



# REPORT

## Audit report: Benleader Pty Ltd

RTO number:	22511
CRICOS number:	03394G
Date/s of site visit:	N/A
Date report created:	23/09/2020
Date report updated:	9/11/2020

## Provider details

Provider's legal name:	Benleader Pty Ltd
Trading name/s:	Victorian International Academy
RTO number:	22511
CRICOS number:	03394G

## Audit team

Lead auditor:	Eliza Chiam
Auditor/s:	Emma Stokes

## Audit details

Application number/s:	ADDVET0033848
Audit number/s:	AUDREC0010903
Audit reason/s:	Application – Change (VET)
Date of opening meeting/discussion:	21/09/2020
Date of closing meeting/discussion:	22/09/2020
Provider's contact for audit:	Ms. Michelle Armstrong Compliance Manager <a href="mailto:rtomanager@victorianacademy.com.au">rtomanager@victorianacademy.com.au</a> 0437 014 772
Address/es of site/s visited (if applicable):	131 Johnston Street Fitzroy VIC 3065 Australia

## Summary of audit findings

**Audit finding: Serious non-compliance**

**Report completed by:** Eliza Chiam

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1*, 1.2*, 1.3, 1.8*, 1.9, 1.10, 1.11, 1.13*, 1.14*, 1.16*	11.1, 11.2*, 8.18, 8.19, 8.20	Not compliant
Marketing/Recruitment Practices	4.1	1.1, 1.2, 1.3, 1.4	Compliant
Enrolment	5.1, 5.2, 5.3	2.2, 2.1, 3.1, 3.3, 8.5, 3.4	Compliant
Support and Progression	1.7	6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.9, 8.1, 8.3, 8.4	Compliant
Completion	3.1		Compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	4.1, 4.2, 4.3	Compliant

\*Indicates a non-compliant clause

## Summary of audit findings following analysis of additional evidence

**Audit finding following analysis of additional evidence provided on 06/11/2020: Compliant**

**Report completed by:** Emma Stokes

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1, 1.2, 1.8, 1.13, 1.14, 1.16	11.2	Compliant

\*Indicates a non-compliant clause

## Background

Benleader Pty Ltd (the provider) was granted its RTO, and CRICOS registration in December 2010, and September 2014 respectively.

Summary of provider and management structure:

- Chief Executive Officer: Lakhmir Mahar
- Compliance Manager: Michelle Armstrong
- Operations Manager: Ateeb Malik
- Accounts Manager: Dilpreet Kaur.

Scope of provider's registration:

- VET scope of registration:
  - *CHC33015 Certificate III in Individual Support*
  - *SHB20216 Certificate II in Salon Assistant*
  - *SHB30416 Certificate III in Hairdressing*
  - *SHB30516 Certificate III in Barbering*
  - *SHB40216 Certificate IV in Hairdressing*
  - *SHB50216 Diploma of Salon Management*
  - *HLTINFCOV001 Comply with infection prevention and control policies and procedures.*

- CRICOS scope of registration:
  - *SHB20216 Certificate II in Salon Assistant*
  - *SHB30416 Certificate III in Hairdressing*
  - *SHB30516 Certificate III in Barbering*
  - *SHB40216 Certificate IV in Hairdressing*
  - *SHB50216 Diploma of Salon Management.*

On 29 July 2020, the provider submitted an application to add the following training products to its VET scope of registration:

- *CHC43015 Certificate IV in Ageing Support*
- *CHC43115 Certificate IV in Disability*
- *CHC52015 Diploma of Community Services*
- *HLTAID001 Provide cardiopulmonary resuscitation*
- *HLTAID003 Provide first aid.*

Suburb and state of all delivery sites:

- The provider only delivers training and assessment in Victoria.

Third party usage:

- The provider engages with a number of education agents for the recruitment of both its domestic, and overseas students.

Core clients/target groups:

- Mature aged students with English as a second language, generally underemployed or reskilling for employment
- Early school leavers
- Long term unemployed
- Employed in industry with little or no formal qualifications
- Overseas students.

Training Revenue:

- The provider's main source of revenue is from a Government funding contract (Skills First); however, it also accepts fee for service students.

Total number of current enrolments in the provider as at 21/09/2020: 481

- *CHC33015 Certificate III in Individual Support: 155*
- *SHB30416 Certificate III in Hairdressing: 314*
- *SHB30516 Certificate III in Barbering: 9*
- *SHB40216 Certificate IV in Hairdressing: 1*
- *SHB50216 Diploma of Salon Management: 2*

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 Benleader Pty Ltd to ASQA
- existing information and records held by ASQA concerning Benleader Pty Ltd
- information provided to ASQA's auditors and documentation reviewed during the desk audit of Benleader Pty Ltd conducted on 21 – 24 September 2020
- other publicly available information - including but not limited to, information published on the provider's and third-party websites.

## Training products sampled

Training Products	Mode/s of delivery/assessment*	Current enrolments
CHC33015 Certificate III in Individual Support	Face to face	155
CHC43015 Certificate IV in Ageing Support	Face to Face	0
CHC43115 Certificate IV in Disability	Face to Face	0
CHC52015 Diploma of Community Services	Face to Face	0
SHB30416 Certificate III in Hairdressing	Face to Face	314
SHB50216 Diploma of Salon Management	Face to Face	2
HLTAID003 Provide first aid	Face to Face	0
HLTINFCOV001 Comply with infection prevention and control policies and procedures	Face to Face	0

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

## Interviewees

Name	Position	Training products
Lakhmir Mahar	Chief Executive Officer	All
Michelle Armstrong	Compliance Manager	All

## About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting 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.

## Areas of non-compliance and action required

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs - Standard 1

The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.

##### Clause 1.1

**Audit 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.

##### Clause 1.2

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

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

- a) the existing skills, knowledge and the experience of the learner;
- 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.

##### Key sources of evidence relevant to finding

- *CHC33015 Certificate III in Individual Support*
  - *CHC33015 Certificate III in Individual Support* (classroom based) – TAS, version 2.0 August 20
- *CHC43015 Certificate IV in Ageing Support*
  - *CHC43015 Certificate IV in Ageing Support* (full-time classroom based) – TAS, version 1.0 July 2020
- *CHC43114 Certificate IV in Disability*
  - *CHC43115 Certificate IV in Disability* (full-time classroom based) – TAS, version 1.0 July 2020
- *CHC52015 Diploma of Community Services*
  - *CHC52015 Diploma of Community Services* (classroom based) – TAS, version 1.0 July 2020
- *SHB30416 Certificate III in Hairdressing*
  - *SHB30416 Certificate III in Hairdressing* (classroom based - part time students) – TAS, version 5.0 July 2019
  - *SHB30416 Certificate III in Hairdressing* (international students) – TAS, version 5.0 June 2019
- *SHB50216 Diploma of Salon Management*
  - *SHB50216 Diploma of Salon Management* (classroom based) Training and Assessment Strategy version 4.0 September 2019
  - *SHB50216 Diploma of Salon Management* (international students) – TAS, version 4.0 June 2019
- *HLTAID003 Provide first aid*
  - *HLTAID003 Provide first aid* – Training and Assessment Strategy version 1.0 July 2020
- *HLTAIDCOVID001 Comply with infection and control Policies and procedure*
  - *HLTINFCOV001 Comply with infection prevention and control policies and procedures* – Training and Assessment Strategy version 1.0 May 2020.
- Interview with Compliance Manager, Ms Michelle Armstrong.

