



REPORT

Audit report: CLB Training and Development Pty Ltd as The Trustee for the CLB Unit Trust

RTO number:	21356
CRICOS number:	N/A
Date/s of site visit:	N/A
Date report created:	12/11/2020

Provider details

Provider's legal name:	CLB Training and Development Pty Ltd as The Trustee for the CLB Unit Trust
Trading names:	CLB TRAINING & DEVELOPMENT PTY LTD SPECTRA TRAINING AUSTRALIA
RTO number:	21356
CRICOS number:	N/A

Audit team

Lead auditor:	Josephine Church
Auditor:	Judith Keller

Audit details

Application number/s:	N/A
Audit number:	AUDREC0010919
Audit reason:	Compliance Monitoring
Date of opening meeting/discussion	6/11/2020
Date of closing meeting/discussion	12/11/2020
Provider's contact for audit:	Jenny Rushton CEO jenny.rushton@spectra-training.com 03 9292 8000
Address/es of site/s visited (if applicable):	N/A

Summary of audit findings

Audit finding: Concerning non-compliance

Report completed by: Josephine Church

Practice	Standards for RTOs	Finding
Training and Assessment	1.1, 1.2, 1.8*, 1.13*, 1.14, 1.16	Not compliant
Regulatory Compliance / Governance	2.3, 2.4	Compliant

*Indicates a non-compliant clause

Background

Summary of RTO and management structure:

- CLB Training and Development Pty Ltd as The Trustee for the CLB Unit Trust was initially registered as an RTO on 8 August 2003. The RTO's current registration period commenced on 13 December 2018 and expires on 11 December 2025.
- The RTO's head office is in Melbourne. The RTO's management team includes:
 - Jenny Rushton, CEO
 - Camilla Zhong, Senior Manager Finance and Compliance
 - Elaine Paguio, Group Compliance Manager
 - John Savva, National Sales Manager
 - Vikki Fox, National Training Manager.

Scope of provider's registration:

- The RTO's scope includes qualifications and one explicit unit of competency (TLI only) from the BSB, ICP, MSS, SIR and TLI training packages.

Suburb and state of all delivery sites:

- The RTO delivers nationally in all states and territories.

Third party usage:

- The RTO has one (1) third party arrangement with Monadelphous Engineering for the provision of training and assessment.

Core clients/target groups:

- Core clients dependant on sales team networks and targets
- Federal budget announcements for training and the RTO will target those contracts and core clients/target groups
- People who want a qualification delivered in the workplace who allow participants to have time away from their role and the skills will benefit the business.

Training Revenue (Funded or fee for service):

- Funded QLD, VIC, NSW, WA
- Fee for service SA, NT and ACT.

Total number of current enrolments in the organisation as at 6/11/2020: 816

- BSB42015ICP Certificate IV in Leadership and Management - 35
- BSB51918 Diploma of Leadership and Management - 2
- ICP31215 Certificate III in Printing - 112
- ICP31315 Certificate III in Print Manufacturing - 39
- ICP31415 Certificate III in Print Communications - 10
- MSS30316 Certificate III in Competitive Systems and Practices - 29
- MSS40316 Certificate IV in Competitive Systems and Practices - 39
- SIR30216 Certificate III in Retail - 173
- SIR40316 Certificate IV in Retail Management - 134
- TLI31216 Certificate III in Driving Operations - 96
- TLI31616 Certificate III in Warehousing Operations - 63
- TLI32416 Certificate III in Logistics - 9
- TLI41816 Certificate IV in Warehousing Operations - 5
- SIRRFSA001 Handle food safely in a retail environment – Nil.

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 CLB Training and Development Pty Ltd as The Trustee for the CLB Unit Trust to ASQA
- existing information and records held by ASQA concerning CLB Training and Development Pty Ltd as The Trustee for the CLB Unit Trust
- other publicly available information - including but not limited to, information published on the organisation's and third-party websites.
- Information provided by industry stakeholders and funding agency.

