

Compliance report



Lead Education and Training Pty Ltd

RTO code: 45557
CRICOS code: N/A
Date report finalised: 28 March 2022

Compliance Report and Provider Details

Provider details

Provider's legal name:	LEAD EDUCATION AND TRAINING PTY LTD
Business/Trading name/s:	Lead Institute
RTO code:	45557
CRICOS code:	N/A

Compliance case details

Application number/s:	RENVET0005067 ADDVET0038993
Audit number:	AUDREC0011571
Compliance case reason/s:	Application - Renewal (VET)
Provider's contact details:	Dr Nina Hefford Director Nina.hefford@leadinstitute.com.au 0417 632 120
Address/es of site/s visited (if applicable):	N/A

Compliance team

Compliance Officer/s:	Bronwyn Turton
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Report Summary

This report describes ASQA's assessment of the provider's evidence submitted in response to findings of non-compliance against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs).

This Report includes consideration of a response to an opportunity to respond. It should be read in conjunction with the original Performance Assessment (audit) report dated 13 December 2021 which sets out the details of the non-compliance.

Compliance findings

Practice	Findings	Standards for RTOs (Clauses)
Training and Assessment	Compliant	1.6, 1.8, 1.9, 1.13, 1.16
	Not compliant	1.3
Marketing and Recruitment	Not compliant	4.1
Enrolment	Not compliant	5.1
Regulatory Compliance and Governance	Compliant	2.2

Training products sampled

Training Products	Mode/s of delivery/ assessment*	Current enrolments
<p><i>CHC30213 Certificate III in Education Support</i></p> <ul style="list-style-type: none"> • <i>CHCPRT001 Identify and respond to children and young people at risk</i> • <i>CHCDIV001 Work with diverse people</i> 	Face to face, workplace	20
<i>CHC30113 Certificate III in Early Childhood Education and Care</i>	Face to face, workplace	0
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Face to face, workplace	0
<i>HLTAID009 Provide cardiopulmonary resuscitation</i>	Face to face, online	10

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

Details of findings

Training and Assessment

Resources

Standards for RTOs 2015 – 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 1.3

Finding: Not compliant

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

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

Actions required of provider :

HLTAID009 Provide cardiopulmonary resuscitation

- **Establish and implement appropriate systems that are followed to ensure that, for the above training product, the provider has sufficient trainers and assessors and access to learning resources and equipment.**

CHC30213 Certificate III in Education Support

- **Establish and implement appropriate systems that are followed to ensure that, for the above training product, the provider has sufficient trainer and assessors.**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021
- Asset Register, Version 1.0, January 2022
- Lead Institute's AUDREC0011571 – Extra rectification evidence, 16/3/2022

Training and assessment strategies for:

- *CHC30213 Certificate III in Education Support*, Ver 1.2 Feb 2022

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- *HLTAID009 Provide cardiopulmonary resuscitation, Ver 1.2 Jan 2022.*

Tax invoice for:

- AED trainers (x2), Jan 2022.

Order purchase Summary, dated January 2022 for:

- Latex Gloves
- Anapen Trainer (x3)
- First aid kits – remote areas small (x3).

File documents for trainers/assessors:

- Lisa Rolls
 - Statement of attainment for HLTAID009 Provide cardiopulmonary resuscitation, certificate PLU48014, dated 12/12/2021, issued by RTO:20948, expiry date 12/12/2022
 - Trainer skills matrix, Version 1.1, January 2022.
- Leisha Daly
 - Trainer and assessor profile, Version 1.0, CEO approved 24/01/2022
 - Facilitator's Checklist, Version 1.0, January 2021, completed 28/1/2022
- Response to questions document.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had:

HLTAID009 Provide cardiopulmonary resuscitation

- sufficient trainers and assessors to deliver the training products on the providers scope of registration. Specifically, the only nominated trainer and assessor, Lisa Rolls, did not meet all of the requirements of clause 1.13
- continual access to learning resources and equipment to support learners undertaking training and assessment

