



REPORT

Audit report: Training Management Pty Ltd

RTO number:	32254
CRICOS number:	N/A
Date/s of audit:	30 Jul 2019
Date report created:	22 August 2019
Date report updated:	30/09/2019

Organisation details

Organisation's legal name:	Training Management Pty Ltd
Trading name/s:	Anywhere Anytime Training RPL Certification Traxion Training
RTO number:	32254
CRICOS number:	N/A

Audit team

Lead auditor:	Denise Middleton
Assistant/s:	Judith Keller

Audit details

Application number/s:	N/A
Audit number:	AUDREC0009310
Audit reason:	Compliance Monitoring
Address of site/s visited:	Unit 1 Level 2 17-19 Mt Gravatt-Capalaba Rd UPPER MOUNT GRAVATT QLD 4122 Australia
Date of audit:	30 Jul 2019
Organisation's contact for audit:	Robert Simpson Chief Executive Officer service@traxiontraining.com.au 07 3038 3184

Original finding at time of audit

Audit finding: Serious non-compliance

Report completed by: Denise Middleton & Judith Keller

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1*	Not compliant
Enrolment	5.1, 5.2, 5.3, 7.3	Compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.1*, 1.2, 1.3*, 1.8*, 1.13*, 1.14, 1.16	Not compliant
Completion	3.1	Compliant

*Indicates a non-compliant clause

Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 20/09/2019: Compliant

Report completed by: Judith Keller

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1	Compliant
Training and Assessment	1.1, 1.3, 1.8, 1.13	Compliant

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

- There have been significant changes to the management of this organisation in recent times. Currently, the structure of the organisation consists of Chief Executive Officer, General Manager, Quality Manager, Administration Systems Manager, twelve administration staff and eighteen casual trainers/assessors. The structure will change as the organisation changes its focus and reduces the number of qualifications on its scope of registration. Reduction of scope of registration will take place as the organisation completes training for students currently enrolled in certain qualifications. The trainer/assessor for pool and spa qualifications is a contractor who is currently employed in industry.

Scope of organisation's registration:

Qualifications:

- AHC10116 Certificate I in Conservation and Land Management
- BSB10115 Certificate I in Business
- BSB30115 Certificate III in Business
- BSB30415 Certificate III in Business Administration
- BSB31015 Certificate III in Business Administration (Legal)
- BSB40215 Certificate IV in Business
- BSB40515 Certificate IV in Business Administration
- BSB40615 Certificate IV in Business Sales
- BSB42015 Certificate IV in Leadership and Management
- BSB42515 Certificate IV in Small Business Management
- BSB42518 Certificate IV in Small Business Management
- BSB42615 Certificate IV in New Small Business
- BSB42618 Certificate IV in New Small Business
- BSB50215 Diploma of Business
- BSB50515 Diploma of Franchising
- BSB50615 Diploma of Human Resources Management
- BSB50618 Diploma of Human Resources Management
- BSB51915 Diploma of Leadership and Management
- BSB51918 Diploma of Leadership and Management
- CHC30113 Certificate III in Early Childhood Education and Care
- CHC30213 Certificate III in Education Support
- CHC32015 Certificate III in Community Services
- CHC33015 Certificate III in Individual Support
- CHC40213 Certificate IV in Education Support
- CHC40413 Certificate IV in Youth Work
- CHC42015 Certificate IV in Community Services
- CHC43015 Certificate IV in Ageing Support
- CHC43115 Certificate IV in Disability
- CHC43315 Certificate IV in Mental Health

- CHC43415 Certificate IV in Leisure and Health
- CHC50113 Diploma of Early Childhood Education and Care
- CHC50213 Diploma of School Age Education and Care
- CHC52015 Diploma of Community Services
- CPP31212 Certificate III in Swimming Pool and Spa Service
- CPP31218 Certificate III in Swimming Pool and Spa Service
- CPP41312 Certificate IV in Swimming Pool and Spa Service
- FNS30115 Certificate III in Financial Services
- FNS30515 Certificate III in General Insurance
- FNS40217 Certificate IV in Accounting and Bookkeeping
- FNS50215 Diploma of Accounting
- FNS60215 Advanced Diploma of Accounting
- FSK20113 Certificate II in Skills for Work and Vocational Pathways
- HLT23215 Certificate II in Health Support Services
- HLT33115 Certificate III in Allied Health Assistance
- HLT37315 Certificate III in Health Administration