## Evidence analysis

RTOs are responsible for developing, implementing, monitoring and evaluating quality training and assessment strategies and practices that meet training package and VET accredited course requirements.

### *CHC33015 Certificate III in Individual Support*

The provider demonstrated that it has a strategy for the training product reviewed; however, ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The Australian Qualifications Framework (AQF) volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes for each qualification type and describes how long a student who does not hold the competencies identified in the relevant units of competency would take to develop all of the required skills and knowledge. '*Volume of learning*' includes all teaching, learning and assessment activities that a typical student must undertake to achieve the learning outcomes. For example:
  - Certificate III: 1 – 2 year (1200 – 2400 hours).

The provider's current volume of learning (a total of 681 hours) includes the following:

- 463 hours of training, delivery, learning, assessment and work placement (120 hours)
- 10 hours of monitoring contact by the provider
- 208 hours of reading, research, case studies and project work.

The qualification is to be delivered over 52 weeks.

While the course duration meets the AQF recommendation, the 681 volume of learning hours fall significantly short of the recommended 1200 - 2400 hours. A shorter volume of learning hours may be appropriate; however, the provider has not provided a rationale for the above training product, which justifies why the volume of learning varies significantly from the description outlined in the AQF volume of learning, and is suitable for its target group(s).

- The provider's strategy did not ensure that the target group(s) and student characteristics are clearly identified as it identified multiple target groups, which ranged from unemployed through to those working in the industry. Each strategy needs to be tailored to meet the needs of each target group.

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.

### *CHC43015 Certificate IV in Ageing Support*

#### *CHC43114 Certificate IV in Disability*

#### *CHC52015 Diploma of Community Services*

The provider demonstrated that it has a strategy for the training product reviewed; however, ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The provider's strategy did not ensure that the target group(s), and student characteristics are clearly identified as it identified multiple target groups, which ranged from unemployed through to those working in the industry. Each strategy needs to be tailored to meet the needs of each target group.

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

## Evidence analysis

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.

### *SHB30416 Certificate III in Hairdressing*

The provider demonstrated that it has a strategy for the training product reviewed; however, ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The Australian Qualifications Framework (AQF) volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes for each qualification type and describes how long a student who does not hold the competencies identified in the relevant units of competency would take to develop all of the required skills and knowledge. 'Volume of learning' includes all teaching, learning and assessment activities that a typical student must undertake to achieve the learning outcomes. For example:
  - Certificate III: 1 – 2 year (1200 – 2400 hours).

The provider's current volume of learning (a total of 1128 hours) includes the following:

- 624 hours of training, delivery, learning and assessment
- 18 hours of monitoring contact by the provider
- 208 hours of reading, research, case studies and project work.

The qualification is to be delivered over 78 weeks.

While the course duration meets the AQF recommendations, the 1128 volume of learning hours falls short of the recommended 1200-2400 hours. A shorter volume of learning hours may be appropriate; however, the provider has not provided a rationale for the above training product, which justifies why the volume of learning varies significantly from the description outlined in the AQF volume of learning, and is suitable for its target group(s).

- The provider's strategy did not ensure that the target group(s), and student characteristics are clearly identified as it identified multiple target groups, which ranged from unemployed through to those working in the industry. Each strategy designed needs to be tailored to meet the needs of each target group.

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.

### *SHB50216 Diploma of Salon Management*

The provider demonstrated that it has a strategy for the training product reviewed; however, ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The Australian Qualifications Framework (AQF) volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes for each qualification type and describes how long a student who does not hold the competencies identified in the relevant units of competency would take to develop all of the required skills and knowledge. 'Volume of learning' includes all teaching, learning and assessment activities that a typical student must undertake to achieve the learning outcomes. For example:
  - Diploma: 1 – 2 year (1200 – 2400 hours).

The provider's current volume of learning (a total of 555 hours) includes the following:

- 182 hours of training, delivery, learning and assessment
- 6 hours of monitoring contact by the provider
- 156 hours of reading, research, portfolio work and practice.



## Evidence analysis

The qualification is to be delivered over 26 weeks.

While a shorter volume of learning may be appropriate, the provider has not provided a rationale for the above training product, which justifies why the volume of learning varies significantly from the description outlined in the AQF volume of learning, and is suitable for its target group(s).

- The provider's strategy did not ensure that the target group(s), and student characteristics are clearly identified as it identified multiple target groups, which ranged from unemployed through to those working in the industry. Each strategy designed needs to be tailored to meet the needs of each target group.

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.

### *HLTAID003 Provide first aid*

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.
- The provider has not provided a rationale for the above training product, which justifies how the selection of eight hours volume of learning, is appropriate for its target group.

### *HLTINFCOV001 Comply with infection prevention and control policies and procedures*

The provider must ensure that the amount of training provided to students is sufficient to enable them to meet the requirements of each training product, and gain the skills and knowledge specified in the training product. ASQA cannot be satisfied that each learner will be able to meet the requirements for each unit of competency in which they are enrolled because:

- The strategy does not separate training from assessment. As the time allocated for assessment is not identified, the actual amount of training cannot be confirmed.
- The provider has not provided a rationale for the above training product, which justifies how the selection of eight hours volume of learning, is appropriate for its target group.
- The strategy does not identify how the provider intends to ensure that the assessment condition that *'skills must be demonstrated in the workplace with the addition of simulations where the full range of contexts and situations have not been provided in the workplace or may occur only rarely'* will be met. Furthermore, the strategy does not ensure that only students with access to their workplace for assessment will be accepted into the course.

## Audit finding

### *Not compliant*

The provider has not demonstrated that its strategy and practices, including the amount of training, are consistent with the requirements of the training package and enable the students to meet the training package requirements.

## Action required

Provide evidence that demonstrates:

- The provider has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

- Rectification report (Final)
- Annex A TAS *CHC33015 Certificate III in Individual Support* (Classroom Based) v2.0 August 2019
- Annex B TAS *CHC43015 Certificate IV in Ageing Support* (Classroom Based v.
- Annex C TAS *CHC43114 Certificate IV in Disability* (Classroom Based) v2.0 October 2020
- Annex D TAS *CHC52015 Diploma of Community Services* (Classroom Based) v2.0 October 2020
- Annex E TAS *SHB30416 Certificate III in Hairdressing* (Classroom Based – Part Time Students) v.6.9 October 2020
- Annex F TAS *SHB50216 Diploma of Salon Management* (Classroom Based) v5.0 October 2020
- Annex G TAS *HLTAID003 Provide First Aid* v.1.0 July 2020
- Annex H TAS *HLTINFCOV001 Comply with infection prevention and control policies and procedures* v.1.1 October 2020.

