



# REPORT

## Audit report: Training Practical Solutions Consultancy Pty Ltd

RTO number:	41290
CRICOS number:	N/A
Date/s of audit:	11-12 May 2020
Date report created:	13 May 2020
Date report updated:	20 July 2020

## Organisation details

Organisation's legal name:	Training Practical Solutions Consultancy Pty Ltd
Trading name/s:	N/A
RTO number:	41290
CRICOS number:	N/A

## Audit team

Lead auditor:	Ian Penna
Auditor/s:	Emma Stokes

## Audit details

Audit number/s:	AUDREC0010546
Audit reason/s:	Compliance Monitoring
Address:	N/A (desk audit)
Date/s of audit:	11-12 May 2020
Organisation's contact for audit:	Lee Tudor Managing Director lee@tpsconsultancy.com.au 0447626406

## Original finding at time of audit

### Audit finding: Serious non-compliance

Report completed by: Ian Penna

Practice	Standards for RTOs	Finding
Training and Assessment	1.1*, 1.2*, 1.3, 1.6, 1.8*, 1.9*, 1.10*, 1.11, 1.13, 1.14, 1.16	Not compliant
Enrolment	5.1*, 5.2	Not compliant
Support and Progression	1.7*	Not compliant

\*Indicates a non-compliant clause

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 25/06/2020: Serious non-compliance

Report completed by: Ian Penna

Practice	Standards for RTOs	Finding
Training and Assessment	1.1, 1.2, 1.8*, 1.9*, 1.10*	Not compliant
Enrolment	5.1	Compliant
Support and Progression	1.7	Compliant

\*Indicates a non-compliant clause

## Background

Summary of organisation and management structure:

- Training Practical Solutions Consultancy Pty Ltd (the organisation) was formed in 2014, and was registered as an RTO in September 2015. Mr Lee Tudor is the Managing Director and part-owns the organisation in conjunction with Mr Rohan Appleton and Mr Rob Legg as shareholders. The Managing Director is assisted in the management of the RTO by Ms Jamie Yeo who is the Quality Assurance & Compliance Manager, and Mr Daniel Beattie who is the Business Development Manager. At the time of audit, the organisation had four contract trainers and assessors.

Scope of organisation's registration:

- *FBP10117 Certificate I in Food Processing*
- *FBP30117 Certificate III in Food Processing*
- *MSS20316 Certificate II in Competitive Systems and Practices*
- *MSS30316 Certificate III in Competitive Systems and Practices*
- *MSS40316 Certificate IV in Competitive Systems and Practices.*

Suburb and state of all delivery sites:

- 4/55 Willandra Drive, EPPING VIC 3076
- 2-4 Cyber Loop DANDENONG SOUTH VIC 3175
- delivery is conducted on employer worksites.

Third party usage:

- the organisation does not engage any third parties to conduct marketing, recruitment or to deliver training/assessment for any of training products on scope.

Core clients/target groups:

- are existing skilled workers with current employment at workplaces, suitable to supervise training/assessment.

Training Revenue (Funded or fee for service):

- the organisation's principal revenue source is through the provision of State Government funded courses.

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

- 81 as at 12 May 2020.

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

- Information provided by students as part of a student survey or interview.
- Information provided directly by Training Practical Solutions Consultancy Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Training Practical Solutions Consultancy Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the desk audit of Training Practical Solutions Consultancy Pty Ltd conducted on 11 & 12 May 2020.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>MSS40316 Certificate IV in Competitive Systems and Practices</i>	Face to face / workplace	39
<i>FBP30117 Certificate III in Food Processing</i>	Face to face / workplace	5

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

## Interviewees

Name	Position	Training products
Lee Tudor	Managing Director	All
Jaime Yeo	Compliance Manager	All
Daniel Beattie	Business Development Manager	All

## 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 students.

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 students and carrying out remedial action for current and past students.

## Original action required by Organisation

Training Practical Solutions Consultancy Pty Ltd did not meet all requirements for:

Standards for RTOs (2015) Clauses: 1.1, 1.2, 1.7 - 1.10, 5.1.