CHC30213 Certificate III in Education Support

- sufficient trainers and assessors to deliver the training products on the providers scope of registration. Specifically, the only nominated trainer and assessor, Leisha Daly, did not meet the requirements of clause 1.13

On 14 February 2022, the provider submitted evidence that demonstrated:

HLTAID009 Provide cardiopulmonary resuscitation

- the trainer and assessor, Lisa Rolls has met the requirements of clause 1.13
 - the provider has purchased three first aid kits, three adrenaline auto-injectors and a quantity of latex gloves. The provider must have resources that comply with the specific requirements in the training package and the training and assessment strategy should provide guidance regarding the amount of resources needed per student per group. The
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training and assessment strategy has a list of minimum resources which are required to be confirmed and provided; however, it does not demonstrate that it has included all of the requirements of the training package. In addition, this list does not indicate the quantity of each item listed that would be required per class or align with the purchases made by the provider.

CHC30213 Certificate III in Education Support

- the trainer and assessor, Leisha Daly, has met the requirements of clauses 1.13 b) and 1.13 c). However, the evidence did not demonstrate that the trainer has met the requirements of clause 1.13a). For further detail, refer to clause 1.13.

On 2 March 2022, the provider submitted further evidence that demonstrated:

HLTAID009 Provide cardiopulmonary resuscitation

- the trainer and assessor, Lisa Rolls has met the requirements of clause 1.13
- it has an asset register which included a list of the training and assessment equipment available; the asset register submitted shows all of the resources held by the provider; however, the register does not demonstrate how this equipment aligns with the requirements of the unit of competency or the resource needs of each delivery of the unit of competency. This is a system that when fully developed may be applied across the scope of registration of the provider when ensuring it has access to sufficient resources for all of the training products on its scope of registration.

On 16 March 2022, the provider submitted further evidence that:

- explained how the asset register information aligns with the requirements of the unit of competency and the resource needs of each delivery of the unit of competency. However, the explanation has not demonstrated that the provider has a system in place to compare and analyse the physical resources required to deliver and assess a training product, at a unit of competency level, with the resources available to the provider. Such as:
 - The provider's response stated that 'at the end of each course, a count is done on what products has been used, products used are then replaced as required prior to the next course being scheduled'
 - The evidence did not demonstrate how this is done, who is responsible for the count and how the information is recorded, retained or passed on as necessary.
 - The provider's response stated that 'prior to any course commencing, the RTO confirms that equipment needed is available well in advance to the next course delivery'
 - The evidence did not demonstrate how this is done, who is responsible for checking and how the information is recorded, retained or passed on as necessary
 - In consideration of Clause 2.2, where the provider is required to systematically monitor the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1; the provider is required to have a system in place that includes ensuring sufficient resourcing occurs for the delivery of each class and each unit of competency. Whilst the provider has explained an overview of its system, the full system is not evident. Specifically, who is responsible for checking, purchasing; how does the information flow from one process to another; is the provider using the outcomes of evaluation such as student/trainer/industry feedback/changes to the training product to inform the equipment required that will be used in relation to this Clause 1.3

Finding

The provider has demonstrated that it has:

- sufficient trainers and assessors for the training products *HLTAID009 Provide cardiopulmonary resuscitation* and *CHC30213 Certificate III in Education Support*.

The provider has not sufficiently demonstrated that it has:

- a system to ensure that there is sufficient equipment to train and assess students enrolled in *HLTAID009 Provide cardiopulmonary resuscitation* as required by the training product and that these resources will accommodate the number of students in the class and be available to the learner regardless of location or mode of delivery. Whilst the provider has explained how it calculates, restocks, and has equipment available, the full system is not evident that would ensure ongoing compliance of having sufficient resources
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Industry Engagement

Standards for RTOs 2015 – 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 1.6

Finding: Compliant

The RTO implements a range of strategies for industry engagement and systematically uses the outcome of that industry engagement to ensure the industry relevance of:

- a) its training and assessment strategies, practices and resources; and
- b) the current industry skills of its trainers and assessors.