Explicit scope unit of competency:

- CHCECE028 Collaborate with families to plan service and supports

Accredited course

- 10660NAT Course in Swimming Pool Safety Inspections

Suburb and state of all delivery sites:

- The organisation delivers in various locations across Queensland; however, it has approval to deliver in every State and Territory. The sites used for training and assessment are not all permanent delivery sites as the organisation hires some premises on an as-needed basis.

Third party usage:

- The organisation does not have any active third arrangements in place at present.

Core clients/target groups:

- Skilled workers
- Unskilled job seekers
- Apprentices/trainees.

Training Revenue (Funded or fee for service):

- The organisation delivers funded training through User Choice, Certificate 3 Guarantee, and Higher Level Skills contracts with the Queensland Government and fee for service training. The organisation is funded by the Queensland Government to deliver skill sets.

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

- 1584 (approximately 1200 of these enrolments are in explicit scope unit of competency CHCECE028)

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

- Information provided by students as part of a student survey or interview.
- Information provided directly by Training Management Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Training Management Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Training Management Pty Ltd conducted on 30 Jul 2019.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>BSB30415 Certificate III in Business Administration</i>	Distance, Mixed	4
<i>CHC33015 Certificate III in Individual Support</i>	Distance, RPL	11
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Distance, Mixed	19
<i>CHC52015 Diploma of Community Services</i>	Distance, Mixed	2
<i>CPP31212 Certificate III in Swimming Pool and Spa Service</i>	Distance, Mixed	0
<i>FNS30115 Certificate III in Financial Services</i>	Online, Mixed	0
<i>FNS60215 Advanced Diploma of Accounting</i>	Online, Mixed	0
<i>HLT37315 Certificate III in Health Administration</i>	Distance, Mixed	3
<i>AHC10116 Certificate I in Conservation and Land Management</i>	Face to face (workplace), Mixed	0
<i>CPP31218 Certificate III in Swimming Pool and Spa Service</i>	Distance	0
<i>CHC40413 Certificate IV in Youth Work</i>	Distance, Mixed	4

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

Interviewees

Name	Position	Training products
Tara Kent	Training Quality Manager	BSB30415, CHC50113, CHC30115, FNS60215, AHC10116
Summer Bolt	Administration	N/A
Chris Jones	General Manager	N/A

About this Report

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

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

Correcting a non-compliance may require:

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

Original action required by Organisation

Training Management Pty Ltd did not meet all requirements for clauses Standards for RTOs: 1.1, 1.13, 1.3, 1.8, 4.1

Remedial action is required for the following training products:

- AHC10116 Certificate I in Conservation and Land Management
 - HLTAID003 Provide first aid
- CHC33015 Certificate III in Individual Support
 - CHCAGE001 Facilitate the empowerment of older people
- FNS60215 Advanced Diploma of Accounting
 - FNSACC601 Prepare and administer tax documentation for legal entities

The organisation is required to provide evidence that demonstrates:

Marketing/Recruitment

Standards for RTOs Clause 4.1

- All information, whether disseminated directly by the organisation or on its behalf by third parties, contains correct details about the training products offered by the organisation, consistent with its scope of registration.

Training and Assessment

Standards for RTOs Clause 1.1

- The organisation has corrected its documented training strategies to align with the provider's actual practice in relation to the delivery of the each training product
- The organisation has corrected its training and assessment strategies and practice to enable learners to meet all of the requirements of the relevant training package.

Standards for RTOs Clause 1.3

- The organisation now has sufficient trainers/assessors who meet the requirements of the Standards to deliver *FNS60215 Advanced Diploma of Accounting*.

Standards for RTOs Clause 1.8

- The organisation has corrected its assessment system to comply with Clause 1.8 for future students and has systems in place to ensure it is this system that is applied. The evidence must:

- include the full suite of assessment tools for each unit of competency identified as non-compliant
- demonstrate the organisation will implement an assessment system that ensures assessment:
 - complies with the assessment requirements of the relevant training products
 - will be conducted in accordance with the principles of assessment and rules of evidence.
- The organisation has carried out remedial action to identify and address the impact the non-compliance may have caused students in the sampled training products that have been assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action needs to cover current students and students who have been assessed by the organisation in the past three months.

