Enrolment Policy and Procedure indicates:</p> <ul style="list-style-type: none"> • That applicants will undertake an LLN and Digital IT assessment and complete a Pre-training review form and Pre-training interview • That applicants are asked to self-declare any disabilities/language requirements • Course information is provided through an information session where the learners are introduced to the course and its outcomes. • One-on-one Pre-training interview where relevant documents can be presented, e.g., for Credit Transfer. At this point Oral LLN can be assessed and recorded on the Pre-Training Review Online Form <p>Specifically, the procedure refers to these steps in sequence:</p> <ol style="list-style-type: none"> 1. Initial contact, interview time made and applicants sent to the LLN Robot and Digital Literacy Quiz. Presumably they complete this in their own time. 2. School referral (NSSSP students) 	

3. LLN and Digital Literacy test completed – must be completed by all learners prior to enrolment
4. Pre-training review – which includes completion of forms and any required documents to be supplied, and assessing the oral literacy of the applicant
5. Enrolment/VET registration – provided as an online facility
6. Registration receipt – an internal check by the RTO
7. Learner data entry and Learner Course enrolment data entry – AVETMISS data entry by the RTO
8. Letter of offer, timetable and enrolment statement of fees
9. Invoicing.

There is nothing in the PTR and Enrolment Policy and Procedure which indicates clearly how the RTO informs applicants about the training, assessment and support services to be provided, and about their rights and obligations before they enrol or enter into an agreement.

Enrolment packs

Include forms that must be completed.

Student Handbook

Handbook:

- Identifies the RTO legal name and number
- Makes statements about cancellation of courses that are contradictory, e.g. implies that a \$50 fee applies to withdraw but that a full refund of money will be given (p. 11)
- Disciplinary action
- Notes that student enrolment and result records are retained for 30 years, which is not an accurate reflection of the procedure
- Indicates that the VRQA requires the retention of student work

- Indicates that there is a first aid officer on site at all times
- Indicates that WWC checks are required for some placements
- 80% attendance is required
- Indicates that there is a wellbeing team available – and that students have access to career pathway and guidance, and provides some links to external services. It is not clear what services are provided.
- Child safe commitment
- Code of conduct
- Students complaints, grievances and appeals
- Plagiarism and cheating
- Use of equipment
- Relevant legislation; however, links to AQTF and VET industry are not relevant to these
- Assessment (p. 13)
- Does not provide information in relation to competency-based training and assessment
- Limited information (other than withdrawal, refund and complaints process, reassessment) about their rights.

Student sample files

Files indicate that the applicants are provided with the Enrolment Pack on acceptance, and must complete the enrolment forms and enrolment pack prior to enrolment day. A code of conduct is included in this pack.

Enrolment forms: Of the 10 files; 2 had incorrect Qualification titles that were not VET recognised training titles, 3 had truncated titles, 1 had no Qualification code, and only 4 were accurately entered.

Training Plans

Training Plans were signed and dated. Training Plan includes whether individual learning strategies/needs are required.

Interview with CEO and Compliance Officer

Interviewees indicated:

- That an individual Training Plan is used for each student and this is signed at the first day of class, and would be the agreement.
- All students go through the pre-training review interview and this is where they are taken through the Enrolment Pack and any key details in the Handbook. The Handbook is also noted at the first point of contact and they are referred to the website. The Enrolment Pack includes a Youth Enrolment Checklist to be completed by the Staff member conducting the enrolment. There is an item that they are to confirm that they have 'advised of student handbook (online)'.

Note that:

- The signing of the Training Plan is after students have filled out their enrolment form and may have paid fees.
- The Enrolment Checklist only confirms that the student has been advised, and does not indicate that the student has been fully informed or declares they have read and understood key aspects of the Handbook.