### Evidence analysis

- The organisation has addressed the non-compliance for future students.

### Finding following additional evidence

*Compliant*

## National Code - Standard 11

**Additional registration requirements: This standard sets out that registered providers must continue to meet the requirements for CRICOS registration and ensure the ESOS agency for the registered provider approves, and has up-to-date information on, specific aspects of the registered provider's operations and any registered courses.**

### Standard 11.2

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

In seeking approval under 11.1, the provider must demonstrate any matters requested by the ESOS agency, including through the designated State authority if the provider is a school, which may include but are not limited to the following:

- 11.2.1 the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority
- 11.2.2 the expected duration of the course includes any holiday periods or any work-based training
- 11.2.3 any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students
- 11.2.4 the course is not to be delivered entirely by online or distance learning
- 11.2.5 the provider and any partner they engage to deliver a course or courses to overseas students has adequate staff and education resources, including facilities, equipment, learning and library resources and premises as are needed to deliver the course to the overseas students enrolled with the provider

11.2.6 the maximum number of overseas students proposed by the provider for the location reflects the appropriateness of the staff, resources and facilities for the delivery of the course.

#### **Key sources of evidence relevant to finding**

- *SHB30416 Certificate III in Hairdressing*
  - *SHB30416 Certificate III in Hairdressing* (international students) – TAS, version 5.0 June 2019
- *SHB50216 Diploma of Salon Management*
  - *SHB50216 Diploma of Salon Management* (international students) – TAS, version 4.0 June 2019.

#### **Evidence analysis**

Providers are required to develop and implement approaches that ensure students gain all relevant skills and knowledge.

*SHB30416 Certificate III in Hairdressing*  
*SHB50216 Diploma of Salon Management*

The provider demonstrated that it has strategies for the training products reviewed; however, ASQA cannot be satisfied that the provider ensures a minimum of 20 scheduled course contact for its overseas student cohort, as this has not been specified in their strategy.

#### **Audit finding**

*Not compliant*

The provider has not demonstrated that its training and assessment strategies ensure a minimum of 20 scheduled course contact for its overseas student cohort.

#### **Action required**

Provide evidence that demonstrates:

- The provider has corrected its training and assessment strategies to ensure a minimum of 20 scheduled course contact for its overseas student cohort.

### **Additional evidence provided in response to audit report**

#### **Key sources of evidence relevant to findings**

- Annex I SHB30416 Certificate III in Hairdressing (International Students) v.6.0 October 2020
- Annex J SHB50216 Diploma of Salon Management (International Students) v.5.0 October 2020.

#### **Evidence analysis**

- The organisation has addressed the non-compliance for future students.

#### **Finding following additional evidence**

*Compliant*

## Standards for RTOs - Standard 1

The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.

### Clause 1.8

Audit 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.

#### Key sources of evidence relevant to finding

##### **SHB30416 Certificate III in Hairdressing**

###### *SHBHCU001 Design haircut structures*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 5.0, July 2019
  - Student assessment book, version 5.0, July 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: observation
    - Assessment task 3: portfolio.
- Completed student assessment records for:
  - YC (HEO00000FV)
  - NGFN (HEO00000M2)
  - LT (HEO00000KB)
  - AC (HEO00000GT).

###### *SHBHTRI001 Identify and treat hair and scalp conditions*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 5.0, July 2019
  - Student assessment book, version 5.0, July 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: observation
    - Assessment task 3: portfolio.
- Completed student assessment records for:
  - YC (HEO00000FV)
  - NGFN (HEO00000M2)
  - LT (HEO00000KB)
  - AC (HEO00000GT).

##### **SHB50216 Diploma of Salon Management**

###### *BSBHHRM506 Manage recruitment selection and induction processes*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 3.0 May 2019
  - Student assessment book, version 3.0 May 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: project
    - Assessment task 3: project
    - Assessment task 4: project.

### **Key sources of evidence relevant to finding**

- Completed student assessment records for:
  - MM (HEO000004E)
  - NSMZ (HEO000005D).

#### *BSBMGT502 Manage people performance*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 3.0 May 2019
  - Student assessment book, version 3.0 May 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: project
    - Assessment task 3: project
    - Assessment task 4: project.
- Completed student assessment records for:
  - MM (HEO000004E)
  - NSMZ (HEO000005D).

#### **CHC33015 Certificate III in Individual Support**

##### *CHCCCS015 Provide individualised support*

- Assessment tools:
  - Trainer marking, and mapping document, version 2.0 June 2019
  - Student assessment book, version 2.0 June 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: case study/role play
    - Assessment task 3: work place project
    - Assessment task 4: work placement observation.
- Completed student assessment records for:
  - TZ (HEO00000DH)
  - JC (HEO00000UV)
  - YBP (HEO00000R9)
  - AA (HEO00000M8)
  - XW (HEO00000UT).

#### *CHCDIV001 Work with diverse people*

- Assessment tools:
  - Trainer marking, and mapping document, version 2.0 June 2019
  - Student assessment book, version 2.0 June 2019
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: case studies
    - Assessment task 3: project – cultural reflections
    - Assessment task 4: project – cultural research
    - Assessment task 5: work placement observation.
- Completed student assessment records for:
  - TZ (HEO00000DH)
  - JC (HEO00000UV)
  - YBP (HEO00000R9)
  - AA (HEO00000M8)
  - XW (HEO00000UT).

#### **CHC43115 Certificate IV in Disability**

##### *CHCCCS015 Provide individualised support*

- Assessment tools:
  - Trainer marking, and mapping document, version 2.0 June 2019

## **Key sources of evidence relevant to finding**

- Student assessment book, version 2.0 June 2019
- Assessments:
  - o Assessment task 1: written questions
  - o Assessment task 2: case study/role play
  - o Assessment task 3: work place project
  - o Assessment task 4: work placement observation.

### *CHCLEG003 Manage legal and ethical compliance*

- Assessment tools:
  - Trainer marking guide and mapping document, version 1.0 July 2020
  - Student assessment book, version 1.0 July 2020
  - Assessments:
    - o Assessment task 1: written questions
    - o Assessment task 2: case students
    - o Assessment task 3: project (part A, and part B).

### **CHC43015 Certificate IV in Ageing Support**

#### *CHCAGE005 Provide support to people living with dementia*

- Assessment tools:
  - Trainer marking guide and mapping document, version 2.0 June 2019
  - Student assessment book, version 2.0 June 2019
  - Assessments:
    - o Assessment task 1: written questions
    - o Assessment task 2: case students
    - o Assessment task 3: role plays
    - o Assessment task 4: behaviour management plan
    - o Assessment task 5: project – dementia diseases
    - o Assessment task 6: project – working with clients with dementia.