Training products sampled

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>ICP31215 Certificate III in Printing</i>	Workplace	112
<i>ICP31315 Certificate III in Print Manufacturing</i>	Workplace	39
<i>TLI31216 Certificate III in Driving Operations</i>	Workplace	96
<i>TLI31616 Certificate III in Warehousing Operations</i>	Workplace	63

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

Interviewees

Name	Position	Training products
Jenny Rushton	CEO	<i>ICP31215; ICP31315; TLI31216; TLI31616</i>
Camilla Zhong	Senior Manager Finance and Compliance	<i>ICP31215; ICP31315; TLI31216; TLI31616</i>
Elaine Paguio	Group Compliance Manager	<i>ICP31215; ICP31315; TLI31216; TLI31616</i>
Renee Masterton	Instructional Design Team Leader	<i>ICP31215; ICP31315; TLI31216; TLI31616</i>
Daniel Gregory	Trainer/Assessor	<i>TLI31616</i>
Peter Rivett	Trainer/Assessor	<i>ICP31315</i>
Greg May	Trainer/Assessor	<i>ICP31215 & ICP31315</i>

About this Report

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

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

Correcting a non-compliance may require:

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

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 1.8

Audit Finding: Not compliant

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

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

Key sources of evidence relevant to finding

ICP31215 Certificate III in Printing

ICPSUP216 Inspect quality against required standards

- Assessment tools:
 - AG_ICPSUP202_ICPSUP216_v3.pdf – Version 3, June 2019.
- Completed learner assessments for:
 - Learners NS and MJ.
- Other relevant documents:
 - Letter ASQA Requested Information.pdf, dated 11 November 2020.

ICP31315 Certificate III in Print Manufacturing

MSS402080 Undertake root cause analysis

- Completed learner assessments for:
 - Learners TNH (Participant Evidence Pack for equivalent, superseded unit MSS402080A).

ICPKNW322 Develop knowledge of the printing and graphic arts industry

- Assessment tools:
 - 3F AG_ICPKNW322_ICPSUP281_v2.pdf - Version 2, June 2018
 - 3G PE_ICPKNW322_ICPSUP281_v2.pdf - Version 2, June 2018
 - 3H PG_ICPKNW322_ICPSUP281_v2.pdf - Version 2, June 2018
 - 3I VM_ICPKNW322_ICPSUP281_v2.xlsx.
- Completed learner assessments for:
 - Learners AP and AM.
- Other relevant documents:
 - Letter ASQA Requested Information.pdf, dated 11 November 2020
 - Appendix D ICPKNW322 performance evidence.pdf.

TLI31616 Certificate III in Warehousing Operations

TLIL1001 - Complete workplace orientation/induction procedures

- Assessment tools:
 - AE_TLIL1001_TLIF1001_TLIF3004_TLIU2012.docx – Version 2, January 2019
 - AG_TLIL1001_TLIF1001_TLIF3004_TLIU2012.docx – Version 2, January 2019
 - PE_TLIL1001_TLIF1001_TLIF3004_TLIU2012.docx – Version 2, January 2019
 - VM_TLIL1001_TLIF1001_TLIF3004_TLIU2012.xls.
- Completed learner assessments for:
 - Learners SA, DR, PS, US.

Key sources of evidence relevant to finding

Interviews:

- Jenny Rushton, CEO
- Camilla Zhong, Senior Manager Finance and Compliance
- Peter Rivett, Trainer/Assessor – ICP31315
- Greg May, Trainer/Assessor – ICP31215 & ICP31315
- Daniel Gregory, Trainer/Assessor TLI31616
- Renee Martensen, Instructional Design Team Leader.

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 RTO 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.