Actions required of provider :

- **Establish and implement a range of strategies for industry engagement and so that outcomes of industry engagement are used to ensure the industry relevance of:**
 - **training and assessment strategies, practices and resources; and the current industry skills of its trainers and assessors**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021

Training and assessment strategies for:

- *CHC30213 Certificate III in Education Support, Ver 1.2 Feb 2022*
- *HLTAID009 Provide cardiopulmonary resuscitation, Ver 1.2 Jan 2022.*

Industry Consultation Overview Forms for:

- *CHC30213 Certificate III in Education Support, Ver 1.0 Oct 2021, created 1 Feb 2021, last modified 7 Feb 2022*
- *HLTAID009 Provide cardiopulmonary resuscitation, Ver 1.0 Oct 2020, created 1 Feb 2021, last modified 14 Feb 2022.*

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had systematically used the outcomes of industry engagement to inform its training and assessment strategies.

On 14 February 2022, the provider submitted evidence that demonstrated:

- it has conducted consultation in accordance with its industry engagement policy and procedure to now inform its training and assessment strategies.

Finding

The provider demonstrated it systematically used the outcomes of industry engagement.

Assessment

Standards for RTOs 2015 – 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

Finding: 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.

Actions required of provider :

CHCPRT001 Identify and respond to children and young people at risk

CHCDIV001 Work with diverse people

- **Rectify assessment practices (to comply with Clause 1.8) and has established appropriate systems that are followed. The evidence to be provided must:**
 - **demonstrate the provider will implement an assessment system that ensures assessment:**
 - **complies with the requirements of the relevant training product(s)**
 - **will be conducted in accordance with the Principles of Assessment and Rules of evidence.**
 - **include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant.**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021

Assessor Guides for:

- CHCDIV001 Work with diverse people, V2, 8 Feb 2022
- CHCPRT001 Identify and respond to children and young people at risk, V2, 8 Feb 2022.

Assessment Validation Checklist for:

- CHCDIV001 Work with diverse people, V2, 30/6/2021, completed 2/2/2022
- CHCPRT001 Identify and respond to children and young people at risk, V2, 30/6/2021, completed 2/2/2022.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had developed and implemented an assessment system that ensured assessment complied with the assessment requirements of the relevant training package and was conducted in accordance with the Principles of Assessment and Rules of Evidence.

On 14 February 2022, the provider submitted evidence that demonstrated:

CHCDIV001 Work with diverse people

CHCPRT001 Identify and respond to children and young people at risk

- it has accessed, reviewed and updated new assessor guides
- it has an assessment validation checklist for assessment tools and assessment process that has been applied prior to implementing the new assessment tools
- it has reported full compliance with on post assessment validation which involved the review of samples of completed assessment undertaken in the past six months
- it has reviewed and revised its assessment validation process to include pre-assessment validation.

Finding

The provider has demonstrated its assessment system complies with the assessment requirements of the training products and would be conducted in accordance with the Principles of Assessment and the Rules of evidence.

Standards for RTOs 2015 – 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 1.9

Finding: Compliant

The RTO implements a plan for ongoing systematic validation of assessment practices and judgements that includes for each training product on the RTO's scope of registration:

- a) when assessment validation will occur;
- b) which training products will be the focus of the validation;
- c) who will lead and participate in validation activities; and
- d) how the outcomes of these activities will be documented and acted upon.

Actions required of provider :

- **Rectify validation systems and establish appropriate ongoing validation of assessment systems and judgements.**

Key sources of evidence relevant to finding

- Validation and Moderation Schedule 2020-2025
- Validation Report, Version 1.0, completed 2/2/2022
- Assessment Validation Checklist, Version 2.0, 30/6/2021, approved by Academic Manager, 2/2/2022

Training and assessment strategies for:

- *CHC30213 Certificate III in Education Support*, Ver 1.2 Feb 2022, specifically section 8.1.1
- *HLTAID009 Provide cardiopulmonary resuscitation*, Ver 1.2 Jan 2022, specifically section 8.1.1.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had implemented an appropriate validation system that reflected the requirements as defined in the Standards and had considered the outcomes of its validation activities and implemented changes accordingly.