### *CHCLEG003 Manage legal and ethical compliance*

- Assessment tools:
  - Trainer marking guide and mapping document, version 1.0 July 2020
  - Student assessment book, version 1.0 July 2020
  - Assessments:
    - o Assessment task 1: written questions
    - o Assessment task 2: case students
    - o Assessment task 3: project (part A, and part B).

### **CHC52015 Diploma of Community Services**

#### *CHCCCS007 Develop and implement service programs*

- Assessment tools:
  - Trainer marking guide and mapping document, version 1.0 July 2020
  - Student assessment book, version 1.0 July 2020
  - Assessments:
    - o Assessment task 1: written questions
    - o Assessment task 2: project and role play
    - o Assessment task 3: project
    - o Assessment task 4: project
    - o Assessment task 5: project and role play.

### *CHCLEG003 Manage legal and ethical compliance*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 1.0 July 2020
  - Student assessment book, version 1.0 July 2020
  - Assessments:
    - o Assessment task 1: written questions
    - o Assessment task 2: case students
    - o Assessment task 3: project (part A, and part B).

## Key sources of evidence relevant to finding

### *HLTINFCOV001 Comply with infection prevention and control policies and procedures*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 1.0 July 2020
  - Student assessment book, version 1.0 May 2020
  - Assessment record tool, version 1.0 May 2020
  - Assessments:
    - Assessment task 1: written questions
    - Assessment task 2: case study
    - Assessment task 3: role play
    - Assessment task 4: journal and observation (part A, and part B).

### *HLTAID003 Provide first aid*

- Assessment tools:
  - Trainer marking guide, and mapping document, version 1.0 July 2020
  - Student assessment book 2, version 1.0 July 2020
  - Student assessment book 2, version 1.0 July 2020
  - Group observation sheet, version 1.0 July 2020
  - Assessments:
    - Assessment task 1: first aid scenarios, and demonstrations
    - Assessment task 2: incident report
    - Assessment task 3: theory test.

## Evidence analysis

A provider must develop and implement a system to ensure:

- All assessment requirements of the relevant training package are met
- The Principles of Assessment, and Rules of Evidence are applied in the assessment practices.

The Principles of Assessment require that no matter which assessment pathway or method a provider uses, the principles of fairness, flexibility, validity and reliability must be met. The Rules of Evidence require that the evidence used to make a decision about competence must be valid, sufficient, authentic, and current.

The evidence does not support that the provider has implemented an assessment system that ensures assessment complies with the assessment requirements of the relevant training package and is conducted in accordance with the Principles of Assessment, and Rules of Evidence.

### *SHBHCUT001 Design haircut structures*

### *SHBHTRI001 Identify and treat hair and scalp conditions*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable)
  - Reassessment opportunities.

### *SHBHCUT001 Design haircut structures*

- The assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Knowledge evidence – ‘*meaning of the following key terminology for haircuts and how these features are used in the hair cutting process – natural fall*’. The mapping document indicates that this element is only assessed in assessment task 3 where the students are required to submit a

## Evidence analysis

portfolio. The assessment tool does not include any other forms of assessment to assess the student's knowledge on this element.

- Knowledge evidence – *'shape and structure for these types of haircut structures: solid form, graduated, increased layered, uniform layered'*. The mapping document indicates that this element is only assessed in assessment task 3 where the students are required to submit a portfolio. The assessment tool does not include any other forms of assessment to determine the student's knowledge on this element.

### SHBHTRI001 Identify and treat hair and scalp conditions

- The assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Knowledge evidence – *'common abnormal scalp conditions, symptoms and visual signs: head lice, scabies, ringworm, dry or oily dandruff, seborrhoea, psoriasis'*. The mapping document indicates that this element is assessed in questions 8, and 15 of assessment task 1. Question 8 requires the student to *'identify at least 4 abnormal scalp conditions'*, and question 15 requires the student to *'identify at least 4 symptoms of common hair and scalp conditions'*. The questions combined do not ensure that knowledge of all six common abnormal scalp conditions, symptoms, and visual signs will be assessed, as the student only has to provide a response for four to be deemed satisfactory.
  - Performance evidence – *'complete a hair and scalp analysis on five different clients to determine suitable salon treatment options and products for: chemically treated hair, physically damaged hair, highly stressed hair, hair conditions that would benefit from protein and moisture treatments'*. While the assessment tool, specifically assessment task 3, requires the student to complete a hair and scalp analysis on five different clients, it is unclear how the provider's current assessment system ensures that all five different hair and scalp conditions will be covered as part of the student's assessment, as these assessments are conducted on random walk-in clients. As such, it cannot be ensured that all students would have access to clients with the five different hair and scalp conditions as mandated in the training package during the assessment process. Further, the assessment tool does not include any instructions for simulations to address this assessment gap if required.
- The assessment practices for the following students do not confirm the provider had conducted adequate assessment of the students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment, and the Rules of Evidence. For example, but not limited to:
  - LT (HEO00000KB):
    - Assessment task 1, question 8 (*'List at least four (4) abnormal scalp conditions'*). The student has only listed three abnormal scalp conditions, and was marked as satisfactory.
    - Assessment task 1, question 22 (*'In your own words, explain why it is important to keep and maintain client records?'*). The marking guide response states *'Response should reflect the following: Up to date client cards are an important part of running a salon, they are used so you know what treatments or services have been provided previously. Also to keep record of any allergic reactions to previous treatments or details of treatments the client was happy with. Accurate client records should also be kept as a record in case the client has an adverse reaction or you need to contact them regarding an infection control breach'*. The student's response included *'put the customer ditails [sic] on computer more the easy to for nextim [sic]*. The response did not meet the expected response, and was marked as satisfactory.
    - Assessment task 1, question 28 (*'Explain how you would clean and disinfect work surfaces'*). The model response states *'Responses should include: Wipe over surfaces with warm soapy water; Use alcohol wipes or solution and wipe down the surface'*. The student's response included *'clean hair salon. Every way disinfection [sic]*, and was marked as satisfactory.



## Evidence analysis

*BSBHRM506 Manage recruitment selection and induction processes*  
*BSBMGT502 Manage people performance*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable).