A review of the RTO's evidence found that the RTO has not 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. Specifically:

ICP31215 Certificate III in Printing

ICPSUP216 Inspect quality against required standards

The evidence provided does not support that the RTO has implemented an assessment system that ensures assessment complies with the Principle of Assessment – reliability. Specifically:

- A review of completed learner assessment documents for the above unit of competency (clustered with unit *ICPSUP202*), in conjunction with interviews with the RTO's assessor, found that observations of the sampled learners' performance had not been conducted and documented in accordance with the process outlined in the RTO's assessment system for the unit, which requires the assessor to observe the learner demonstrating application of their current skills in the work environment (or simulated work environment) and to ask the learner oral questions.

In the 'Trainer/Assessor Assessment Guide' (AG_ICPSUP202_ICPSUP216_v3.pdf – Version 3, June 2019) it is stated (on page 12):

Where possible, demonstration of Participant's skills must take place in real workplace operational situations. Where this is not appropriate (e.g. incompatible workplace schedules), the demonstration must be simulated in conditions that replicate the work environment, including:

- *noise levels*
- *production flow*
- *interruptions and time variances*
- *access to special purpose tools, equipment and materials (i.e. product to be loaded onto the machine, the printing and print finishing machine being loaded, quality inspection tools and equipment)*

Additional instructions (on page 13 of the Trainer/Assessor Assessment Guide) state:

Use the Demonstration/Observation Checklist provided in the Assessor Evidence Pack to record your observations of the Participant's performance. You must enter the date you observed the task being performed ...

and

Evidence analysis

Please provide brief descriptions of what the Participant was doing when you observed the skill or knowledge being applied.

The completed 'Demonstration/Observation Checklist' provided for the sampled learner NS contained a handwritten statement under the heading 'Describe adjustments made and rationale' that, *'Due to Corona Virus the trainer could not directly oversee the demonstration. Trainer was aided by the apprentice's supervisor'*. A similar handwritten statement was found in the completed 'Demonstration/Observation Checklist' provided for sampled learner MJ (assessed by the same assessor as for learner NS), where it was stated, *'Due to Corona Virus the trainer could not be onsite for the demo. Trainer was aided by the apprentice's supervisor'*.

When interviewed the assessor advised that, with respect to learner NS, he had not personally observed the learner's performance in the workplace as part of the assessment process for unit *ICPSUP216 Inspect quality against required standards* (as he was unable to visit the workplace due to COVID-19 restrictions). The assessor further advised that as NS' workplace prohibited recording of the learner working at the facility, observation of NS' performance was instead undertaken by the workplace manager, rather than the assessor. The assessor advised that he had also requested that workplace manager ask the learner the oral questions. The assessor confirmed that he completed the 'Demonstration/Observation Checklist' and 'Oral Questions Checklist' after having spoken with the observer (workplace manager) by phone and that the workplace manager sent the assessor 'something in writing'.

The approach to conducting the 'Demonstration/Observation' assessment described by the assessor is not consistent with the instructions included in the 'Trainer/Assessor Assessment Guide' document (AG_ICPSUP202_ICPSUP216_v3.pdf – Version 3, June 2019). Furthermore, it is inconsistent with information provided by the RTO's CEO during audit discussions that at the onset of COVID-19 assessors were informed of the RTO's 'expectations' with respect to demonstration/observation assessments when an assessor could not visit and observe a learner onsite in the workplace - that is, the assessor could conduct the observation via video (live or recorded) - or if the assessor could not observe directly or obtain a recording then they would need to wait until they could undertake the observation to complete the assessment.

As the assessor has not undertaken the 'Demonstration/Observation' assessment in accordance with the instructions specified in the 'Trainer/Assessor Assessment Guide' - nor in accordance with the conditions and alternative approach to conducting observations as outlined by the RTO's CEO where direct access to learners is prevented - it could not be confirmed that the RTO has ensured reliability in the implementation of its assessment system and the conduct of assessment.