On 14 February 2022, the provider submitted evidence that demonstrated:

- it has reviewed and revised its validation systems to include when validations of assessment practices and judgements will occur, who will lead and participate in validation and how the outcomes of these activities will be documented and acted upon to ensure assessment will be conducted in accordance with the Principles of Assessment and Rules of Evidence.

**Finding**

The provider demonstrated its validation system meets the requirements of the Standards, and that it has considered the outcomes of validation and implemented changes.

Trainers and Assessors

Standards for RTOs 2015 – 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

Finding: 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.

Actions required of provider :

HLTAID009 Provide cardiopulmonary resuscitation

CHC30213 Certificate III in Education Support

- **Ensure trainers/assessors possess vocational competencies at least to the level being delivered and assessed, current industry skills and current knowledge and skills in vocational training and learning.**
- **Establish and implement appropriate systems to ensure only trainers/assessors possessing vocational competencies at least to the level being delivered and assessed are used, with current industry skills and current knowledge and skills in vocational training and learning.**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021
- Verification of Qualifications of Trainers and Assessors Policy and Procedure, Version 3.1, 25/01/2022

File documents for trainers/assessors:

- Lisa Rolls
 - Trainer skills matrix, Version 1.1, January 2022
 - Facilitator's Checklist, Version 1.0, January 2021, completed 28/1/2022.
- Leisha Daly
 - Trainer and assessor profile, Version 1.0, CEO approved 24/01/2022
 - Facilitator's Checklist, Version 1.0, January 2021, completed 28/1/2022.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had ensured that all trainers and assessors met the requirements of clause 1.13.

On 14 February 2022, the provider submitted evidence that demonstrated:

HLTAID009 Provide cardiopulmonary resuscitation

- the trainer and assessor, Lisa Rolls has met the requirements of clause 1.13.

On 2 March 2022, the provider submitted evidence that demonstrated:

CHC30213 Certificate III in Education Support

- the trainer and assessor, Leisha Daly has met the requirements of clause 1.13.

Finding

The provider did demonstrate the trainer and assessor for *CHC30213 Certificate III in Education Support*, Leisha Daly, met the requirements of clause 1.13a) in relation to demonstrating vocational competencies at least to the level being delivered.

Standards for RTOs 2015 – 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 1.16

Finding: 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.

Actions required of provider :

- **Rectify professional development systems to ensure that all trainer and assessors currently used by the provider, 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

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021
- Trainer Professional Development Policy and Procedure, Version 3.1.

File documents for trainers/assessors:

- Lisa Rolls
 - Trainer skills matrix, Version 1.1, January 2022
 - Professional Development Schedule, V 1.0, January 2021, July 2021 to June 2022.
- Leisha Daly
 - Trainer and assessor profile, Version 1.0, CEO approved 24/01/2022
 - Professional Development Schedule, V 1.0, January 2021, July 2021 to June 2022.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider ensured that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment

On 14 February 2022, the provider submitted evidence that demonstrated:

- the provider does not have a system in place to ensure all trainers have undertaken relevant professional development in VET. Specifically:
 - the trainer matrix provided for trainer/assessor, Lisa Rolls, refers to unplanned professional development which was undertaken as part of the trainers workplace role at another organisation. The provider has not demonstrated that it has a professional development plan in place for this trainer/assessor to retain currency in

their knowledge and skills in vocational training and learning that informs their training and assessment

- the trainer and assessor suitability profile document provided for trainer/assessor, Leisha Daly, contains a section for professional development planning. The trainer/assessor was identified to participate in a series of online webinars held by Brisbane City Council regarding sustainability in Early Childhood Education and Care which was to be completed by 31 August 2021. This document was reviewed and signed by the CEO 24/01/2022. There is no entry of completion of this training in the document or an addition of any further planned training. As such, there is no evidence to demonstrate that the provider has a professional development plan in place for this trainer/assessor to retain currency in their knowledge and skills in vocational training and learning that informs their training and assessment.