Standards for RTOs Clause 1.13

- The trainers/assessors currently used by the organisation to deliver *FNS60215 Advanced Diploma of Accounting* meets all of the requirements specified in Clause 1.13 of the Standards.

Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by Training Management Pty Ltd on 20/09/2019, the organisation:

- provided sufficient evidence to demonstrate compliance with:
Standards for RTOs:
 - 1.1
 - 1.13
 - 1.3
 - 1.8
 - 4.1

Areas of non-compliance

Marketing/Recruitment Practices

Standards for RTOs Clause 4.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **Compliant***

Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes 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;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
 - i) a learner will successfully complete a training product on its scope of registration; or
 - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
 - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

- The following evidence was reviewed:
 - 05_01_Certificate I in Conservation & Land Management.pdf
 - 05_08_Certificate III in Financial Services
 - 05_09_Advanced Diploma of Accounting.pdf
 - Website <http://www.traxiontraining.com.au/courses/> - reviewed during site audit 30 July 2019
- The organisation's marketing material (PDF documents) provided by the RTO prior to the site audit did not contain accurate information regarding the RTO's unit offerings for the following training products. Specifically:
 - The document pertaining to AHC10116 Certificate I in Conservation and Land Management contained an incomplete unit code for core unit *AHCWHS101 Work safely*.
 - The document pertaining to FNS30115 Certificate III in Financial Services contained an incomplete unit title for core unit *BSBWHS201 Contribute to health and safety of self and others*.

- The document pertaining to FNS60215 Advanced Diploma of Accounting contained incorrect unit titles for elective units *FNSACC504 Prepare financial reports for corporate entities* and *FNSACC506 Implement and maintain internal control procedures*.

The provider's representative at the site audit advised that the .pdf documents were electronic versions of course information that had previously been published on the RTO's website, and that the course information has been removed from the website since the PDF documents were submitted to ASQA as the RTO will no longer be offering the above training products.

- Review of the course information pages on the provider's website as at 30 July 2019 confirmed that the website no longer contains information regarding the training products AHC10116 Certificate I in Conservation and Land Management, FNS30115 Certificate III in Financial Services and FNS60215 Advanced Diploma of Accounting.
- The provider was unable to evidence at audit the process that is and has been used to ensure that all marketing material/collateral published and disseminated contains accurate and correct information regarding the RTO's course offerings.

Analysis of additional evidence

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf - pages 3-4
 - 20190805 Meeting minutes.docx
 - AHC10116 Marketing Material Error.eml
 - FNS30115 Marketing Material Error.eml
 - FNS60215 Marketing Material Error.eml
 - FNS60215 Marketing Material Error – Email Response.pdf
 - AHC10116 Certificate I in Conservation & Land Management.pdf
 - FNS30115 Certificate III in Financial Services.pdf
 - FNS60215 Advanced Diploma of Accounting.pdf
 - AHC10116 Marketing Checklist.docx
 - FNS30115 Marketing Checklist.docx
 - FNS60215 Marketing Checklist.docx
 - Marketing Policy
 - Continuous Improvement Register.xlsx
 - Re-Validation Plan.docx
- The organisation has taken action to address the non-compliance, by amending its processes for the creation and publication of marketing collateral to ensure that information contains correct details about the training products offered, consistent with its scope of registration.
- The organisation has carried out sufficient remedial action to identify and address the impact the previous non-compliance may have caused students.