ICP31315 Certificate III in Print Manufacturing

ICPKNW322 Develop knowledge of the printing and graphic arts industry

The evidence provided does not fully support that the RTO has implemented an assessment system that ensures assessment complies with the Rules of Evidence – validity and sufficiency, and the Principle of Assessment - reliability. Specifically:

- A review of completed learner assessment documents for sampled learners AP and AM for the above unit of competency (clustered with unit *ICPSUP281*) in conjunction with the assessment tools provided for the unit found insufficient evidence to confirm that the following performance evidence requirements had been fully addressed through the assessment process for unit *ICPKNW322*:
 - *Evidence of the ability to:*
 - *use appropriate vocabulary and terminology in written and oral communications with tradespeople, colleagues, management or clients*
 - *apply relevant legislative and workplace requirements when completing tasks*
 - *accurately plan, cost and document a print job.*

During discussions regarding the above identified deficiencies with the RTO's assessment system, tools and practices for the unit, the RTO's Instructional Design Team Leader advised that, with

Evidence analysis

reference to performance evidence requirement in relation to 'oral communication', that this may have been assessed as part of assessment undertaken for units *ICPSUP260* or *ICPSUP262*.

The RTO subsequently provided a document (Appendix D ICPKNW322 performance evidence.pdf) mapping the above performance evidence requirements to the 'written questions' and 'project' tasks included in the assessment tools provided for unit *ICPKNW322* (clustered with *ICPSUP281*), in addition to mapping of the performance evidence requirements to various assessment tasks for other units of competency that the provider advised as being 'delivered prior to the ICPKNW322 and ICPSUP281 cluster' - including units *ICPSUP260*, *ICPSUP262*, *BSBSUS201*, *ICPSUP203*, *ICPSUP323*, *ICPSUP202*, *ICPSUP216*. However, as no assessment tools were provided for most of the other units of competency (except units *ICPSUP202* and *ICPSUP216*) it could not be confirmed that collectively the identified assessment tasks gather *valid* evidence of performance that fully aligns with the above performance evidence requirements for unit *ICPKNW322*.

Whilst it is noted that the 'Final Assessment Outcome Record' documents provided for sampled learners AP and AM for unit *ICPKNW322* indicated that they had 'successfully completed all assessments' with a 'satisfactory' assessment outcome recorded for units *ICPSUP260*, *ICPSUP262*, *ICPSUP216* and *BSBSUS201*, in the absence of any additional assessment evidence and/or assessment tools, it could not be confirmed that *sufficient* performance evidence had been collected through the RTO's assessment process prior to a 'competent' result having been recorded for unit *ICPKNW322* for each of the sampled learners AP and AM.

- During review of completed learner assessment documents for sampled learners AP and AM for unit of competency *ICPKNW322*, it was noted that part of the assessment documentation was incomplete. Specifically, 'Task 1: Job production' of the 'Project' task (in the Participant Evidence Pack document) includes a statement '*Supporting documents attached*' Y (checkbox) N (checkbox) (please tick)'. For both learners, neither of the checkboxes had been marked to indicate whether or not supporting documents were attached. As it was not evident from the assessment documents provided that these incomplete statements had been reviewed by the learner's assessor, it could not be confirmed that assessment had been conducted in accordance with the processes outlined in the RTO's assessment system for the unit, consistent with the Principle of Assessment – reliability. This matter was raised with the RTO during the audit; to which the RTO's CEO subsequently advised the following in relation to the deficiency with the assessment documents (with reference to both sampled learners AP and AM):

'The Assessor Guide indicates that the supporting documents are optional. The Trainer and Assessor was reminded on 9 November 2020 via phone call to indicate whether the supporting documents are attached.'

- Letter ASQA Requested Information.pdf, dated 11 November 2020.

MSS402080 Undertake root cause analysis

The evidence provided does not fully support that the RTO has implemented an assessment system that ensures assessment complies with Principle of Assessment – reliability. Specifically:

- During review of completed learner assessment documents provided for sampled learner TNH for unit of competency *MSS402080*, it was noted on page 7 of the 'Participant Evidence Pack' (as indicated by ticks) that a photo, data source and workplace report were attached as project evidence. However, not all of the project evidence documents were attached to the learner assessment documents provided by the RTO. This matter was raised with the RTO during the audit; to which the RTO's CEO subsequently advised the following:

'The workplace report is included in the evidence provided however there is no evidence of data source and photo.'