Remedial action is required for the following training products:

- *MSS40316 Certificate IV in Competitive Systems and Practices*
  - *MSS403001 - Review competitive systems and practices*
  - *MSMENV472 - Implement and monitor environmentally sustainable work practices*
- *FBP30117 Certificate III in Food Processing*
  - *FBPFSY2001 - Implement the food safety program and procedures*

The organisation is required to provide evidence that demonstrates:

### Training and Assessment

- the organisation 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 that complies with Standards for RTOs Clauses 1.1 and 1.2.
- the organisation has corrected its assessment system (to comply with Standards for RTOs Clause 1.8) for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
  - demonstrate the organisation 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 Rules of Evidence.
- the RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students that were impacted by training and assessment practices that did not meet the requirements of the training product (including amount of training). Remedial action needs to cover all students who enrolled, or completed with your organisation, since 1 December 2019, who were assessed in a manner that did not meet the requirements of Standards for RTOs Clauses 1.1, 1.2 and 1.8.
- the organisation has a plan for ongoing systematic validation of assessment practices and judgements which meets all required components of Standards for RTOs Clauses 1.9 and 1.10.

### Enrolment

- the organisation now has appropriate systems that are followed to ensure new students are provided with accurate information to enable them to make an informed decision about undertaking training with your organisation that complies with Standards for RTOs Clause 5.1.

### Support and Progression

- the organisation now has appropriate systems that are followed to ensure the support needs of individual students are determined that complies with Standards for RTOs Clause 1.7.

## **Audit finding following analysis of additional evidence**

**Following analysis of additional evidence provided by Training Practical Solutions Consultancy Pty Ltd on 25/06/2020, the organisation:**

- provided sufficient evidence to demonstrate compliance with:  
Standards for RTOs: Clauses 1.1, 1.2, 1.7 and 5.1.
- remains not compliant with:  
Standards for RTOs: Clauses 1.8, 1.9 and 1.10.

Refer to analysis of additional evidence detailed under each clause in this report for further information.

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

##### Standards for RTOs Clause 1.2

*Original 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.

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following evidence was reviewed:
  - training and assessment strategies for above courses – generic versions and customized for example:
    - MSS40316 TAS V5.0 2020
    - FBP30117 TAS V1.0 2020
    - TAS BRW MSS40316 – customized for employer/client (i.e. Bendigo Rail).
  - BRW VOL PUSH Calculations
  - training schedules - BRW Project Teams
  - training plans – FBP30117, MSS40316.

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. For example: Certificate IV: 0.5 – 2 years (600 – 2400 hours). The organisation has not demonstrated how their training and assessment strategies (TAS), which are a significant variation from the recommended volume of learning hours, is appropriate and will achieve the required rigour and depth of training. The organisation's generic *MSS40316 Certificate IV in Competitive Systems and Practices* course TAS includes a reference to the nominal hours adding up to 580 hours, for the selection of elective units included in their course. This does not include the times required by the student to undertake unsupervised training. By contrast, the organisation's TAS states they can deliver this course in just 177 hours total volume of learning.

- The organisation has not provided a rationale as to how it determined the volume of learning to deliver its courses (sampled) where there is a significant reduction to the notional AQF duration of hours. Similarly, no rationale was provided to explain why delivery of their *MSS40316 Certificate IV in Competitive Systems and Practices* course for students from Bendigo Rail includes 33% more scheduled time to complete, over and above the organisation's generic TAS.
- The organisation has not demonstrated that it has training and assessment strategies and practices, including an amount of training that are consistent with the requirements of the training package and enable the student to meet the requirements for each unit of competency in which they are enrolled.

The following was reviewed in relation to training and assessment:

The organisation's generic TAS for *MSS40316 Certificate IV in Competitive Systems and Practices* will be delivered as follows:

- 16 hours classroom (8 days for 2 hours per day face-to-face; first 2 hour session is orientation)
- 3.5 hours assessment administration (e.g. checking all assessment completed and reassessment if required)
- 67 hours self-paced learning
- 90.5 hours on the job supervised training
- **177 hours total volume of learning**
- 1 year duration.