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **Compliant***

The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses

and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

AHC10116 Certificate I in Conservation and Land Management

FNS30115 Certificate III in Financial Services

FNS60215 Advanced Diploma of Accounting

- The following evidence was reviewed:
 - TAS_AHC10116_2019_V2 CI in Conservation and Land_MIXED MODE.docx
 - TAS_FNS30115_2019_CIII in Financial Services_MIXED MODE.docx
 - TAS_FNS60215_2019 Adv Diploma of Accounting_MIXED MODE.docx

- The organisation's documented training and assessment strategies for the above training products are inconsistent with information published on the National Register. For example:
 - The training and assessment strategy document provided for AHC10116 Certificate I in Conservation and Land Management contained an incomplete unit code for core unit *AHCWHS101 Work safely*.
 - The training and assessment strategy document provided for FNS30115 Certificate III in Financial Services contained an incomplete unit title for core unit *BSBWHS201 Contribute to health and safety of self and others*.
 - The training and assessment strategy document provided for FNS60215 Advanced Diploma of Accounting contained incorrect unit titles for elective units *FNSACC504 Prepare financial reports for corporate entities* and *FNSACC506 Implement and maintain internal control procedures*.

- The 'course structure and delivery plan' included in the organisation's documented training and assessment strategy for AHC10116 Certificate I in Conservation and Land Management does not align with the packaging rules for the training product. Specifically, the 'course structure and delivery plan' contains 7 units of competency, whereas the packing rules in the AHC Training Package only require a total of 6 units for completion of the qualification. Furthermore, the 'course structure and delivery plan' includes a unit that is not listed in 'units of competency' table on page 2 in the RTO's training and assessment strategy document for AHC10116.

- The training and assessment strategy document provided for AHC10116 Certificate I in Conservation and Land Management identifies the human resources (nominated trainer/assessor) used by the organisation for delivery of the above training product. However, this information does not align with the organisation's practice. Specifically, in the training and assessment strategy document a single trainer/assessor was identified for all units of competency. However the RTO's representative confirmed that nominated trainer/assessor does not deliver elective unit *HLTAID003 Provide first aid*, therefore the information provided in the strategy document does not accurately reflect the organisation's practice and resources used in delivering the training product.

Analysis of additional evidence

AHC10116 Certificate I in Conservation and Land Management

FNS30115 Certificate III in Financial Services

FNS60215 Advanced Diploma of Accounting

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf - pages 5-8
 - 20190805 Meeting Minutes.docx
 - AHC10116 TAS Checklist.docx
 - FNS30115 TAS Checklist.docx
 - FNS60215 TAS Checklist.docx

- AHC10116 Training & Assessment Strategy.docx
 - FNS30115 Training & Assessment Strategy.docx
 - FNS60215 Training & Assessment Strategy.docx
 - TAS Review process.docx
 - Continuous Improvement Register.xlsx
 - Re-Validation Plan.docx.
- The organisation has addressed the non-compliance.

Standards for RTOs Clause 1.3

Original Finding: Not compliant

Finding following additional evidence: Compliant

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

- a) trainers and assessors to deliver the training and assessment;
 - b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;
 - c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and
 - d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.
- The organisation has not demonstrated that it has access to a sufficient number of trainers/assessors who meet the requirements of the Standards to deliver all of the units of competency specified in its documented training and assessment strategy for the training product *FNS60215 Advanced Diploma of Accounting*. Refer to Clause 1.13 for further details.

Analysis of additional evidence

- The following additional evidence was reviewed:
 - As for Clause 1.13.
- The additional evidence provided by the organisation has addressed the non-compliance.

Standards for RTOs Clause 1.8

Original Finding: Not compliant

Finding following additional evidence: Compliant

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

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

Table 1.8.1 Principles of Assessment

Fairness	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.</p>
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Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none"> • reflecting the learner's needs; • assessing competencies held by the learner no matter how or where they have been acquired; and • drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none"> • assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance; • assessment of knowledge and skills is integrated with their practical application; • assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and • judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>
<p>Table 1.8.2 Rules of Evidence</p>	
Validity	<p>The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.</p>
Sufficiency	<p>The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.</p>
Authenticity	<p>The assessor is assured that the evidence presented for assessment is the learner's own work.</p>
Currency	<p>The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.</p>