SF.2.3.1	Finding	Required Rectification(s)
	<p>The RTO has not ensured that the applicant has been fully informed about the training, assessment and support services to be provided, and about their rights and obligations – prior to enrolment or payment of fees.</p>	<p>The RTO is to demonstrate that it has adjusted its onboarding processes to ensure that applicants are fully informed about the training, assessment and support services to be provided, and about their rights and obligations – prior to enrolment or payment of fees.</p>

<p>2.4 - Employers and other parties who contribute to each learner’s training and assessment are engaged in the development, delivery and monitoring of training and assessment.</p>	<p>Not audited</p>
<p>Evidence/Documentation Reviewed</p>	
<p>The RTO has determined for these two qualifications, that at this time there is minimal engagement with employers.</p>	

2.5 - Learners receive training, assessment and support services that meet their individual needs.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Student Learning Outcomes and Welfare Policy [superseded] • Student Learning Outcomes and Welfare Services Policy and Procedure • Wellbeing Referral List – which is merely a list of external resources • Youth Wellbeing Policy • Student Handbook • AQTF survey report 2020 – does not provide any feedback on student satisfaction with the level of support services provided by the RTO <p><u>Student Handbook</u></p> <p>Handbook:</p> <ul style="list-style-type: none"> • Identifies the RTO legal name and number • Indicates that there is a first aid officer on site at all times • Indicates that there is a wellbeing team available – and that students have access to career pathway and guidance, and provides some links to external services. It is not clear what services are provided. <p><u>Youth Wellbeing Policy</u></p> <p>Policy:</p> <ul style="list-style-type: none"> • Indicates that the RTO implements a flexible learning framework • Wellbeing staff support educators and also support a culture of emotional, social and physical wellbeing 	

Student Learning Outcomes and Welfare Policy

Policy:

- Is stamped – Out of Date.
- Indicates the RTO is committed to providing a safe and supportive environment, including welfare support, pathway and transition advice and supporting access to professional services.

Student Learning Outcomes and Welfare Services Policy and Procedure-

The revised policy and procedure were provided at audit after the auditor queried the provision of an out-of-date policy.

This policy and procedure:

- Indicates hours of operation and classes
- Indicates FLC's commitment to providing a safe and supportive environment, including welfare support, pathway and transition advice and supporting access to professional services, and improving learning outcomes
- Outlines key strategies deployed by the RTO

Interview with CEO and Compliance Officer

The interviewees indicated two additional services:

- Child Safety Champions (2 staff members) who are responsible for reporting requirements, training, keeping the organisation current, disclosures.
- Training Plan – a Training Plan is developed for each individual, and is monitored by trainers in conjunction with the head of department and VETtrak administrators.

Improvement Opportunities

It is suggested that the RTO better document its services in the Student Handbook.

2.6 - Learners have timely access to current and accurate records of their participation and progress.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Student Handbook • Student Records and Results Policy and Procedure • Student Record Request Form <p><u>Student Records and Results Policy and Procedure</u> The policy and procedure notes:</p> <p style="padding-left: 40px;"><i>Students can access their records and results through method of booking an appointment with the Head of Department – or for VCAL through contacting the VCAA</i></p> <p>Limitations about the access, e.g., able to view only are mentioned.</p> <p><u>Student Handbook</u> Student Handbook (p. 14) indicates the following:</p> <p style="padding-left: 40px;"><i>Foundation Learning Centre maintains individual files and database records for each student. All records are kept in a secure environment. Access to files and records is limited to staff involved in their maintenance.</i></p> <p>Student Handbook does not reference the Student Records and Results Policy and Procedure. However, the policy and procedure can be found on the website.</p> <p><u>Student Record Request Form</u> This form is to be used by past students who wish to view their records.</p>		
SF.2.6.1	Finding	Required Rectification(s)
	Information pertaining to learner access to records is inconsistent. There is also no reason why VCAL must approach the VCAA when the VET records and participation records are maintained at RTO level.	The RTO is to provide consistent information to learners on their right to access or view their data.

<p>2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Complaints and Appeals Form • Complaints, Appeals and Grievance Policy and Procedure • Register of Complaints and Appeals <p>Complaints, Appeals and Grievance Policy and Procedure:</p> <ul style="list-style-type: none"> • Does not reference the RTO legal entity name or number • Defines the difference between a complaint (something that cannot be fixed immediately by the person), grievance (a complaint that cannot be resolved without input from others) and appeal (against a decision). • Complaints process: <ul style="list-style-type: none"> ○ Complaints and grievances are to be recorded on the form which is made available at reception, which is then forwarded to the CEO within 48 hours for action and follow up. ○ A meeting is to be arranged between the parties within 3 working days to discuss the course of action. ○ The parties will be informed within 10 working days of the outcome and the CEO is to record the communication. • Appeals process <ul style="list-style-type: none"> ○ Does not appear to follow on from the complaints process, as it refers to appealing to the trainer and may be a verbal exchange. ○ If felt that the appeal was not dealt with fairly, it can be lodged in writing with the Department Head within 5 working days. ○ Shall follow the complaints process. 	