- Letter ASQA Requested Information.pdf, dated 11 November 2020.

The instructions on page 7 of the 'Participant Evidence Pack' state, '*Ensure you have attached your project evidence to this Participant Evidence Pack for submission to your Trainer/Assessor: (checkbox) photo (checkbox) data source (checkbox) workplace report.* As the photo and data

Evidence analysis

source project evidence are missing for sampled learner TNH (assessed as 'competent' on 2 September 2020), it cannot be confirmed that the RTO has ensured *reliability* in the implementation of its assessment system and the conduct of assessment.

During the audit, two of the RTO's assessors for the above qualification were interviewed. Both assessors advised during discussions that they have been relying on reports from learners' workplace supervisors as a basis for completing demonstration/observation checklists, when the assessors have been unable to visit and observe some learners in their workplace during the COVID-19 pandemic. One of the assessors also assesses learners for the qualification *ICP31215 Certificate III in Printing*, and a specific instance of this practice/behaviour has been described previously in this report in relation to a learner enrolled in that qualification. The practice described by the two assessors is inconsistent with the assessment processes outlined in the RTO's assessment system documents as sampled during the audit, and may potentially compromise the integrity of the RTO's assessment system with respect to the gathering of sufficient and authentic evidence of a student's performance.

TLI31616 Certificate III in Warehousing Operations

TLIF1001 - Follow work health and safety procedures

TLIL1001 - Complete workplace orientation/induction procedures

Completed learner assessments and interviews with the assessor and Instructional Design Team Leader did not confirm the RTO's assessment practice meets the Principles of Assessment and Rules of Evidence requirements. For example:

- Written question 6 ask learners – Why are good housekeeping procedures important? The benchmark answer to guide the assessor is:
Participant must understand that good housekeeping procedures help to maintain a safe work environment free from slips, trips and other hazards posed by obstacles and waste. They may refer to specific housekeeping policy and procedures and they may also make reference to customer perceptions and organisation reputation.

The learner responses to question 6 are:

- For learners SA, PS and US - 'to maintain safe work place'
- For learner DR - 'to avoid accidents or injuries and prevent hazards'

When asked about how the benchmarking was used in relation to assessing question 6, the assessor stated:

We have an assessors guide that I follow, if the answer isn't in-line with the assessors guide we mark it and then update the assessors guide.

I would like the student to write a fair-bit but some students have English as second language and so I ask them verbally, pull them aside, ask them to go away and think about it and then they give me a verbal answer and I write that answer. P (learner PS) spent a lot of time giving verbal questions that I write in.

The completed assessments for learners SA, PS and US have a black stamp saying, 'THE FOLLOWING PARTICIPANT WAS IDENTIFIED AS HAVING LITERACY ISSUES. VERBAL OVER WRITTEN'. Comparing the handwriting of each document showed each handwriting to be unique between learners and unique compared to the handwriting of the assessor. As recorded above, the answer provided for question 6 was the same for learners SA, PS and US. This is inconsistent with the assessor's description of the assessment practice. As learner responses are identical after the assessor's verbal questioning the assessment has not met the Principles of Assessment - reliability and Rules of Evidence – sufficiency and authenticity.

- For written question 2, 'What disciplinary procedures might your employer take if you don't comply with the employment conditions stated in your contract?' learner US' response is 'working'. The assessor as written 'discussed' in the learner response section, however has not recorded the discussion/verbal questions asked and the learner response. When asked about how reassessment was conducted, the assessor stated:
I complete retraining, could be something simple they missed and they get an opportunity to write another answer.