On 2 March 2022, the provider submitted evidence that demonstrated:

- it has a professional development plan in place for this trainer/assessor to retain currency in their knowledge and skills in vocational training and learning that informs their training and assessment
- it has individual professional development plans in place for its trainers/assessors to retain currency in their knowledge and skills in vocational training and learning that informs their training and assessment.

Finding

The evidence reviewed demonstrated that the provider has ensured that all trainers and assessors will undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment.

Marketing and Recruitment

Standards for RTOs 2015 – Standard 4

Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients.

Clause 4.1

Finding: Not 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.

Actions required of provider :

- **Rectify information disseminated (directly or on behalf of the provider) to ensure it is both accurate and factual.**
- **Establish and implement appropriate systems to ensure that all information whether disseminated directly by the provider or on its behalf, is both accurate and factual.**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021
- Website <https://leadinstitute.edu.au/>, accessed 16/02/2022
- Lead Institute's AUDREC0011571 – Extra rectification evidence, 16/3/2022

Training and assessment strategies for:

- *CHC30213 Certificate III in Education Support*, Ver 1.2 Feb 2022
- *HLTAID009 Provide cardiopulmonary resuscitation*, Ver 1.2 Jan 2022.

CHC30213 Certificate III in Education Support

- MASTER Flyer , Fee for Service, Domestic
- Marketing Validation Form, Ver 1.0, October 2021
- Marketing Validation Form, Ver 1.0, January 2022.

HLTAID009 Provide cardiopulmonary resuscitation

- MASTER Flyer Ver 1.0 Feb 2022
- Marketing Validation Form, Ver 1.0 October 2021
- Marketing Validation Form, Ver 1.0 January 2022.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider had a systematic practice of reviewing marketing, advertising or recruitment material to ensure these materials provide clear and accurate information to prospective students.

On 14 February 2022, the provider submitted evidence that demonstrated:

- the information provided to prospective students in its advertising and recruitment materials is in alignment with its training and assessment strategies
- it has a validation checklist for marketing materials; however, there was no evidence to indicate that there is a systematic practice of reviewing marketing, advertising or recruitment material to ensure these materials provide clear and accurate information to prospective students. Specifically:

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- the marketing validation review form for *HLTAID009 Provide cardiopulmonary resuscitation* was completed by a staff member on 28 January 2022 and indicates action, in the form of review, is required against information aligning with the training and assessment strategy and that the providers website is not active. There is no further information on the form regarding the procedure or timeline for the action to be taken and the form has not been signed off by an authorised person.
 - there is inconsistency in the dates and versions noted in the document control footers of the marketing validation forms provided. The document is version 1.0 October 2021, was created 16 January 2021 and last modified 14 February 2022; however, the completed document was signed by the CEO 9 February 2022 which is prior to the document modification date. This inconsistency undermines the integrity and reliability of the document.

On 16 March 2022, the provider submitted evidence that:

- explained how the provider administers its marketing validation form as a method of validating information on its marketing flyers. However, the explanation and accompanying marketing validation form has not demonstrated that the provider has a system in place which will ensure for **all** information disseminated, and all forms of marketing used are checked and approved by an appropriate person before release or that it has a system in place to ensure all forms of marketing used are monitored to maintain currency and accuracy, including but not limited to Facebook and website information where it is not qualification specific.
- identified the marketing validation forms includes a box to write in 'Authorised Person Name and Signature', however this does not prevent a non-authorised person from writing their name, and it being accepted. Noting that one of the two forms submitted, this section was left blank with no name, and the other form had included the name of the CEO. The system does not identify who the designated authorised person is to verify the name and or role of the person including their name in the authorised person box.

Finding

Whilst the provider has marketing validation forms it did not demonstrate that it had a systematic practice of reviewing marketing, advertising or recruitment material for all information disseminated (including all training products) to ensure these materials provide clear and accurate information to prospective students that covers all areas of media that it currently uses.