*CHCCCS015 Provide individualised support*

*CHCDIV001 Work with diverse people*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable)
  - Detailed instructions on work placement, by way of example, the exclusion of including break hours as part of the 120 hours. The impact on the lack of detailed instructions is reflected in the findings below under assessment practices.
- The assessment practices for the following students did not confirm the provider had conducted adequate assessment of the students to ensure they were competent against all requirements of the training product, and that the assessment was conducted in accordance with the Principles of Assessment, and the Rules of Evidence.  
As part of the training package rules for *CHC33015 Certificate III in Individual Support*, students are required to complete 120 hours of work placement. In assessing the student assessments, it was identified that three out of the five students sampled did not complete the full 120 hours of work placement as they included break times as part of their work placement hours. This applied to the following students:
  - TZ (HEO00000DH): This student included all 30 minute breaks as part of work placement hours. When the total break times have been excluded, this student completed a total of 112.5 hours out of the required 120 hours.
  - YBP (HEO00000R9): This student's timesheet included an entry with a starting time as 9am, and break hours as 1pm to 1.30pm; however, no end time for this shift was included. As such, it cannot be confirmed that this student met the full work placement requirement of 120 hours.
  - XW (HEO00000UT): This student included all 30 minute breaks as part of work placement hours. When the total break times have been excluded, this student completed a total of 112.5 hours out of the required 120 hours.

*CHCCCS015 Provide individualised support*

- The provider submitted a mapping document to demonstrate how it assesses all the elements within the unit of competency; however, the questions do not align with the element(s) it intends to assess. For example, but not limited to:
  - Performance criteria 2.3 – '*Assemble equipment as and when required according to established procedures and the individualised plan*' is mapped to assessment task 1, question 16 where the task is to identify people whom the student may work alongside.
  - Performance criteria 2.7 – '*Provide assistance to maintain a clean and comfortable environment*' is mapped to assessment task 1, question 6 – '*What documentation are you required to complete as part of providing client support? Provide 3 examples*'.
  - Performance criteria 3.1 – '*Monitor own work to ensure the required standard of support is maintained*' is mapped to assessment task 1, question 6, and assessment task 2, item 16 where it focuses on the review of the patient's plans.
  - Performance criteria 4.6 – '*Store information according to organisation policy and protocols*' is mapped to assessment task 1, question 13 – '*When risks are identified in the workplace, who are they reported to? Provide three examples*'.

## Evidence analysis

- The assessment practices for the following students do not confirm the provider had conducted adequate assessment of the students to ensure they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment, and the Rules of Evidence. For example, but not limited to:
  - Assessment task 1, question 12 requires the student to *'Describe a situation where you or a client has experienced a risk to health and safety. Explain how this was managed'*. Students JC (HEO00000UV), AA (HEO00000M8), and YBP (HEO00000R9)'s responses were identical, or similar to the response from the marking guide, and provided no reflection of their own experiences, yet marked as satisfactory.

### *CHCLEG003 Manage legal and ethical compliance*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable).

### *CHCAGE005 Provide support to people living with dementia*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable).
- The assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Knowledge evidence – *'Progression of dementia and potential impact on the person with dementia, their family and significant others, including: depression, loss and grieving, anger, despair, social embarrassment a family member might feel, isolation, financial burden on the family, social devaluation'*. This element is assessed under question 12 of assessment task 1 where the student is required to *'discuss each of the following emotions that may be felt by a person with dementia or their family members'*. This question does not fully address the knowledge evidence above as it provides the student with an option of either answering from the perspective of the person with dementia, or their family members, and not both as required.
- The provider submitted a mapping document to demonstrate how it assesses all the elements within the unit of competency; however, the questions do not align with the element(s) it intends to assess. For example, but not limited to:
  - Knowledge evidence – *'competency and image enhancement as a means of addressing devaluation'* is mapped to questions 4b to 4d in assessment task 1 where the questions are required to provide a response to people who tend to wander.
- The observation checklist for assessment task 3 does not contain sufficient performance benchmarks for each skill and/or behaviour to be demonstrated. For example, but not limited to:
  - *'Discuss martin's behaviours of concern and his possible triggers with the team?'*
  - *'Contribute to team's discussion about martin's care planning and review?'*
  - *'Discuss with team how to plan a person-centred approach with the aim of minimizing the behaviours of concern and reduce the impact on client and care staff?'*

It is unclear what the exact benchmarks are for a student to be deemed satisfactory, and 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.

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:

## Evidence analysis

- As part of assessment task 6, the students are required to complete a journal that documents what they have completed at the workplace. This journal is then signed off by a supervisor as confirmation; however, no instructions have been provided to the supervisor to explain what is to be observed to validate the content in the student's journal.

### *CHCCCS007 Develop and implement service programs*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable).
- The assessment tool does not provide any guidance or instructions to trainers, and assessors in regards to the assessment condition (*'modelling typical workplace conditions and contingencies, including interactions with users of the service and co-workers from a range of diverse backgrounds'*) to ensure that this assessment condition will be met, and to ensure reliability across all assessors.

### *HLTINFCOV001 Comply with infection prevention and control policies and procedures*

- The assessment tools do not provide essential information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - If the assessment is to be conducted in class or in the student's own time
  - Assessment duration (where applicable)
  - As part of assessment task 4, the students are required to complete a journal that documents what they have completed at the workplace. This journal is then signed off by a supervisor as confirmation; however, no instructions have been provided to the supervisor to explain what is to be observed to validate the content in the student's journal.
- The assessment tools do not address all unit of competency requirements. This assessment task does not match the assessment requirements as it is not appropriate to assess a student's ability to carry out a task by simply requiring them to describe how they would undertake the task. For example, but not limited to:
  - Performance criteria 1.2 – *'Implement hand care procedures and cover cuts and abrasions'*. This element is assessed under question 13 of assessment task 2 (*'Imagine you identified a laceration on Sarah's hands that was bleeding. Explain the hand care procedure you would follow'*).
  - Performance criteria 1.4 – *'Follow procedures for respiratory hygiene and cough etiquette'*. This element is assessed under question 14 in assessment task 2 (*'Sarah was suffering from cold and flu. Explain the procedures for respiratory hygiene and cough etiquette in this situation'*).
  - Performance criteria 1.6 – *'Follow procedures for handling, transporting and processing of linen in a manner that controls the spread of infection'*. This element is assessed under question 7 of assessment task 1 where the student is required to describe the standard precautions of handling linen, and in a case study in assessment task 2.

## Audit finding

### *Not compliant*

The provider has not demonstrated that it implements an effective assessment system that ensures all its assessment tools, and assessment practices meet the Principles of Assessment, and Rules of Evidence.