- Grievance process:
 - Is not clearly explained; however, it does note that records will be kept of all grievances and steps taken to resolve them
 - Includes raising the grievance with Department Head or CEO or President of the Board or the Board of Management.
- Indicates that if the grievance is not resolved that an external party can be sourced.
- Indicates that there is potential to access advocacy services.
- Does not escalate to the VRQA.

SF.2.7.1	Finding	Required Rectification(s)
	<p>The complaints, grievances and appeals processes are inadequate as:</p> <ul style="list-style-type: none"> • They lack internal logic • Do not ensure natural justice for the applicant, for example, in the complaints process the parties must meet rather than the issue being investigated through individual interviews • Do not indicate how the applicant will be supported • Do not escalate to the VRQA. 	<p>The RTO is to revise the complaints and appeals processes to ensure that it is logical and includes natural justice principles.</p>

3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Student Contract • Enrolment form • Student files (x 10) • AQTF survey report 2020 – does not provide any feedback on student satisfaction with the level of support services provided by the RTO • Continuous Improvement Policy • Continuous Improvement Procedure • Admin Continuous Improvement Register 2020 • Adult Education Continuous Improvement Register • Continuous Improvement Register • FLC 2020 vetregQualsIndicators • NH & Comm ED Continuous Improvement Register 2020 • Youth Education Continuous Improvement Register 2020 • Enrolment form <p>Student Contract is a behaviour contract, as opposed to an agreement of client services, e.g., the Qualification and the support to be provided. The enrolment form could be considered an agreement; however, the enrolment form is more about AVETMISS data collection, and does allow for the recording of the intended course of study and the fee payable.</p>	

Interview with CEO and Compliance Officer

The interviewees consider that the Training Plan is the agreement, which includes an option to record the additional support or services to be provided beyond the Qualification.

Student files

Of the 10 files – 2 had incorrect Qualification titles that were not VET recognised training titles, 3 had truncated titles, 1 had no Qualification code, and only 4 were accurately entered. Training Plans were on file.

3.2 - The RTO uses a systematic and continuous improvement approach to the management of operations.	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Continuous Improvement Policy • Continuous Improvement Procedure • Procedure for Continuous Improvement, Internal Auditing and Risk Management • Admin Continuous Improvement Register 2020 • Adult Education Continuous Improvement Register • Continuous Improvement Register • FLC 2020 vetregQualsIndicators • Email dated 26/6/2020 to the VRQA regarding the 2019/20 Quality Indicator report • NH & Comm ED Continuous Improvement Register 2020 • Youth Education Continuous Improvement Register 2020 • Internal Audit Spreadsheet • Email providing the spreadsheet to Board of Management 7/10/2020 • Sample partial Nash audit report for funding contract • Sample partial Nash audit report for AQTF and VTQA Guidelines <p>Continuous Improvement Policy indicates:</p> <ul style="list-style-type: none"> • That feedback is collected through AQTF learner and employer survey forms 	

- That the RTO records and evaluates feedback both manually and on Novocare system. Action is taken to rectify issues.
- That external moderation is undertaken.

Continuous Improvement Procedure indicates:

- Refers to the feedback collected through the AQTF learner and employer survey forms – which are to be issued before the end of each course. There is no advice as to when and how the report is to be sent to the VRQA.
- Feedback is sought from staff meetings, manager meetings, tutor meetings and communications through email or written documentation
- The system allows for four stages of actions that must be applied (short- or long-term action, action final taken, preventative action). Novocare designates the responsibilities and timelines.
- Feedback is sought from employers in the Youth Department
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- Indicates student and employer questionnaires are to be conducted on the completion of program/course
- Refers to additional surveys and feedback, noting that feedback from staff is obtained in a range of ways
- Indicates that assessment is externally validated, and student performance is externally moderated
- Indicates that monitoring and analysis of student results and data will be used to identify trends and facilitate improvement in retention and progression rates. It does not indicate how this will be done and when. Interview with the Compliance Officer indicated that reviewing data and actioning intervention strategies is undertaken at meetings (e.g., Youth, VETiS) and aims to identify students at risk and that a plan is worked out with the wellbeing team and may include meetings with parents and home school.

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There was no evidence in the registers related to the findings of the AQTF client survey and actions to be taken.