Evidence analysis

As for question 6, the evidence for question 2 does not demonstrate the assessment / reassessment practice meets the requirements of the Principles of Assessment - reliability and Rules of Evidence – sufficiency as the evidence relied on for the assessment judgement has not been recorded.

- For the completed assessments for learners SA, PS, US and DR the assessor has stamped in red 'TRAINEE COMPETENT USING WRITTEN & VERBAL TOOLS AS PER MARKING GUIDE SPECTRA DANIEL GREGORY SENIOR TRAINER' in the following sections:
 - Assessor feedback on assessment
 - Supporting comments from the supervisor – (on the third party report section).Note, the stamp, for learner PS, the stamp was used 49 times over 27 pages and for learner US, 50 times over 27 pages.

During the audit, the Instructional Design Team Leader was asked about the use of the red stamp. She said *it was not acceptable and not to be used*. When presented with the sampled completed learner assessment with the red stamp and asked why it was currently in use, she described the RTO's quality assurance process for ensuring compliant assessment practice as:

The admin staff get the assessment tool in and double check everything matches and QAs it- that it is signed etc, then they, was to tell the Training Manager if the stamp was being used.

Assessors need to fill out (the assessment tool) with comments until we get a new template for observations – the new template we have and the new AE (assessor evidence document) that has clearer instructions to assessors, and the new heading is 'details of observation to support decisions (how did the participant demonstrate competency or not)'. All trainers now have this new AE and use it and were trained in using this form in the PD session. The new AE has not been rolled out for the TLI but assessors were trained to complete the current AEs with the new level of detail.*

**Refer to Clause 1.13 of this report about the RTO's in-house professional development session where assessors were told not to use the stamp – this session occurred prior to the abovementioned learner's assessment.*

When asked if she had any comments about the current assessment tools benchmarking for trainers/assessors and instructions to learners for the TLI training products, the Instructional Design Team Leader said:

I want to update so much. Frustrated as I don't have the hours to update it.

A lot of stuff is good and the learner content is good, but it is just not robust, if the student is to give 2 examples have instructions like 'student must include this answer'

Really bothers me the 'answer as per the workplace/policy procedure' – my view is they should collect the policy and procedure.

When asked about the depth and breadth guidance for questions, for example (abovementioned) written question 6, the Instructional Design Team Leader said:

I would get rid of that question, as it is too vague – no 'why is it important'.

These type of questions don't add value, not robust, best addressed in other types of questions.

During the final audit, the Senior Manager Finance and Compliance agreed with the non-compliances identified. When asked specifically about the assessors continued use of the red stamp after the RTO's specific directions at the PD session not to use the stamp and the RTO's next steps to correct assessor behaviour, she stated:

We will talk to trainers individually about why this is not occurring, observe the practice trainers are undertaking and show them the way they should be. We plan to implement regular internal audits – if we conduct PD the regular internal audit will be conducted to ensure this is happening.

It is not evident the RTO's assessment is conducted to meet the requirements of the Principles of Assessment – reliability and fairness - as the assessment tools do not provide sufficient

Evidence analysis

instructions to learners about the assessment requirements and instructions to assessors about the RTO's assessment practice expectations and Rules of Evidence – validity and sufficiency – as in lieu of recording the assessment judgement evidence the assessor used the generic red stamp.

Audit finding

Not compliant

- The RTO has not demonstrated learners have been assessed against all units of competency requirements and that its assessment tools and practices are consistently implemented so as to ensure the Principles of Assessment and Rules of Evidence have been met.

Action required

Provide evidence that demonstrates:

- the RTO has corrected its assessment system (to comply with Clause 1.8) for future learners and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
 - include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant to demonstrate the provider will implement an assessment system that ensures assessment:
 - complies with the assessment requirements of the relevant training product(s)
 - will be conducted in accordance with the Principles of Assessment and Rules of evidence.
- the RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to learners enrolled in the training product sampled that were assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action needs to cover current learners and learners who were assessed by the RTO in the past one month.