## Action required

Provide evidence that demonstrates:

- The provider has amended its assessment system and practices (to comply with the Standards for RTOs, Clause 1.8) for future students. The evidence to be provided must:

## Action required

- include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant
- demonstrate the provider will implement an assessment system that ensures assessment:
  - o complies with the assessment requirements of the relevant training product(s)
  - o will be conducted in accordance with the Principles of Assessment, and the Rules of Evidence.
- The provider has carried out remedial action to identify and address the impact the non-compliance may have caused to student LT (HEO00000KB) in *SHBHTRI001 Identify and treat hair and scalp conditions* that was assessed in a manner that did not meet the requirements of Clause 1.8. Further, remedial action needs to cover current students, and students who were assessed by the provider in the three months preceding the date of audit (21 September 2020) for *SHBHTRI001 Identify and treat hair and scalp conditions*.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

*SHBHCUT001 Design haircut structures*

*SHBHTRI001 Identify and treat hair and scalp conditions*

- Assessment tools:
  - Annex K-i SHBHCUT001 Student Assessment Book
  - Annex K-ii SHBHCUT001 Assessment Record Tool
  - Annex K-iii SHBHCUT001 Trainer Marking and Mapping Guide
  - Annex K-iv SHBHCUT001 RPL Kit
  - Annex L-i SHBHTRI001 Student Assessment Book
  - Annex L-ii SHBHTRI001 Assessment Record Tool
  - Annex L-iii SHBHTRI001 Trainer Marking and Mapping Guide
  - Annex L-iv SHBHTR001 RPL Kit.

*SHBHTRI001 Identify and treat hair and scalp conditions*

- Assessment tool and remedial actions:
  - Annex L-I SHBHTRI001 Student Assessment Book
  - Annex M LT (HEO00000KB) Remedial action.

*BSBHRM506 Manage recruitment selection and induction processes*

*BSBMGT502 Manage people performance*

- Assessment tools:
  - Annex N-i BSBHRM506 Student Assessment Book
  - Annex N-ii BSBHRM506 Assessment Record Tool
  - Annex N-iii BSBHRM506 Trainer Marking and Mapping Guide
  - Annex N-iv BSBHRM506 RPL Kit
  - Annex O-i BSBMGT502 Student Assessment Book
  - Annex O-ii BSBMGT502 Assessment Record Tool
  - Annex O-iii BSBMGT502 Trainer Marking and Mapping Guide
  - Annex O-iv BSBMGT502 RPL Kit.

*CHCCCS015 Provide individualised support*

*CHCDIV001 Work with diverse people*

- Assessment tools:
  - Annex P-i CHCCCS015 Student Assessment Book
  - Annex P-ii CHCCCS015 Assessment Record Tool
  - Annex P-iii CHCCCS015 Trainer Marking and Mapping Guide
  - Annex P-iv CHCCCS015 RPL Kit
  - Annex Q-i CHCDIV001 Student Assessment Book
  - Annex Q-ii CHCDIV001 Assessment Record Tool
  - Annex Q-iii CHCDIV001 Trainer Marking and Mapping Guide
  - Annex Q-iv CHCDIV001 RPL Kit
  - Annex R-i CHC33015 Work placement Booklet.

## Key sources of evidence relevant to findings

*CHCLEG003 Manage legal and ethical compliance*

*CHCAGE005 Provide support to people living with dementia*

- Assessment tools:
  - Annex S-i CHCLEG003 Student Assessment Book
  - Annex S-ii CHCLEG003 Assessment Record Tool
  - Annex S-iii CHCLEG003 Trainer Marking and Mapping Guide
  - Annex S-iv CHCLEG003 RPL Kit
  - Annex T-i CHCAGE005 Student Assessment Book
  - Annex T-ii CHCAGE005 Assessment Record Tool
  - Annex T-iii CHCAGE005 Assessor Guide and Mapping
  - Annex T-iv CHCAGE005 RPL Kit.

*CHCCCS007 Develop and implement service programs*

- Assessment tools:
  - Annex U-i CHCCCS007 Student Assessment Book
  - Annex U-ii CHCCCS007 Assessment Record Tool
  - Annex U-iii CHCCCS007 Trainer Marking and Mapping Guide
  - Annex U-iv CHCCCS007 RPL Assessor Kit.

*HLTINFCOV001 Comply with infection prevention and control policies and procedures*

- Assessment tools:
  - Annex V-i HLTINFCOV001 Student Assessment Book
  - Annex V-ii HLTINFCOV001 Assessment Record Tool
  - Annex V-iii HLTINFCOV001 Marking and Mapping Guide
  - Annex V-iv HLTINFCOV001 RPL Kit.

- Annex W Remedial Action and Gap Assessment

## Evidence analysis

- The organisation has addressed the non-compliance for future students.
- The organisation has planned and carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students.

## Finding following additional evidence

*Compliant*

## Trainer and assessor competency

### Standards for RTOs - Standard 1

**The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.**

#### Clause 1.13

**Audit 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.

**Clause 1.14**

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

The RTO's training and assessment is delivered only by persons who have the training and assessment credential specified in Item 2 or Item 3 of Schedule 1.

**Clause 1.16**

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

**Key sources of evidence relevant to finding**

- Trainer and assessor files:
  - CHC33015 Certificate III in Individual Support*
    - Amir Abassi
    - Jianxia (Lily) Zhai.
  - CHC43015 Certificate IV in Ageing Support*
    - Amir Abassi
    - Jianxia (Lily) Zhai.
    - Aiwa Zhao.
  - CHC43115 Certificate IV in Disability*
    - Jianxia (Lily) Zhai
    - Aiwa Zhao.
  - CHC52015 Diploma of Community Services*
    - Jianxia (Lily) Zhai
    - Aiwa Zhao.
  - SHB30416 Certificate III in Hairdressing*
    - Jun Woon Wong
    - Kushini Abeysekera.
  - SHB50216 Diploma of Salon Management*
    - Grazia (Grace) Romanin.
  - HLTAID003 Provide first aid*
    - Amir Abassi
    - Jianxia (Lily) Zhai.
  - HLTINFCOV001 Comply with infection prevention and control policies and procedures*
    - Amir Abassi
    - Jianxia (Lily) Zhai.
- Professional development planning, version 1.0 June 2019
- Interview with Compliance Manager, Michelle Armstrong.

**Evidence analysis**

The Standards specify that trainers and assessors are skilled VET practitioners with current industry skills and knowledge. This ensures students receive the training they need and graduates are properly assessed before being issued with a qualification or statement of attainment.