Closing meeting interview with CEO and Compliance Officer

Interview confirmed that the Internal Audit undertaken by external consultants, Nash Training, did address the AQTF and the VRQA Guidelines. At the Closing Meeting additional evidence was provided that this was the case.

SF.3.2.1	Finding	Required Rectification(s)
	<p>Given the issues embedded in this report, the systems established, including internal audit, have not ensured a systematic and continuous improvement approach to the management of operations.</p>	<p>The RTO needs to implement a robust process to ensure that it implements a systematic continuous improvement approach to the management of the operations.</p>

<p>3.3 - The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.</p>	<p>Not applicable</p>
<p>Evidence/Documentation Reviewed</p>	
<p>The RTO has declared that it has no third-party arrangements.</p>	

3.4 - The RTO manages records to ensure their accuracy and integrity.	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Student Records and Results Policy and Procedure • Student files (x 10) <p>Student Records and Results Policy and Procedure indicates:</p> <ul style="list-style-type: none"> • That the purpose relates to the processes for documenting and recording results upon completion of units • That all educators are to submit all assessment material to the compliance team for review • Student progress is to be monitored • Assessors are to award results against assessment and deem satisfactory or non-satisfactory • All assessment results are to be listed in the student assessment material and assessment results recorded on summary records • Recording of results is to be on individual Training Plans and the data entered in the management system, and then onto VASS for VCAA students • Student data is collected through the enrolment form • Student records are securely stored and only accessible to educators, wellbeing staff and administration staff responsible for data entry. <p>There is no information documented as to how records are checked for accuracy and integrity.</p> <p><u>Interview with CEO and Compliance Officer:</u> Interview indicates that there is a process to check and confirm student outcomes. Student trackers are used (which are spreadsheets that all educators have access to on Sharepoint). Once staff have signed off workbook, data goes onto a student tracker before changes are made to the Training Plan. The Lead Educator is responsible for checking that the tracker and Training Plan are accurate. All documents are passed through the Lead Educator and Head of Department and ultimately the Compliance Unit. Random checking of documents is undertaken at each stage to identify any issues. Some departments have weekly meetings and some are monthly where there is tabled discussion for checking progress. Interviewees indicated that it is a proactive process with close monitoring.</p>	

Student sample files

Enrolment forms: Of the 10 files; 2 had incorrect qualification titles that were not VET recognised training titles, 3 had truncated titles, 1 had no qualification code, and only 4 were accurately entered.

SF.3.4.1	Finding	Required Rectification(s)
	The RTO has not ensured that the Enrolment Form collects accurate information.	The RTO is to demonstrate that it has adjusted its processes to ensure that Qualification titles are accurately recorded on the Enrolment Form.

Improvement Opportunities

The RTO could better document the process for checking the integrity of records in their procedure.

Detailed Findings – 2016 VRQA Guidelines for VET Providers

GUIDELINE 1.1 - An RTO must ensure that it has a current strategic plan and a detailed business plan which have been approved by its governing body.

- a) An RTO ensures the strategic plan details the overall vision, mission, board of directors and strategic directions of the RTO and clearly indicates that provision of vocational education is a primary purpose of the RTO.
- b) An RTO ensures the business plan details the operational and workforce development arrangements for a three year period that incorporates:
 - i. description of the business including an organisation chart, courses, location(s) and facilities
 - ii. a continuous improvement plan or risk management strategy
 - iii. a work force development plan
 - iv. strategic alliances with other education or service providers or third party arrangements
 - v. training and assessment delivery including proposed facilities and delivery hours

**Not Audited in
Phase 2 audit**

GUIDELINE 1.2 - An RTO demonstrates its financial viability and its capacity to sustain quality VET into the future by ensuring it has a three year financial plan that includes:

- a) projected student enrolments by qualifications
- b) a range of financial indicators, including
 - i. cash flow
 - ii. current ratio of total current assets versus total current liabilities (equal to or greater than 1)
 - iii. debt ratio Total Liabilities/Total Assets (equal to or less than 1)
- c) the VET provider shows that it has a financial guarantor with the capacity to service the guarantee and/or to demonstrate sufficient working capital to operate for at least 6 months without tuition fees.
- d) details about whether any person involved in the management or provision of courses by the RTO meets any of the descriptions listed in section 4.3.11(2) of the Act.