A systematic process may include how often reviews are conducted, who the designated authorised person is, are there any policies and procedures that support the system.

Enrolment

Standards for RTOs 2015 – Standard 5

Each learner is properly informed and protected.

Clause 5.1

Finding: Not compliant

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

Actions required of provider :

- **Ensure that prior to enrolment or the commencement of training and assessment, whichever comes first, the provider provides advice to prospective students about the training product appropriate to meeting their needs, taking into account their individual existing skills and competencies.**
- **Establish and implement appropriate systems to ensure new students are enrolled into an appropriate training product, considering their existing knowledge, experience and skills.**

Key sources of evidence relevant to finding

- ASQA Quality Performance Assessment Report, 13 December 2021
- Evidence of Compliance, Version 1.1, November 2021
- Lead Institute's AUDREC0011571 – Extra rectification evidence, 16/3/2022
- Enrolment flow chart, Version 2, 2021

HLTAID009 Provide cardiopulmonary resuscitation

- Training and assessment strategy, Ver 1.2 Jan 2022
- MASTER Flyer Ver 1.0 Feb 2022
- Marketing Validation Form, Ver 1.0 October 2021.

Tax invoice for:

- a 12 month subscription to LLN Robot, dated 19 January 2022.

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider gave accurate information to prospective students, taking into account the individual's existing skills and knowledge.

On 14 February 2022, the provider submitted evidence that demonstrated:

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- it has purchased a subscription to assess the existing language, literacy and numeracy (LLN) knowledge of prospective students; however, the LLN assessment process has not been established and implemented. Specifically:
 - the provider did not demonstrate how it will give a prospective learner advice about the training product being appropriate to meeting the learners needs after it has conducted the assessment to inform the provider of the learners existing skills and competencies in relation to LLN prior to enrolment
 - the providers process does not include consideration of pathways to provide access to LLN support to students.

On 16 March 2022, the provider submitted evidence that demonstrated:

- the provider intends to determine whether student responses to specific AVETMIS data collection questions on its enrolment form regarding language and cultural diversity, disability and schooling history. The student responses are to be translated by the provider's administration team to determine whether the student will require further LLN assessment.

This method of administration of LLN assessment to enrolling students does not demonstrate the provider has established and implemented a systemic process or procedure that is suitable or will ensure **all** prospective learners are given advice about the appropriateness of the training product in meeting the learners needs prior to their enrolment or at commencement of their training:

- there is no accompanying demonstration of how the AVETMIS questions address the individual student's reading, writing, oral communication or numeracy skills in accordance with the requirements of the training package
 - there is no information regarding the qualifications or appropriateness of administrative persons being able to make an LLN judgement based on AVETMIS
 - there is no information as to how the provider will authenticate or interpret an LLN assessment if it is applied
 - there is no information as to how the student will be advised of the outcomes of the LLN assessment if it is applied
- the provider states that it intends to offer options to prospective students if they do not meet the required LLN for successful completion of their intended course. The options to be offered are not specified in the provider's statement. The enrolment flow chart indicates that the provider will assist the student with LLN issues internally and/or send the student to an LLN specialist. If the internal assistance or LLN specialist is unable to support the student, as per the providers process identified on its flow chart, they will not be accepted for enrolment. Specifically, the process did not demonstrate how or when the provider would give advice to the student of how the training product would be suitable for the needs of the student, any support required, and/or before not accepting the enrolment.

This approach does not demonstrate that the provider has given consideration to the possible impacts that accessing LLN support may have on the prospective student when advising them about the students LLN abilities and how this would or would not meet the LLN requirements of the training product.

Finding

Nationally accredited training products incorporate the Australian Core Skills Framework (ACSF) as a tool to give consistency of an individual's performance in the core skills of reading, writing, oral communication and numeracy (LLN). To ensure an individual student will meet these requirements at the successful completion of their training, the provider should have a system in place to identify the prospective learner's current skills and compare them with the requirements of the training product. If gaps are identified, the provider should advise the prospective student of the gaps identified and of any impacts this may have on their training, such as requiring assistance with reading skills, and whether this will attract an extra cost to them in the way of time and/or money.