- The provider did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess vocational competencies to the level required by the relevant units of competency from the training package:

- CHC33015 Certificate III in Individual Support*
  - Amir Abassi:

## Evidence analysis

While this trainer holds the same qualification that they deliver, the evidence provided did not demonstrate that this trainer possesses vocational competencies for all units that they are engaged to deliver from the training package. For example, but not limited to:

- *CHCDIS002 Follow established person-centred behaviour supports*
- *CHCCCS011 Meet personal support needs.*

### - Jianxia (Lily) Zhai:

The provider utilised a trainer matrix to demonstrate this trainer's vocational competency; however, the trainer matrix heavily referenced the Nursing and Midwifery Board of Australia (NMBA)'s Registered Nurse Standards for Practice. These references did not provide sufficient detail to demonstrate that this trainer possesses all of the required elements within relevant units of competency. For example but not limited to:

- *CHCLEG001 Work legally and ethically:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 2: Engages in therapeutic and professional relationships, that advocates on behalf of people in a manner that respects the person's autonomy and legal capacity, relates directly to this unit of competence.'*
- *CHCAGE001 Facilitate the empowerment of older people:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 1: Thinks critically and analyses nursing practice, for example, RNs use a variety of thinking strategies and the best available evidence in making decisions and providing safe, quality nursing practice within person-centred and evidence-based frameworks, and Standard 2: Engages in therapeutic and professional relationships, relate directly to this unit of competence.'*
- *CHCDIS002 Follow established person-centred behaviour supports:*  
*'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 5: Develops a plan for nursing practice, relates directly to this unit of competence.'*

### *CHC43015 Certificate IV in Ageing Support*

#### - Amir Abassi:

While this trainer holds the same qualification that they deliver, the evidence provided did not demonstrate that this trainer possesses vocational competencies for all units that they are engaged to deliver from the training package. For example, but not limited to:

For example, but not limited to:

- *CHCDIS002 Follow established person-centred behaviour supports*
- *CHCDIS007 Facilitate the empowerment of people with disability*
- *CHCDIS009 Facilitate ongoing skills development using a person-centred approach.*

#### - Jianxia (Lily) Zhai:

The provider utilised a trainer matrix to demonstrate this trainer's vocational competency; however, the trainer matrix heavily referenced the Nursing and Midwifery Board of Australia (NMBA)'s Registered Nurse Standards for Practice. These references did not provide sufficient detail to demonstrate that this trainer possesses all of the required elements within relevant units of competency. For example but not limited to:

- *CHCAGE001 Facilitate the empowerment of older people:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 1: Thinks critically and analyses nursing practice, for example, RNs use a variety of thinking strategies and the best available evidence in making decisions and providing safe, quality nursing practice within person-centred and evidence-based frameworks, and Standard 2:*

## Evidence analysis

*Engages in therapeutic and professional relationships, relate directly to this unit of competence'.*

- CHCAGE003 Coordinate services for older people:
    - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 4: Comprehensively conducts assessments, as a RN, I accurately conduct comprehensive and systematic assessments. I analyse information and data and communicate outcomes as the basis for practice, and Standard 5: Develops a plan for nursing practice, relate directly to this unit of competence'.*
  - CHCAGE004 Implement interventions with older people at risk:
    - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 4: Comprehensively conducts assessments, as a RN, I accurately conduct comprehensive and systematic assessments. I analyse information and data and communicate outcomes as the basis for practice, Standard 5: Develops a plan for nursing practice, and Standard 6: Provides safe, appropriate and responsive quality nursing practice, relate directly to this unit of competence'.*
  - CHCAGE005 Provide support to people living with dementia:
    - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 4: Comprehensively conducts assessments, as a RN, I accurately conduct comprehensive and systematic assessments. I analyse information and data and communicate outcomes as the basis for practice, Standard 5: Develops a plan for nursing practice, and Standard 6: Provides safe, appropriate and responsive quality nursing practice, relate directly to this unit of competence'.*
- Aiwa Zhao:  
The provider did not provide evidence to demonstrate this trainer possesses vocational competencies to the level required by the relevant units of competency from the training package. When asked, the Compliance Manager advised that they have only recently engaged this trainer, and as such, are still awaiting further information related to their trainer file.

### CHC43115 Certificate IV in Disability

- Jianxia (Lily) Zhai:  
The provider utilised a trainer matrix to demonstrate this trainer's vocational competency; however, the trainer matrix heavily referenced the Nursing and Midwifery Board of Australia (NMBA)'s Registered Nurse Standards for Practice, These references did not provide sufficient detail to demonstrate that this trainer possesses all of the required elements within relevant units of competency. For example but not limited to:
- CHCPRP001 Develop and maintain networks and collaborative partnerships:
    - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 2: Engages in therapeutic and professional relationships, RN practice is based on purposefully engaging in effective therapeutic and professional relationships. This includes collegial generosity in the context of mutual trust and respect in professional relationships, relates directly to this unit of competence'.*
- Aiwa Zhao:  
The provider did not provide evidence to demonstrate this trainer possesses vocational competencies to the level required by the relevant units of competency from the training package. When asked, the Compliance Manager advised that they have only recently engaged this trainer, and assessor, and as such, are still awaiting further information related to their trainer file.



## Evidence analysis

### *CHC52015 Diploma of Community Services*

- Jianxia (Lily) Zhai:

The provider utilised a trainer matrix to demonstrate this trainer's vocational competency; however, the trainer matrix heavily referenced the Nursing and Midwifery Board of Australia (NMBA)'s Registered Nurse Standards for Practice, These references did not provide sufficient detail to demonstrate that this trainer possesses all of the required elements within relevant units of competency. For example but not limited to:
- o *CHCDIV003 Manage and promote diversity:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 1: Thinks critically and analyses nursing practice. RNs use a variety of thinking strategies and the best available evidence in making decisions and providing safe, quality nursing practice within person-centred and evidence-based frameworks. 1.3 respects all cultures and experiences, which includes responding to the role of family and community that underpin the health of Aboriginal and Torres Strait Islander peoples and people of other cultures, relates directly to this unit of competence'.*
- o *CHCCOM003 Develop workplace communication strategies:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 2: Engages in therapeutic and professional relationships, RN practice is based on purposefully engaging in effective therapeutic and professional relationships. This includes collegial generosity in the context of mutual trust and respect in professional relationships, relates directly to this unit of competence'.*
- o *CHCDEV002 Analyse impacts of sociological factors on clients in community work and services:*
  - *'Current AHPRA Registered Nurse (Division 1), General, 2018 - 2021. When applying for this registration, I demonstrated that I met the requirements for the Nursing and Midwifery Board of Australia's (NMBA) Registered nurse standards for practice. Standard 1: Thinks critically and analyses nursing practice, including 1.1 accesses, analyses, and uses the best available evidence, that includes research findings, for safe, quality practice, relates directly to this unit of competence'.*

### *SHB50216 Diploma of Salon Management*

- Grazia (Grace) Romanin:

The provider utilised a trainer matrix to demonstrate this trainer's vocational competency; however, the trainer matrix did not provide sufficient detail to demonstrate that this trainer possesses all the required elements within relevant units of competency. For example but not limited to:
- o *BSBHRM506 Manage recruitment selection and induction processes:*
  - *'In my role as Salon Manager or Heading Out Salon and Victorian International Academy Salon I have demonstrated the competencies of this unit by:*
    - *Identifying when we need to recruit new team members*
    - *I participate in interviews, and selection of new staff and manage the induction process*
    - *Comply with relevant legislation and organisational requirements during recruitment and induction processes'.*
- o *BSBSUS501 Develop workplace policy and procedures for sustainability:*
  - *'In my role as Salon Manager or Heading Out Salon and Victorian International Academy Salon I have demonstrated the competencies of this unit by:*
    - *Planning and Implementing sustainability policy and procedures*
    - *Record Keeping, reviewing and improving processes*
    - *Reviewing and Improving sustainability practices*
    - *Interpreting environmental and sustainability legislation regulations and code of practice*
    - *Explaining policy processes and practices to team members and students'*

## Evidence analysis

- *SHBXPSM003 Promote a personal services business:*
  - *'In my role as Salon Manager, I:*
    - *Review the products and services range and product mix*
    - *Select products for chosen target groups for marketing activities and rationale for choice marketing objectives*
    - *Project sales figures and profit margins*
    - *Analyse Sales budgets, Sales reports, Stock reports and Customer evaluation to inform marketing strategies'*

### *HLTAID003 Provide first aid*

- Amir Abassi:

The provider did not provide any evidence to demonstrate that this trainer possesses vocational competencies to the level required for this unit of competency.