**Not audited in
Phase 2 audit**

GUIDELINE 1.3 - An RTO ensures that it has management systems that include:

- a) management information including:
 - I. details of company incorporation in Australia (alternatively evidence of being an incorporated body in receipt of government funds)
 - II. a physical address of the company in Victoria for the purposes of serving notices
 - III. details of the directors, CEO/PEO and senior management members with associated police checks and Working With Children Checks if students are under 18 years of age
 - IV. confirmation that at least one Director or CEO/PEO has his/her principal residence in Victoria
 - V. contact arrangements for the CEO/PEO including during holidays and other closure periods
 - VI. a physical addresses for the location of financial, student and staff records including archives and computer back up storage
- b) a financial management system including a system for managing student fee payments and student refunds
- c) a student records management system that includes the capacity to provide the VRQA with AVETMISS compliant data and to ensure that copies of student records are
 - I. not able to be withheld from the RTO; and
 - II. able to be provided in electronic and print versions, at no cost to the VRQA in the event that the VET provider ceases operations
- d) a staff records management system including arrangements which ensure that for each staff member involved in training and assessment, the RTO holds verified documentation indicating each staff member's qualification and skills.

**Not audited in
Phase 2 audit**

GUIDELINE 1.4 - An RTO ensures that it has appropriate governance structures that includes:

- a) transparent governance and ownership arrangements, such as a Board of Directors, governing council, executive management and academic management
- b) a governance structure that includes appropriate appointments of persons for oversight of academic/educational integrity and quality assurance, such that:
- c) for an RTO with anticipated ongoing operation of less than 150 equivalent full time students or an annual student fee turnover of less than \$1.5m per annum, persons are appointed with suitable qualifications and experience; and
- d) for all other RTOs, a governance committee is established that includes individuals who are independent of the RTO's ownership and are employed with suitable qualifications and experience
- e) a CEO/PEO and members of the RTO's senior management team with appropriate qualifications and educational experience.

**Not audited in
Phase 2 audit**

<p>GUIDELINE 2.1 - An RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.</p> <ul style="list-style-type: none"> f) A third party means any party that provides services on behalf of the RTO but does not include a party to a contract of employment with the RTO. g) Services mean training, assessment, related educational or support services and/or any activities related to the recruitment of prospective students, but does not include student counselling, mediation or ICT support services. 	Not Applicable
<p>GUIDELINE 2.2 – An RTO ensures that any third party delivering services on its behalf is required, under a written agreement, to cooperate with the VRQA:</p> <ul style="list-style-type: none"> h) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and i) for the purposes of the conduct of any audit or monitoring of its operations. 	Not Applicable
<p>GUIDELINE 2.3 – An RTO notifies the VRQA of any written agreement entered into under Guideline 2.2 for the delivery of services on its behalf:</p> <ul style="list-style-type: none"> j) within 30 calendar days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and k) within 30 calendar days of the agreement coming to an end. 	Not Applicable
<p>GUIDELINE 2.4 – Information, whether disseminated directly by an RTO or by another party on its behalf, is both accurate and factual, including by:</p> <ul style="list-style-type: none"> l) clarifying whether a third party is recruiting prospective students for an RTO on its behalf; and m) distinguishing where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party. 	Not Applicable

GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO provides, in print or through referral to an electronic copy, current and accurate information that:

- n) enables the student to make informed decisions about undertaking training with the RTO and
- o) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf

Not Applicable

GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, including in relation to any relevant changes to existing or new third-party arrangements or changes in ownership.

Not Applicable

GUIDELINE 2.7 - An RTO has a complaints policy to manage and respond to allegations involving the conduct of:

- p) the RTO, its trainers, assessors or other staff;
- q) a third party providing services on the RTO's behalf, its trainers, assessors or other staff; or
- r) a student of the RTO.

Not Applicable

GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, made by an RTO or a third party providing services on the RTO's behalf.

Not Applicable

<p>GUIDELINE 3.1 In addition to the requirements specified in Guidelines 3.2 and 3.3, an RTO’s training and assessment is only delivered only by persons who have:</p> <ul style="list-style-type: none"> a) vocational competencies at least to the level being delivered and assessed; b) current industry skills directly relevant to the training and assessment being provided; and c) current knowledge and skills in vocational training and learning that informs their training and assessment. <p>Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Induction and Professional Development Policy • 3 staff files <p>Refer to evidence listed in Standard 1.4.</p> <p>CHC22015 Certificate II in Community Services</p> <p>Allan Snashall: This trainer did not demonstrate:</p> <ul style="list-style-type: none"> • Current industry skills directly relevant • Current knowledge and skills in training and assessment. <p>Kate MacMillan: This trainer did not demonstrate:</p> <ul style="list-style-type: none"> • Current knowledge and skills in training and assessment. 	