AHC10116 Certificate I in Conservation and Land Management

- The following evidence was reviewed:
 - Assessment tools for:
 - HLTAID003 Provide first aid* (clustered with unit *HLTAID001*)
 - HLTAID003 Assessor Guide - including:
 - student instructions
 - answers to Assessment One (1) comprising 13 multiple choice questions and 7 true/false statements (for unit *HLTAID001*)
 - answers to Assessment Two (2) comprising 15 multiple choice questions, 4 true/false statements, a cloze activity, matching activity – 7 terms and meaning.
 - Completed student assessment items (and the assessment tools used):
 - HLTAID003 Provide first aid* (clustered with unit *HLTAID001*)
 - Former student 'M'
 - CPR and First Aid Student Checklist (completed)
 - Cardiopulmonary Resuscitation CPR – Adult
 - Cardiopulmonary Resuscitation CPR – Infant
 - Cardiopulmonary Resuscitation CPR – Child
 - First Aid HLTAID003 - Task 1 Allergic reaction anaphylaxis; Task 2 Asthma (respiratory distress); Task 3 Bleeding control – apply basic wound care and bandaging for a laceration, severe bleeding; Task 4 First

aid procedures for choking and airway obstruction; Task 5 Envenomation, using pressure immobilisation; Task 6 Fractures, sprains and strains; Task 7 Head injuries; Task 8 Poisoning; Task 9 Seizures and convulsions including febrile convulsions and epilepsy; Task 10 Shock; Task 11 Burns; Task 12 Demonstrate safe manual handling techniques.

- Assessment One (1) and Assessment Two (2) completed and marked.

The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for the above unit of competency for all non-compliances identified below and provide evidence:

- *of a revised assessment system for the unit of competency listed above that addresses all requirements of Clause 1.8*
 - *that confirms students were assessed as meeting all the requirements of the training product.*
- Validity and Sufficiency - the assessment tools do not address and collect evidence of candidate performance with respect to all unit of competency requirements. For example, but not limited to:
- Performance Evidence:
 - *There must be evidence that the candidate has completed the following tasks in line with state/territory regulations, first aid codes of practice, Australian Resuscitation Council (ARC) guidelines and workplace procedures:*
 - *Followed DRSABCD in line with ARC Guidelines, including: ...*
 - *responded appropriately in the event of regurgitation or vomiting*
 - *followed single rescue procedure, including the demonstration of a rotation of operators with minimal interruptions to compressions*
 -
 - Assessment conditions:
 - The assessment conditions specified in HLT training package for unit HLTAID003 state:

Skills must be demonstrated working individually in an environment that provides realistic in-depth industry validated scenarios and simulations to assess candidates' skill and knowledge.

Due to the lack of information provided/recorded in the RTO's assessment tools in relation to the conduct of the first aid assessment tasks, it could not be confirmed how/that the HLT training package assessment conditions are/have been satisfied with respect to the assessment of individual candidates.
- Reliability - the assessment tools do not contain sufficient instructions performance benchmarks for each practical skill to be demonstrated; therefore, it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors. For example:
- The RTO was unable to evidence at audit the benchmarks that are used to determine whether or not candidates have performed the first aid assessment tasks 'in a satisfactory manner'. It was noted that the assessor was required to sign a statement that *'By signing I agree that the candidate has completed the above tasks in line with state/territory regulations, first aid codes of practice, Australian Resuscitation Council (ARC) guidelines and workplace procedures'*, however the performance benchmarks relevant to each task as specified in the regulations, codes of practice, ARC guidelines and workplace procedures as at the time of assessment were not referenced.
 - Furthermore, the first aid tasks assessment tool does not gather evidence of the candidate's actual performance in applying first aid, with the only record being that of the assessor's determination (a tick 'Yes' or 'No' against each specified 'task') to indicate whether the candidate performed the 'task' in a satisfactory manner. In addition, for several 'tasks' it is unclear what candidates are required to actually demonstrate and the associated context - for example, Task 7 simply states 'Head injuries'.