The organisation's customised Bendigo Rail TAS for *MSS40316 Certificate IV in Competitive Systems and Practices* is delivered as follows:

- 16 hours classroom (8 days for 2 hours per day face-to-face; first 2 hour session is orientation)
- 30.5 hours self-paced learning
- 190 hours on the job supervised training
- **236.5 hours total volume of learning**
- 1 year duration.

- The organisation's documented training and assessment strategies contain conflicting and/or unclear information regarding the volume of learning provided to the target student cohort, and do not separate training from assessment; therefore, the actual amount of training cannot be confirmed.

In the TAS, the organisation indicates that it schedules training face-to-face for all of the 'on-the-job' training sessions, including coaching and support sessions. The review of student files submitted indicated that students had been released for between one to one and a half hours per week (i.e. approximately 50 to 75 hours on average for the full year) to attend scheduled training (refer to Structured Training Withdrawal Log). On this basis, it is not clear how the organisation will/is delivering 190 hours of 'on-the-job' supervised training, as specified in the TAS BRW MSS40316.

The organisation's TAS includes a breakdown of the delivery components forming the volume of learning which advises:

'Self-study, practice in the workplace and completion of formative activities or assessment tasks: This time allows for completion of scenario questions or practicing tasks (projects) expected to be assessed in the observation assessments within the learner's workplace or work area. This time should be allocated during the learner's roster or working hours. Selected assessments have been approved by the organisation's senior management to form part of the learner's workplace activities.'

The organisation provided no evidence of how in-practice each student has completed this component of the course, nor what resources are to be provided for each student to undertake the expected self-paced learning, and relevant formative assessment tasks.



- The strategy for delivering courses entirely in the workplace does not adequately detail the respective roles and responsibilities of both organisations (RTO and workplace). With regards to the strategy for delivering the MSS40316 course at Bendigo Rail, the 'on-the-job' component makes up 80% of the course delivery. A clear strategy for delivery in the workplace does not exist in the strategy submitted for review. The strategy for training in the workplace does not specify how the RTO, the workplace and the student will collectively determine a work schedule with an appropriate range of tasks and responsibilities to support the formal training that is required to be delivered by the RTO, and completed by the student in their workplace prior to final assessment.

Only limited evidence was provided to demonstrate how the organisation's current practices support the stated relationship (albeit with limited detail) with Bendigo Rail, for example but not limited to:

- TAS BRW MSS40316 the organisation states (p. 30) 'All on-the-job training is conducted face to face. At each on-the-job training session, the trainer/assessor will review the student's progress and update their supervisor monthly.' and
  - 'Selected assessments have been approved by the organisation's senior management to form part of the student's workplace activities.'
  - Phase 2 of the strategy (refer above for details).
- The organisation provided no evidence to demonstrate that it has been delivering Phase 2 of their TAS, which involves 'completion of day-to-day practical work tasks under the guidance and supervision of a nominated workplace supervisor and/or trainer and assessor.' The organisation has provided no details as to how it will ensure that Phase 2 is completed and a record created to document the specific tasks performed by each student.
  - The list of resources identified in the TAS (e.g. 'Delivery and Assessment Equipment and Resources') includes no clear reference to materials that would facilitate students completing the self-study component of the course. The learning materials provided for review were minimal (e.g. MSM403001 – 12 basic power point slides).
  - In the TAS (p. 14) the assessment strategy requires students to complete any two of the five summative assessment tasks. It was not demonstrated how the student can be sufficiently assessed for all of the training product requirements where only two forms of summative assessment are satisfactorily completed.

#### *Analysis of additional evidence*

*MSS40316 Certificate IV in Competitive Systems and Practices*  
*FBP30117 Certificate III in Food Processing*

- The following additional evidence was reviewed:
  - ASQA audit response report
  - Training and assessment strategies for:
    - *MSS40316 Certificate IV in Competitive Systems and Practices*
    - *FBP30117 Certificate III in Food Processing.*
  - Attendance Training Record (template) ATR V10.0 (2020).xlsx
  - Overall Progress Report (template) OPR 2020 -New Format.xlsx
  - Learner assessment tool - AT ENV V3.1 June 2020.pdf.
- The organisation has addressed the non-compliance for future students.