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Melissa Plant:

This trainer did not demonstrate:

- Vocational equivalence
- Current industry skills directly relevant
- Current knowledge and skills in training and assessment.

GF 3.1.1	Finding	Required Rectification(s)
	Refer to Standard 1.4.	Refer to Standard 1.4.

<p>GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<ul style="list-style-type: none"> • Induction and Professional Development Policy • 3 staff files <p>Refer to evidence listed in Standard 1.4.</p> <p>CHC22015 Certificate II in Community Services Allan Snashall and Kate MacMillan both had the relevant Qualification.</p> <p>ACM20117 Certificate II in Animal Studies Melissa Plant had the relevant Qualification.</p>	

GUIDELINE 3.3 Where a person conducts assessment only, an RTO ensures that the person has the qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1 of these Guidelines.

Not audited

GUIDELINE 3.4 Where the RTO, in delivering training and assessment, engages an individual who is not a qualified trainer and/or assessor, the individual works under the supervision of a qualified trainer and/or assessor and must not determine assessment outcomes.

Not audited

GUIDELINE 3.5 An RTO ensures that any individual working under the supervision of a trainer:

- s) holds the skill set defined in Item 4 of Schedule 1 of these Guidelines;
- t) has vocational competencies at least to the level being delivered and assessed; and
- u) has current industry skills directly relevant to the training and assessment being provided.

Not audited

<p>GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>CHC22015 Certificate II in Community Services [VETDSS – Part-time] ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery]</p> <ul style="list-style-type: none"> • Training and assessment strategies • Session plans • Assessment tools <p>C CHC22015 Certificate II in Community Services [VETDSS – Part-time] TAS indicates:</p> <ul style="list-style-type: none"> • <i>'FLC VETDSS Department cohort is made up of a range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with the [sic] requirements of "Specialist School" therefore enabling the need to maintain some face-to-face training for those students deemed 'vulnerable'.'</i> • Target group is those in years 10, 11 or 12 VCE or VCAL program • That there are no entry requirements • Classes are to run for 5.5 hours one day a week for 34 weeks (= 187) • Notes the amount of training as: 30 hours simulated workplace assessments, 151 hours facilitated activities, 5 hours workplace learning and assessment monitored by assessor = 186 hours. Volume of learning has in addition unstructured hours including 79 hours private study and 20 hours work placement = 99. The total number of hours of structured and unstructured learning is 285 hours. Note that this includes 20 hours of placement plus 5 hours of assessor at the placement which is inflating the figure. Note that with the volunteering unit removed from the TAS this information is now not accurate. Volume of learning is designed to align with the nominal hours. 	

- The time allocation for assessment tasks (to be simulated in class) did not provide for sufficient time nor meet the conditions of assessment for a simulated work environment.

ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] TAS indicates:

- *'FLC VETDSS Department cohort is made up of a diverse range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with [sic] the requirements of "Specialist School" therefore enabling the need to maintain some face-to-face training for those students deemed 'vulnerable'.'*
- Target group is those in years 10, 11 or 12 VCE or VCAL program
- There are no entry requirements
- Delivery is to be conducted 1 day per week for 5.5 hours, over 2 calendar years. 68 weeks @1 x day face-to-face x 5.5 hours (374 hours). Independent study may be required on individual students needs and industry experience
- Structured activities total 384 hours, which includes 95 hours of simulated assessment [some units do not have hours attached to assessment]. There are an additional 26 hours private study (unstructured) = 410 hours. Note that this is designed to align with the nominal hours.
- The time allocation for assessment tasks (to be simulated in class) did not provide for sufficient time nor meet the conditions of assessment for a simulated work environment.

ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] TAS indicates:

- *The cohort is 'usually above the age of 18 years. They may be referred by Job Active Agencies including Disability Services. Student cohort in this program may be of a diverse range of nationalities and age groups and may be job seekers looking to enter the industry, may have been without work for some time, have become disengaged from a mainstream educational setting or have a disability and require additional support or time with education and learning or may just be looking for a new pathway in the Animal Care Industry. Most students looking to enrol in this course may have little to no experience in the Animal Care Industry within a vocational context.'*
- Structured activities total 297 hours, which includes 70 hours of simulated assessment [some units do not have hours attached to assessment]. There are an additional 113 hours private study (unstructured) = 410 hours. Note that volume of learning is designed to align with the nominal hours.

- The time allocation for assessment tasks (to be simulated in class) did not provide for sufficient time nor meet the conditions of assessment for a simulated work environment.

Interview with CEO and Compliance Officer

Compliance Officer indicated that the reason some units do not have simulated hours attached to the unit, is because these assessments would be written assessments which, therefore, are presumably calculated in the classroom hours if conducted there. In addition, the Compliance Officer indicated that the private study hours are calculated so that the total hours add up to Nominal Hours.

GF 4.1.1	Finding	Required Rectification(s)
	<p>CHC22015 Certificate II in Community Services ACM20117 Certificate II in Animal Studies</p> <p>The training and assessment strategies designed through the TAS, session plans and assessment tools did not enable each student to meet the requirements of the Training Package and specifically each unit of competency in which the student is enrolled.</p>	<p>The RTO is to review and redesign its training and assessment strategies to ensure each student will be able to meet the requirements of the Training Package, specifically for each unit of competency in which the student is enrolled.</p>

<p>GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:</p> <ul style="list-style-type: none"> a) the existing skills, knowledge and the experience of the student; b) the mode of delivery; and c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification. 	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>Training and assessment strategies:</p> <ul style="list-style-type: none"> • CHC22015 Certificate II in Community Services [VETDSS – Part-time] • ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] • ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] <p>CHC22015 Certificate II in Community Services [VETDSS – Part-time] TAS indicates:</p> <ul style="list-style-type: none"> • <i>‘FLC VETDSS Department cohort is made up of a range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with the [sic] requirements of “Specialist School” therefore enabling the need to maintain some face-to-face training for those students deemed ‘vulnerable’.</i> • Target group is those in years 10, 11 or 12 VCE or VCAL program • That there are no entry requirements • Classes are to run for 5.5 hours one day a week for 34 weeks (= 187) • Notes the amount of training as: 30 hours simulated workplace assessments, 151 hours facilitated activities, 5 hours workplace learning and assessment monitored by assessor = 186 hours. Volume of learning has in addition unstructured hours including 79 hours private study and 20 hours work placement = 99. The total number of hours of structured and unstructured learning is 285 hours. Note that this includes 20 hours of placement plus 5 hours of assessor at the placement which is inflating the figure. Note that with the volunteering unit removed from the TAS this information is now not accurate. Volume of learning is designed to align with the nominal hours. 	

ACM20117 Certificate II in Animal Studies [VETDSS – Part-time] TAS indicates:

- 'FLC VETDSS Department cohort is made up of a diverse range of young people, who are enrolled in VCAL either at FLC or a local secondary school. FLC falls within the align with [sic] the requirements of "Specialist School" therefore enabling the need to maintain some face-to-face training for those students deemed 'vulnerable'.'
- Target group is those in years 10, 11 or 12 VCE or VCAL program
- There are no entry requirements
- Delivery is to be conducted 1 day per week for 5.5 hours, over 2 calendar years. 68 weeks @1 x day face-to-face x 5.5 hours (374 hours). Independent study may be required on individual students needs and industry experience
- Structured activities total 384 hours, which includes 95 hours of simulated assessment (some units do not have hours attached to assessment). There are an additional 26 hours private study (unstructured) = 410 hours. Note that this is designed to align with the nominal hours.

ACM20117 Certificate II in Animal Studies [Adult class – Part-time delivery] TAS indicates:

- The cohort is '*usually above the age of 18 years. They may be referred by Job Active Agencies including Disability Services. Student cohort in this program may be of a diverse range of nationalities and age groups and may be job seekers looking to enter the industry, may have been without work for some time, have become disengaged from a mainstream educational setting or have a disability and require additional support or time with education and learning or may just be looking for a new pathway in the Animal Care Industry. Most students looking to enrol in this course may have little to no experience in the Animal Care Industry within a vocational context.*'
- Structured activities total 297 hours, which includes 70 hours of simulated assessment (some units do not have hours attached to assessment). There are an additional 113 hours private study (unstructured) = 410 hours. Note that volume of learning is designed to align with the nominal hours.