FNS60215 Advanced Diploma of Accounting

- The following evidence was reviewed:
 - Assessment tools for:
FNSACCC601 Prepare and administer tax documentation for legal entities
 - Assessor Guide – including:
 - Assessor instructions
 - Assessment cover sheet
 - Unit information
 - Assessment Task 1 - Written questions x 21
 - Assessment Task 2 - Project 1
 - Assessment Task 3 - Project 2
 - Assessment Task 4 - Verbal questions
 - Completed student assessment items (and the assessment tools used):
 - None (the RTO's representative advised at audit that the most recent student completed 17 December 2018)

The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system for the above unit of competency for all non-compliances identified below and provide evidence:

- *of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.*
- Reliability - the assessment tools do not contain current and accurate benchmarks for all written assessment tasks; therefore, it cannot be confirmed that consistent judgements will be made across a range of students and assessors. For example, but not limited to:
 - The answer provided to Question 16 of Assessment Task 1 in the Assessor Guide does not identify correct and current requirements of employers under the Superannuation Guarantee (Administration) Act 1992, with regard to the superannuation guarantee percentage.

CHC33015 Certificate III in Individual Support

- The following evidence was reviewed:
 - Assessment tools for:
CHCAGE001 Facilitate the empowerment of older people
 - Assessor guide
 - AT1 - Knowledge questions
 - AT2 – Practical assessment
 - AT3 – Observation.

The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system for the above unit of competency for all non-compliances identified below and provide evidence:

- *of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.*
- Validity and Sufficiency - the assessment tools do not address and collect evidence of candidate performance with respect to all unit of competency requirements. For example, but not limited to:
 - Performance Evidence:
The practical assessment is a direct copy of the performance criteria instead of observable tasks; consequently the assessment does not fully address all of the unit performance evidence requirements which state:

The candidate must show evidence of the ability to complete task outlined in the elements and performance criteria of this unit, manage tasks and manage contingencies in the context of the job role ...

Analysis of additional evidence

AHC10116 Certificate I in Conservation and Land Management

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf – pages 11-13
 - 20190805 Meeting Minutes.docx
 - Continuous Improvement Register.xlsx
 - Assessment tools for:
 - HLTAID003 Provide first aid*
 - Updated assessment benchmarking tool:
 - i. HLTAID003 AT1.docx
 - ii. HLTAID003 AT2.docx
 - iii. HLTAID003 Question and answer sheet AT1.docx
 - iv. HLTAID003 Marking sheet AT1.docx
 - v. HLTAID003 Marking sheet AT2.docx
 - vi. HLTAID003 Benchmark AT1.docx
 - vii. HLTAID003 Benchmark AT2.docx
 - viii. HLTAID003 Benchmark Incident report form.docx
 - ix. HLTAID003 Assessment Record.docx
 - x. HLTAID003 Incident report form.docx
 - xi. HLTAID003 Simulation skills station scripts AT2.docx
 - xii. HLTAID003 Validation Map.xlsx
 - Scenario Guide (old assessment tool):
 - i. HLTAID003 Scenario Guide (outdated).docx
 - Email to students:
 - i. HLTAID003 Update to Assessment.eml
 - Email to trainers regarding training:
 - i. Trainer Training Meeting.pdf
 - Re-validation plan:
 - i. Re-Validation Plan.docx.
 - Completed student assessment items / Remedial action evidence:
 - HLTAID003 Provide first aid*
 - No student assessment items were provided. The RTO advised on page 12 in the document '20190920 Response to ASQA re audit findings.pdf', that:
 - 'There have been no students who have been assessed in this unit in the previous three months. There are, however, 4 students currently studying this unit. The relevant trainer has been informed that the newly validated assessment tools are to be used when completing the assessment for these students. The (sic) previous version of the assessment has been removed from the resource portal and each of the students have been informed of this change to ensure that they are not referencing outdated materials.'*
 - The organisation has addressed the non-compliance for future students.
 - The organisation has carried out sufficient remedial action to address the impact the previous non-compliance may have potentially caused currently enrolled students.