## Standards for RTOs Clause 1.8

**Original Finding: Not compliant**

**Finding following additional evidence: 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.

### Table 1.8.1 Principles of Assessment

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

### Table 1.8.2 Rules of Evidence

Validity	<p>The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.</p>
Sufficiency	<p>The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.</p>
Authenticity	<p>The assessor is assured that the evidence presented for assessment is the learner's own work.</p>
Currency	<p>The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.</p>

MSS40316 Certificate IV in Competitive Systems and Practices

FBP30117 Certificate III in Food Processing

- The following evidence was reviewed:
  - Assessment tools including learner guides (clusters 1 and 3), marking guides (clusters 1 and 4) and mapping tools for:
    - *MSS403001 - Review competitive systems and practices*
    - *MSMENV472 - Implement and monitor environmentally sustainable work practices*
    - *FBPOPR2069 - Use numerical applications in the workplace*
  - Completed student assessments for the following students:
    - SN (01104) – FBFPSY2001
    - NA (00973) – MSMENV472
    - VD (01093) - MSMENV472
    - DF (00950) - MSMENV472
    - HL (00946) - MSMENV472
    - TH (01062) – MSS403001
    - JT (01102) – MSS403001
    - KT (01101) – MSS403001
    - JZ (01096) – MSS403001
  - Project A – Written Questions
  - Project B - Task: Research, develop and implement Visual Management Board.

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

- of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8
- that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.
- Principles of Assessment, Reliability. Rules of Evidence, Sufficiency and Authenticity.
- *MSMENV472 - Implement and monitor environmentally sustainable work practices*

This unit of competency covers the skills and knowledge required to effectively analyse the workplace in relation to environmentally sustainable work practices, and to implement improvements and monitor their effectiveness.

This unit of competency applies to those who have responsibility for a specific area of work or who lead a work group or team. It addresses the knowledge, processes and techniques necessary to implement and monitor environmentally sustainable work practices, including the development of processes and tools.

It includes identifying areas for improvement, developing plans to make improvements, and implementing and monitoring improvements in environmental performance.

- Reliability and Sufficiency - the assessment tools do not address all unit of competency requirements. For example, but not limited to:

The assessment system does not capture sufficient evidence of the Knowledge Evidence requirements, as the review found instances where student completed assessments were not assessed in accordance with the associated marking guide. Specifically, incorrect and insufficient responses to knowledge questions were accepted as satisfactory without evidence of reassessment or further verbal confirmation recorded by the assessor. For example but not limited to:

- Project A: written questions (15)
  - Question 1 asks the student to identify two environmental regulations and licensing conditions. Of the four student files reviewed, only two students provided two regulations and licensing conditions.
- Part C – observation (in workplace)

The assessment system is not reliable or sufficient for capturing evidence of the student applying the required knowledge in the demonstration of the required skills. The assessment recording tool consists of a checklist with eight separate items that the assessor needs to use to record their observations. The organisation's system of capturing and recording evidence of what the assessor observed is not reliable. For example but not limited to:

Item 6 on the checklist requires the assessor to observe the following:

'Communicate with team members and supervisors in relations to setting up targets for improvements

- Consult all relevant and appropriate team members regarding possible changes
- Seek information and data
- Evaluate alternative solutions to workplace environmental issues
- Seek suggestions and ideas about environmental and resource efficiency
- Discuss and set efficiency targets collectively'

The assessor's comments recorded for two of the four students reviewed stated: "... has no issue with communication with team members." and "... always seeks relevant information and data". The assessment system does not record sufficiently detailed evidence of the context and required skill(s) demonstrated by the student.

- Authenticity - the assessment system does not confirm authenticity of assessments submitted. For example, but not limited to:

- Project A: written questions (15)

Question 15 – two students provided the same poor grammar in their response as follows:

'It improved employees relationship and bring them together with management'.

There were many other instances of students providing identical responses. There is no attestation of authenticity by students in completed assessments, to declare the responses are their own work, and not in breach the organisation's authenticity and plagiarism requirements.