Interview with CEO and Compliance Officer

Compliance Officer indicated that the reason some units do not have simulated hours attached to the unit, is because these assessments would be written assessments which, therefore, are presumably calculated in the classroom hours if conducted there. In addition, the Compliance Officer indicated that the private study hours are calculated so that the total hours add up to Nominal Hours.

GF 4.2.1	Finding	Required Rectification(s)
	<p>CHC22015 Certificate II in Community Services [VETDSS – Part-time]</p> <p>The TAS:</p> <ul style="list-style-type: none"> • Calculates the amount of training to include assessment, which should be excluded • Does not enable sufficient time for simulated assessments to occur • Private study and workplace hours are included as unstructured hours, with private study not calculated on directed activities outside the class, but on the gap between amount of training and the nominal hours. <p>The RTO has not taken into account the individual needs of learners, the mode of delivery and the requirements for assessment when determining the amount of training.</p>	<p>The RTO is to review and revise the amount of training it provides to each student to ensure it takes into account:</p> <ul style="list-style-type: none"> • The existing skills, knowledge and the experience of the student; • The mode of delivery.
	<p>GF 4.2.2</p> <p>Finding</p>	<p>Required Rectification(s)</p>
	<p>ACM20117 Certificate II in Animal Studies</p> <p>The two TASs for this Qualification:</p> <ul style="list-style-type: none"> • Calculate the amount of training to include assessment, which should be excluded • Does not enable sufficient time for simulated assessments to occur • Private study and workplace hours are included as unstructured hours, with private study not calculated on directed activities outside the class, but on the gap between amount of training and the nominal hours – which is the same for each different cohort. <p>The RTO has not taken into account the individual needs of learners, the mode of delivery and the requirements for assessment when determining the amount of training.</p>	<p>The RTO is to review and revise the amount of training it provides to each student to ensure it takes into account:</p> <ul style="list-style-type: none"> • the existing skills, knowledge and the experience of the student; • the mode of delivery.

<p>GUIDELINE 4.3 - From 1 January 2016, to deliver any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor), an RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in Schedule 2 (and the definitions of independent validation and validation) of these Guidelines.</p>	<p>Not audited</p>
<p>GUIDELINE 4.4 - From 1 January 2016, to deliver any AQF qualification or skill set from the Training and Education Training Package (or its successor), an RTO ensures that all trainers and assessors delivering the training and assessment hold the training and assessment qualification at least to the level being delivered, or have demonstrated equivalence of competencies.</p>	<p>Not audited</p>
<p>GUIDELINE 4.5 - From 1 January 2017, to deliver the training and assessment qualification specified in Item 1 of Schedule 1 of these Guidelines, or any assessor skill set from the Training and Education Training Package (or its successor), an RTO ensures all trainers and assessors delivering the training and assessment:</p> <ul style="list-style-type: none"> v) hold the qualification specified in Item 5 of Schedule 1 of these Guidelines; or w) work under the supervision of a trainer that holds the qualification specified in Item 5 of Schedule 1 of these Guidelines. 	<p>Not audited</p>
<p>GUIDELINE 4.6 - An RTO ensures that any individual working under supervision holds the qualification specified in Item 1 of Schedule 1 of these Guidelines and does not determine assessment outcomes.</p>	<p>Not audited</p>
<p>GUIDELINE 4.7 - An application to add any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor) to an RTO's scope of registration has only be granted if an RTO has:</p> <ul style="list-style-type: none"> x) held registration for at least two years continuously at the time of adding the qualification and/or skill set to scope; and y) from 1 January 2016, undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with Guideline 4.3. 	<p>Not audited</p>

GUIDELINE 5.1 - An RTO registered with the VRQA has provided an annual declaration of compliance with the AQTF Essential Conditions and Standards for Continuing Registration (the AQTF Standards) and these Guidelines, and in particular whether it:

- z) currently meets the requirements of the AQTF Standards and these Guidelines across all of its existing scope of registration; and
- aa) has met the requirements of the AQTF Standards for all AQF certification documentation which it has issued in the previous 12 months; and
- bb) has training and assessment strategies and practices in place that ensure that all current and prospective students are or will be trained and assessed in accordance with the requirements of the AQTF Standards and these Guidelines.

Not audited