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

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.

Key sources of evidence relevant to finding

- Daniel Gregory Professional Development Matrix 2020 v5
- Minutes and attendance-PD Effective observation checks_08052020 - RTO held VET PD 4-8 May 2020
- Minutes -PD Effective observation checks_08052020 – RTO held VET PD 4-8 May 2020
- Spectra PD session attendance sheet_08052020 – RTO held VET PD 'Effective completion of observation checklists' 8/5/2020
- TLI31616 *Certificate III in Warehousing Operations* completed learner assessments for:
 - learner SA, DR, PS, US

Key sources of evidence relevant to finding

Interviews:

- Jenny Rushton, CEO
- Camilla Zhong, Senior Manager Finance and Compliance
- Renee Martensen, Instructional Design Team Leader
- Daniel Gregory, Trainer/Assessor TLI31616

Evidence analysis

On ASQA's website the *Guide to developing assessment tools* (published 2015 and currently available), section 5. Administration, recording and reporting requirements states:

Where possible retain the actual piece(s) of work completed by the learner. The completed evidence criteria may be sufficient where it is not possible to retain the student's actual work. However, you must ensure that the retained evidence has enough detail to demonstrate the judgement made of the learner's performance against the standard required.

Each assessment tool should require an assessor to provide feedback to the learner, both where competency has been demonstrated and where further evidence is required. Providing feedback shows fairness in the assessment process and allows a learner to understand why a result was awarded.

Every RTO has its own internal processes and procedures to manage administration, recording and reporting requirements. Your assessment tools must be designed to comply with these processes.

On ASQA's website, refer to the video *Assessment: what are observable behaviours?* This video provides guidance about assessors' providing learner assessment feedback - notations of when, where and what practical assessment behaviours were demonstrated by the learner and observed by the assessors. This video also provides guidance on how assessors can give feedback comments to learners by aligning comments to assessment benchmarks; the fairness Principle of Assessment requires that the RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary. Making it clear what learner performance gaps exist are the basis of how a learner can challenge the result of the assessment and the basis for a reassessment.

The ASQA guidance of contemporary VET practice is relevant to determining if trainers/assessors have current knowledge and skills in vocational training and learning that informs their training and assessment.

A review of assessments conducted by, and an interview with trainer/assessor Daniel Gregory did not confirm the trainer/assessor meets the requirements of Clause 1.13 (c). Although the RTO has provided evidence Mr Gregory has undertaken professional development, a review of Mr Gregory's practice does not confirm that training and assessment is only conducted by persons who have current knowledge and skills in vocational training and learning that informs their training and assessment as is required by the Standards for RTOs 2015.

On 8 May 2020 Mr Gregory attended the RTO's 'Effective completion of observation checklists' professional development session. On 12 May 2020 Mr Gregory conducted the final observation assessment for student DR for units *TLIL1001* and *TLIF1001* for *TLI31616 Certificate III in Warehousing Operations* where Mr Gregory used a red stamp that says 'TRAINEE COMPETENT USING WRITTEN & VERBAL TOOLS AS PER MARKING GUIDE SPECTRA DANIEL GREGORY SENIOR TRAINER' in each of the following assessment tool section response boxes (with the following titles and instructions):

- *Assessor feedback on the assessment*
- *Supporting comments from the Supervisor Indicate if the Participant is completing each task in the workplace appropriately and provide any comments/example of their performance.*

When asked about the use of the red stamp, Mr Gregory stated:

Evidence analysis

...the last... ASQA audit the auditor asked why you don't write a comment, like 'good work'? Trainees don't like different responses like, one could be, good, one great, one need more work, so I just say competent or not yet competent.

The last ASQA auditor liked the stamp during the last audit.

When asked about if he recording authentic behaviour (in the assessment tool) observed, Mr Gregory stated:

No as I don't want to single someone out because that could embarrass them in front of their peers. I will let the manager know they did something good.