- *MSS403001 - Review competitive systems and practices*

This unit of competency covers the skills and knowledge required by an individual to review competitive systems and practices in their own work in a way that integrates with others in the team or work area who are also implementing competitive systems and practices. The unit focuses on the holistic application of competitive systems and practices to achieve improved performance in own work and in activities with others in the team or work area that contribute to improving customer benefit.

Individuals must demonstrate the ability to integrate the application of their technical skills with the implementation of competitive systems and practices in an organisation.

The unit applies to the areas of cost, quality, delivery, safety/environment, and employee capability, including continuous reviewing of performance against these five areas in liaison with other relevant people. This unit emphasises the ability to advance on all five key areas over a moderate time period.

This unit requires the application of skills associated with problem solving and initiative and enterprise in order to identify opportunities to make improvements and maximise performance. Communication, the ability to work in a team and planning and organising skills are required to implement improvements and address any conflicts that arise. This unit also requires an ability to identify appropriate technology, and to consider and integrate feedback on how personal performance can be improved.

- Reliability and Sufficiency - the assessment tools do not address all unit of competency requirements. For example, but not limited to:

The assessment system does not capture sufficient evidence of the Knowledge Evidence requirements, as the review found instances where the student's completed assessment was not assessed in accordance with the associated marking guide. Specifically, incorrect and insufficient responses to knowledge questions were accepted as satisfactory without evidence of reassessment or further verbal confirmation recorded by the assessor. For example but not limited to:

- Project A: written questions (12)

Question 6(b) asks the student to identify one formal and one informal technique to encourage suggestions. Of the four student files reviewed, only one student provided one of each type.

Project B: Task: Research, develop and implement Visual Management Board

Students were assessed as satisfactory despite not providing all of the required portfolio evidence, for example:

- o Hold a meeting with the work area stakeholders to inform them of activities planned and the duration/schedule developed for this project
- o Create and implement an implementation plan including plan items, dates and responsible people
- o Complete A3 Summary report of the activity to present back to stakeholders and share with other areas/personnel of the business.

- Part C – observation (in workplace)

The assessment system is not reliable or sufficient for capturing evidence of the student applying the required knowledge in the demonstration of the required skills. The assessment recording tool consists of a checklist with 12 separate items that the assessor needs to use to record their observations. The organisation's system of capturing and recording evidence of what the assessor observed is not reliable. For example but not limited to:

Item 10 on the checklist requires the assessor to observe the following:

'Demonstrate the ability to identify significant issues resulting from the change implementation with team members

- Negotiable issues
- Non-negotiable issues
- Check for unintended consequences'

The comment recorded by one assessor for two of the four students reviewed stated: 'Communicates well with management and team members.' A different assessor recorded the following comment: '... was able to identify significant issues resulting from changes'. The assessment system does not record sufficiently detailed evidence of the context and required skill(s) demonstrated by the student.

- The criteria for a satisfactory student response falls significantly short of the expectations of students undertaking a qualification at AQF level 4, and in no way reflects the expectations of industry for a person holding a *MSS40316 Certificate IV in Competitive Systems and Practices* qualification. The complexity of the assessment system used to assess the required knowledge elements is not sufficiently robust. The review of student assessments suggests that students may be simply paraphrasing information from the Learner materials (e.g. *FBPFSY2001 Learner guide*, and *Learner Assessment Tool Part B*) or similar reference material without necessarily understanding what the knowledge questions purport to assess, or demonstrating that they comprehend how the concepts may be applied in the workplace.

#### *Analysis of additional evidence*

*MSS40316 Certificate IV in Competitive Systems and Practices*  
*FBP30117 Certificate III in Food Processing*

- The following additional evidence was reviewed:
  - ASQA audit response report
  - Training and assessment strategies for:
    - o *MSS40316 Certificate IV in Competitive Systems and Practices*
    - o *FBP30117 Certificate III in Food Processing*

- Attendance Training Record (template) ATR V10.0 (2020).xlsx
- Overall Progress Report (template) OPR 2020 -New Format.xlsx
- Learner assessment tool - AT ENV V3.1 June 2020.pdf
- Mapping tool for MSS403001, MSMENV472 AND MSS403086
- RESOURCE TRACKER V4.0.xlsx
- MSS40316 Pre-Training Review (PTR)
- MSS40316 PTR Trainer Marking Guide
- Assessment tool template (AT).