### *HLTINFCOV001 Comply with infection prevention and control policies and procedures*

- Amir Abassi:

The provider did not provide any evidence to demonstrate that this trainer possesses vocational competencies to the level required for this unit of competency.

- The provider did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess relevant industry currency:

*CHC43015 Certificate IV in Ageing Support*

*CHC43115 Certificate IV in Disability*

*CHC52015 Diploma of Community Services*

- Aiwa Zhao:

The provider submitted this trainer's resume that indicates that they are currently working as a Critical Care Registered Nurse; however, the provider did not provide any further evidence to support this claim. When asked, the Compliance Manager advised that they have only recently engaged this trainer, and as such, are still awaiting further information related to their trainer file.

### *HLTAID003 Provide first aid*

- Amir Abassi:

The provider did not provide any evidence to demonstrate that this trainer possesses relevant industry currency.

**Auditor's note:** The Guideline 10.1 – Basic Life Support (BLS) Training mandated by the Australian Resuscitation Council (ARC) states '*all those trained in CPR should refresh their CPR skills at least annually*'. Jianxia (Lily) Zhai's *HLTAID001 Provide cardiopulmonary resuscitation* is due for renewal on 24 September 2020 to maintain industry currency.

- The provider did not provide sufficient evidence to demonstrate that the below listed trainers possess relevant, current knowledge and skills in vocational training, and learning:

*CHC43015 Certificate IV in Ageing Support*

*CHC43115 Certificate IV in Disability*

*CHC52015 Diploma of Community Services*

- Aiwa Zhao:

The provider did not provide evidence to demonstrate this trainer possesses relevant, current knowledge, and skills in vocational training, and learning. When asked, the Compliance Manager advised that they have recently engaged this trainer, and assessor, and as such, are still awaiting further information related to their trainer file.

## Evidence analysis

- The provider has not demonstrated that the below listed trainers possess credentials which meet the requirements of Clause 1.14:

*CHC43015 Certificate IV in Ageing Support*

*CHC43115 Certificate IV in Disability*

*CHC52015 Diploma of Community Services*

- Aiwa Zhao:

The provider did not provide evidence to demonstrate this trainer possesses credentials which meets the requirements of Clause 1.14. When asked, the Compliance Manager advised that they have only recently engaged this trainer, and assessor, and as such, are still awaiting further information related to their trainer file.

*SHB30416 Certificate III in Hairdressing*

- Kushini Abeysekera:

- The provider provided a copy of this trainer's testamur for *TAE40110 Certificate IV in Training and Assessment*, issued by Chisholm Institute (RTO code: 0260) on 5 September 2017. The National Register (<https://training.gov.au/Organisation/Details/0260>) indicates that this provider only had this qualification on its scope of registration from 15 September 2010 to 4 April 2017. Due to this testamur being issued past the date on this RTO's scope of registration, the validity of this qualification cannot be confirmed. When asked, the Compliance Manager advised that they are in the process of verifying this information with the relevant RTO. Further, the Compliance Manager advised that this trainer has not delivered training and assessment since March 2020.

In addition, providers must ensure that all trainers undertake professional development in VET, including competency-based training and assessment. Providers must retain evidence that all trainers and assessors have undertaken relevant professional development in VET.

The Standards do not prescribe what form this evidence takes, but providers may choose to include registers of development activities trainers and assessors have completed. While it is acknowledged that Aiwa Zhao is a new trainer, the provider did not ensure that this trainer has undertaken professional development in VET.

## Audit finding

*Not compliant*

The provider did not demonstrate that the trainers/assessors currently used by the provider meet the requirements of the Standards for RTOs (Clauses 1.13 - 1.16).

The evidence provided by the provider did not demonstrate that it has ensured that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

## Action required

Provide evidence that demonstrates:

- the provider now has appropriate processes to ensure it only uses trainers/assessors that meet the requirements of the standards to provide training and assessment (Clauses 1.13 - 1.16)
- the trainers/assessors currently used by the provider meet the requirements of the Standards for RTOs (Clauses 1.13 - 1.16)
- the provider ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment (Clause 1.16).

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

- Rectification report
- Annex X Trainer and Assessor file - Amir Abbassi
- Annex Y Trainer and Assessor file - Jianxia (Lily) Zhai
- Annex AA Trainer and Assessor file - Grazia (Grace) Romanin
- Annex X Trainer and Assessor file - Hina Jabeen
- Annex Ac P&P Trainer and Assessor v 3.0 October 2020
- Annex AB Kushini Abeysekera
- Annex AD Professional Development Planning v 2.0 November 2020.

### Evidence analysis

- The organisation has addressed the non-compliance for future students.

### Finding following additional evidence

*Compliant*

## Minor deficiencies

During the course of the audit, some minor deficiencies were noted. These were not significant such that they resulted in a finding of non-compliance against the relevant clause. They were however discussed with the provider and the provider agreed to remedy these. This included:

- The training and assessment strategy for *CHC52015 Diploma of Community Services* refers to an ACSF level 3 for language, literacy, and numeracy. During audit, the Compliance Manager advised that this was a typographical error, and that it should be an ACSF level 4.
- The training and assessment strategy for *CHC33015 Certificate III in Individual Support* refers to an incorrect code (CHCDIS008) for the unit of competency *Facilitate the empowerment of people with disability*. The correct unit code is CHCDIS007.

During the course of the response review, some additional minor deficiencies were noted. These were not significant such that they resulted in a finding of non-compliance against the relevant clause. These will need to be reviewed and remedied by the provider. This included:

- The Training and Assessment strategy for *HLTINFCOV001 Comply with infection prevention and control policies and procedures* was updated to increase the volume of learning from eight hours to 25 hours and to include six hours of work placement. It was noted that the 'Assessment' and 'Online Delivery and Assessment' sections still reference the old arrangements, which will need to be updated to reflect the latest changes.
- The Student Assessment Book and Assessor Marking Guide for *CHCCCS015 Provide individualised support* include a typographic error which states, 'You will do this task in your own time as homework – you should allow four hours to complete this task.' The timeframe allocated for this task is eight hours.