The provider has not demonstrated a process that includes giving sufficient information to prospective students prior to enrolment, about the training product being appropriate to meeting the student's needs, taking into account all of the individual's existing skills, knowledge and competencies to also include LLN abilities in consideration of the actions required of the provider from the outcome of its Performance Assessment (audit), where it was required to demonstrate that it has a system to ensure students are enrolled into a training product that meets their needs, considering their existing knowledge, experience and skills. Which would also include coverage of all training products on its scope of registration

Regulatory Compliance and Governance

Staffing/ Management

Standards for RTOs 2015 – Standard 2

The operations of the RTO are quality assured.

Clause 2.2

Finding: Compliant

The RTO:

- a) systematically monitors the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1; and
- b) systematically evaluates and uses the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices. Evaluation information includes but is not limited to quality/performance indicator data collected under Clause 7.5, validation outcomes, client, trainer and assessor feedback and complaints and appeals.

Actions required of provider :

- Establish appropriate systems to monitor training and assessment strategies and practices to ensure ongoing compliance with Standard 1.
- Establish appropriate systems that are followed to evaluate and use the outcomes of the evaluations to continually improve the provider's training and assessment strategies and practices.

Key sources of evidence relevant to finding

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- ASQA Quality Performance Assessment Report, 13 December 2021
 - Evidence of Compliance, Version 1.1, November 2021
 - Findings from clauses 1.3, 1.13, 1.16, 4.1 and 5.1

Evidence analysis

The provider was found not compliant during its compliance monitoring performance assessment conducted 23 September 2021 to 2 November 2021. The evidence reviewed did not demonstrate that the provider systematically monitored the organisation's training and assessment strategies and practices to ensure ongoing compliance.

On 14 February 2022, the provider submitted evidence that demonstrated:

- it has reviewed and implemented its validation system to be compliant with clause 1.9
- it has updated its assessment tools to be compliant with clause 1.8
- it has implemented industry engagement that aligns with its policy and procedure to be compliant with clause 1.6

The additional evidence submitted by the provider did not demonstrate that it has implemented systems that:

- ensures it has access to all required resources (clause 1.3)
- ensures trainers and assessors have current knowledge and skills in vocational training and learning that informs their training and assessment (clause 1.13)
- ensures 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)
- ensures all students have access to clear and accurate information prior to enrolment (clause 4.1)
- enables the provider to give prospective students sufficient information to enable them to decide if the organisation or the course is suitable for them, based on their existing skills and competencies and any specific needs (clause 5.1)

On 2 March 2022,

The provider submitted evidence that it had omitted from its response submission that demonstrated:

- it does not have a process in place to systematically evaluate and use the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices, to ensure it has access to all required resources. Specifically, it has an asset register which included a list of the training and assessment equipment available; however, the provider did not demonstrate that there is a process for ensuring that all of the resource requirements of the training package are included. In addition, whilst the list provided does show the quantity of each item held as an asset by the provider and it does not indicate how many of each item would be required per class and per delivery. (clause 1.3)
 - it now ensures trainers and assessors have current knowledge and skills in vocational training and learning that informs their training and assessment (clause 1.13)
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- it now ensures 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).

Finding

The provider has demonstrated that it has improved its systems to systematically monitor the outcomes of evaluations in most instances to inform the organisation's training and assessment strategies and practices.

The non-compliances relating to marketing and informing students is addressed under clauses 4.1 and 5.1.

Minor deficiency

During the course of the compliance assessment, a minor deficiency was noted. This was not significant such that it resulted in a finding of non-compliance against this clause. It was however discussed with the provider and the provider agreed to remedy it, which is:

- on one occasion from the sampled audit findings the provider's system is insufficient. This is in relation to not ensuring a systematic approach to using outcomes to inform the future needs of resources (clause 1.3) required to continually improve the RTO's training and assessment strategies and practices.
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