The following analysis provides guidance on the areas of non-compliance that remain. Examples of non-compliances are provided; however, this is not an exhaustive list.

- The organisation has not addressed the non-compliance for future students. For example, but not limited to:

Authenticity - the assessment system does not confirm the authenticity of assessments submitted.

- the organisation has not addressed the issues found with regards to the failure of its assessment systems to ensure student responses are authentic. The organisation confirmed that its assessment systems accept as satisfactory evidence, student responses that are copied from the trainer's notes. The organisation advised, 'The learners have not breach TPSC's authenticity and plagiarism requirements but TPSC will install clearer emphasis on individual work.' The organisation did not support their claim with evidence, for example, providing a copy of the respective policy and procedure in place at the time of assessment, nor where they have provided clearer emphasis of their assessment conditions.

Reliability and Sufficiency - the assessment tools do not address all unit of competency requirements.

- the organisation did not provide evidence to support their conclusion that the answers provided by students to Part - C item 10 (refer original finding above) could be satisfactory despite being 'generic in nature'.

- The organisation has not planned and carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
  - the organisation was required to demonstrate that it has carried out remedial action to identify and address the impact the non-compliance may have caused to students that were impacted by training and assessment practices that did not meet the requirements of the training product. Remedial action needed to cover all students who enrolled, or completed with the organisation, since 1 December 2019, who were assessed in a manner that did not meet the requirements of Standards for RTOs.

The organisation did not provide evidence of having reviewed past assessment practices from 1 December 2019, to identify and address the impact of poor assessment practices. In response, they advised, 'TPSC will carry out spot checks on learners' files so to identify areas where insufficient observations or support may have been provided but not recorded.' Sufficient evidence was not provided of its plan, which at a minimum should include the number of students the remedial action will be carried out for, action that will be taken, and timeframes associated with the completion of the plan (reference: ASQA fact sheet – Addressing non-compliances following an audit).

The organisation commented on how they have responded to the audit findings. The organisation provided no evidence to support their claims as follows:

- 'TPSC has clarified the issue with the assigned trainer and assessor for these learners.' (p.15)
- 'TPSC has clarified the issue with the assigned trainers and assessors for these learners.' (p.16)
- 'Theo Karamanidis (Nobody Denim) and Danny Jaimangal (JBS Australia) (trainers and assessors) have clarified that the response provided by:' (p.16)
- 'The comments offered by the trainer(s) and assessor(s) despite being generic in nature points out that satisfactorily evidence was achieved.' (p.17)
- 'We believe the 2019 learner cohorts have undertaken and met the expectations of the industry in which they work, and we have confirmed this through the industry consultations and from the ongoing learners' feedback collected at the completion of each assessment.' (p.19).

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**Standards for RTOs Clause 1.9**

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**Original Finding: *Not compliant***

**Finding following additional evidence: *Not 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.

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**Standards for RTOs Clause 1.10**

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**Original Finding: *Not compliant***

**Finding following additional evidence: *Not compliant***

For the purposes of Clause 1.9, each training product is validated at least once every five years, with at least 50% of products validated within the first three years of each five year cycle, taking into account the relative risks of all of the training products on the RTO's scope of registration, including those risks identified by the VET Regulator.

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following evidence was reviewed:
  - validation schedule – Version 1 2019
  - validation policy and procedure
  - validation checklist FBPOPR2069
  - validation assessment tools FBPOPR2069 – Version 1&2
  - validation checklist MSS403001
  - validation assessment tool MSS403010, MSS405084
  - validation assessment tool MSS403001
  - validation assessment marking guide MSS405084, MSS403010
  - validating assessment marking guide (superseded) AT Validation Old cluster.
- The organisation has not demonstrated how it has ensured that each training product on its scope of registration is validated at least once every five years. For example, but not limited to:
  - it was not clear which training products have been validated since the current Standards for RTOs (2015) were introduced to be able to determine if 50% of training products were validated within the first three years of the cycle as required
  - the organisation indicated that it has a plan to validate 80% of their training products by December 2021. The organisation has not demonstrated how it will schedule validation activities to ensure that each training product on its scope of registration will be validated at least once in the next five years.