FNS60215 Advanced Diploma of Accounting

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf – pages 11 and 14
 - 20190805 Meeting Minutes.docx
 - Continuous Improvement Register.xlsx
 - Assessment tools for:
 - FNSACC601 Prepare and administer tax documentation for legal entities*
 - Updated assessment benchmarking tool:
 - i. FNSACC601 Assessor Guide.docx
 - ii. FNSACC601 Validation Map.xlsx
 - iii. FNSACC601 Raw Data CMH Solutions Pty Ltd.xlsx
 - Re-validation plan:
 - i. Re-Validation Plan.docx.
 - Completed student assessment items (and the assessment tools used):
 - FNSACC601 Prepare and administer tax documentation for legal entities*
 - Previously submitted assessment from student (correctly marked)
 - FNSACC601 D-M, K AT1.pdf
 - Remedial action evidence:
 - FNSACC601 Prepare and administer tax documentation for legal entities*
 - No remedial action evidence was provided, as the RTO advised on page 12 in the document '20190920 Response to ASQA re audit findings.pdf', that:
'As the assessments provided by learners previously had all been marked correctly it is safe to say that there has been no impact on learners as a result of this. There are no students currently enrolled in this unit, nor have any students been assessed in the past 3 months.'
-
- The organisation has addressed the non-compliance for future students; however it is also noted in the RTO's written response that, *'Training Management Pty Ltd has no current enrolments in FNS60215 Advanced Diploma of Accounting and intends to remove this from scope upon completion of this audit.'*

CHC33015 Certificate III in Individual Support

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf – pages 11, 15 and 16
 - 20190805 Meeting Minutes.docx
 - Continuous Improvement Register.xlsx
 - Assessment tools for:
 - CHCAGE001 Facilitate the empowerment of older people*
 - Updated assessment benchmarking tool:
 - i. CHCAGE001 Assessor guide.doc
 - ii. CHCAGE001 Validation Map.xlsx
 - Email to students:
 - i. CHCAGE001 Update to Assessment.eml
 - Email to trainers regarding training:
 - i. Trainer Training Meeting.pdf
 - Re-validation plan:
 - i. Re-Validation Plan.docx.
 - Completed student assessment items (and the assessment tools used):
 - CHCAGE001 Facilitate the empowerment of older people*
 - Previously submitted assessment from student
 - i. CHCAGE001 M,F AT1.pdf
 - Remedial action evidence:
 - CHCAGE001 Facilitate the empowerment of older people*
 - No remedial action evidence was provided, as the RTO advised on page 15 in the document '20190920 Response to ASQA re audit findings.pdf', that:

'There have been no students assessed in this unit in the past 3 months. There are, however, a number of students currently enrolled in this unit. They will have their assessment kits replaced with the updated version. Trainers and students have been contacted to advise accordingly.'

- The additional evidence provided confirms that the organisation has addressed the previously identified non-compliance for future students.
- The organisation has carried out sufficient remedial action address the impact the previous non-compliance may have potentially caused currently enrolled students.

Trainer and assessor competency

Standards for RTOs Clause 1.13

Original Finding: Not compliant

Finding following additional evidence: Compliant

In addition to the requirements specified in Clause 1.14 and Clause 1.15, the RTO's training and assessment is delivered only by persons who have:

- 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.**

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

FNS60215 Advanced Diploma of Accounting

The following evidence was reviewed:

- TAS_FNS60215_2019 Adv Diploma of Accounting_MIXED MODE.docx
 - KENT, Tara PD Mapping.docx
- The RTO's representative at audit confirmed that Ms Tara Kent is currently the sole trainer/assessor for the above training product. However, the provider's documented training and assessment strategy does not identify Ms Kent (or any other person) as the nominated trainer/assessor for unit *FNSACC601 Prepare and administer tax documentation for legal entities*, listed in the provider's 'course structure and delivery plan' for the qualification. Furthermore, documentation provided in respect of Ms Kent did not include sufficient evidence to demonstrate that she possesses vocational competencies to the level required to deliver unit *FNSACC601*. Accordingly, it could not be confirmed that the RTO's training and assessment for unit *FNSACC601 Prepare and administer tax documentation for legal entities* (included in the above qualification) will only be delivered by a person/s who have the required vocational competencies, current industry skills and current knowledge and skills in vocational training and learning, as specified in Clause 1.13.

Analysis of additional evidence

FNS60215 Advanced Diploma of Accounting

- The following additional evidence was reviewed:
 - 20190920 Response to ASQA re audit findings.pdf - page 17
 - 20190805 Meeting Minutes.docx
 - FNS60215 KENT, Tara Trainer Mapping.docx
 - KENT, Tara Qualifications.pdf
 - Continuous Improvement Register.xlsx

- Re-Validation Plan.docx
- The additional evidence provided by the organisation has addressed the non-compliance