When asked, the RTO's CEO, Senior Manager Finance and Compliance and Instructional Design Team Leader advised the professional development session was delivered to change the assessment practices of its assessors in response to external and internal audit findings. When asked specifically about the use of the red stamp, the Senior Manager Finance and Compliance and Instructional Design Team Leader each confirmed that this was not acceptable practice and were concerned its use by an assessor had continued.

Although the RTO provided Mr Gregory with the knowledge and expectation of what constitutes its current assessment practice and ASQA's website provides guidance about current practice, it is not evident this has informed Mr Gregory's training and assessment.

Audit finding

Not complaint

- It is not evident that the RTO's training and assessment is only delivered by persons who have current knowledge and skills in vocational training and learning that informs their training and assessment.

Action required

Provide evidence that demonstrates:

- The RTO now has sufficient systems/controls/processes that ensure the RTO's training and assessment is delivered only by persons who have current knowledge and skills in vocational training and learning that informs their training and assessment.

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 RTO's training and assessment strategy document provided for *TLI31616 Certificate III Warehousing Operations* was found to incorrectly state 'access to a vehicle (bus) in section 2.6 'Location and Nature of Facilities'. ASQA received a corrected version of the document on 6 November 2020.
- The RTO's training and assessment strategy documents provided for the qualifications *ICP31215 Certificate III in Printing* and *ICP31315 Certificate III in Print Manufacturing* were found to incorrectly identify imported elective units of competency *MSS402040* and *MSS402080* as Group C elective units from the training package.
- The title on the cover page of the Learning Support Pack used by the RTO in the delivery of clustered units *ICPSUP216* and *ICPSUP202* is 'Product Handling and Quality Inspection'. The two units of competency to which the content relates – *ICPSUP216* and *ICPSUP202* – are correctly identified by unit code and title on page 2. However, in the footer of the document it is stated '*ICPSUP216 + ICPSUP202 Product Handling and Quality Inspection*'. The combining of

the unit codes with the title of the Learning Support Pack in this way, gives the incorrect impression that the title of unit *ICPSUP202* is 'Product Handling and Quality Inspection', which is not consistent with the actual title of the unit in the ICP training package.

- The title on the cover page of the Learning Support Pack, Volume 1 for unit *ICPKNW322* is 'Apply knowledge'. The unit of competency to which the content relates has been correctly identified by unit code and title on page 2. However, in the footer of the document it is stated 'ICPKNW322 – Apply Knowledge – VOLUME 1'. The combining of the unit code with the title of the Learning Support Pack in this way, gives the incorrect impression that the title of unit *ICPKNW322* is 'Apply knowledge', which is not consistent with the actual title of the unit in the ICP training package.
- The title on the cover page of the Learning Support Pack, Volume 2 for unit *ICPKNW322* is 'Apply knowledge'. The unit of competency to which the content relates has been correctly identified by unit code and title on page 2. However, in the footer of the document it is stated 'ICPKNW322 – Apply Knowledge – VOLUME 2'. The combining of the unit code with the title of the Learning Support Pack in this way, gives the incorrect impression that the title of unit *ICPKNW322* is 'Apply knowledge', which is not consistent with the actual title of the unit in the ICP training package.
- The title on the cover page of the Learning Support Pack, for unit *MSS402080* is 'Problem Solving'. The unit of competency to which the content relates has been correctly identified by unit code and title on page 2. However, in the footer of the document it is stated 'MSS402080 – Problem Solving'. The combining of the unit code with the title of the Learning Support Pack in this way, gives the incorrect impression that the title of unit *MSS402080* is 'Problem Solving', which is not consistent with the actual title of the unit in the training package.
- An apparent typo was identified on page 19 in the document Trainer/Assessor Assessment Guide 3B AG_ICPSUP202_ICPSUP216_v3.pdf - Version 3, June 2019. Specifically, the left hand column in the table states '4' when it should state '5' ('4' is on the previous page, and '6' is on the next page).