*Analysis of additional evidence*

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following additional evidence was reviewed:
  - ASQA audit response report
  - RESOURCE TRACKER V4.0.xlsx.

- The organisation has not provided evidence to demonstrate implementation of their validation plan in accord with their validation policy and procedure. The procedure clearly indicates the importance of incorporating a review of completed student assessments per '3.4-Assessment Validation - It includes reviewing a statistically valid sample of the assessments' and again per Method 2 '...validation includes reviewing a statistically valid sample of the assessments. This implies that validation is being conducted after a period of implementation of assessment and that the review is based on actual completed assessments.'
- The organisation has not demonstrated in the additional evidence submitted, that for the purposes of Clause 1.9, each training product has been validated at least once every five years, with at least 50% of products validated within the first three years of each five year cycle, taking into account the relative risks of all of the training products on the RTO's scope of registration, including those risks identified by the VET Regulator.

## Enrolment

### Standards for RTOs Clause 5.1

**Original Finding: Not compliant**

**Finding following additional evidence: 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.**

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following evidence was reviewed:
  - pre-training review template FBP30117
  - pre-training review template MSS40316
  - pre-enrolment learner interview
  - pre-enrolment marking guide FBP30117
  - pre-enrolment marking guide MSS40316
  - enrolment template
  - student administration files containing enrolment documentation:
    - o SN (01104)
    - o NA (00973)
    - o VD (01093)
    - o DF (00950)
    - o HL (00946)
    - o TH (01062)
    - o JT (01102)
    - o KT (01101).
- The organisation has not demonstrated that it has a consistently used system, designed to capture information regarding the existing skills and/or competencies of prospective students, sufficient to give appropriate advice. For example, but not limited to:
  - inconsistent recording of students training history/skill level was found in pre-enrolment documentation sampled
  - LNN assessments not generating reliable results as instances were found of questions being marked incorrectly. Refer to findings under clause 1.7 for details
  - inconsistent recording of LNN needs were found in student administration files for enrolment.

### *Analysis of additional evidence*

*MSS40316 Certificate IV in Competitive Systems and Practices*

- *FBP30117 Certificate III in Food Processing*The following additional evidence was reviewed:



- ASQA audit response report
  - pre-training review marking guide
  - pre-training review template
  - training and assessment strategy for MSS40316 Certificate IV in Competitive Systems and Practices
  - student 01062 – training plan.
- The organisation has addressed the non-compliance for future students.

## Support and Progression

### Support

#### Standards for RTOs Clause 1.7

*Original Finding: **Not compliant***

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

**The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.**

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following evidence was reviewed:
  - pre-training review template FBP30117
  - pre-training review template MSS40316
  - pre-enrolment learner interview
  - pre-enrolment marking guide FBP30117
  - pre-enrolment marking guide MSS40316
  - enrolment template
  - enrolment documentation for the following eight students:
    - SN (01104)
    - NA (00973)
    - VD (01093)
    - DF (00950)
    - HL (00946)
    - TH (01062)
    - JT (01102)
    - KT (01101)
    - JZ (01096).
  - training plans
  - Thi Nga Huynh TP
  - training and assessment strategies (above two courses).
- The organisation has developed, but not consistently implemented, a method of determining the support needs of individual students necessary for them to meet the requirements of the training product. For example but not limit to:
  - the LNN assessment for student 00973 had not been marked by the assessor
  - student 01104 had two incorrect answers marked as correct on their LLN assessment
  - student 01062 was identified as needing additional support however; the completed student file/training plan did not reflect this. The student's file contained no information regarding the strategies that were implemented to assist this student
  - student 01096 was required to complete the LNN assessment designed for enrolment into a certificate level three course; however, they were enrolling in a certificate level four qualification.

*Analysis of additional evidence*

*MSS40316 Certificate IV in Competitive Systems and Practices*

*FBP30117 Certificate III in Food Processing*

- The following additional evidence was reviewed:
  - ASQA audit response report
  - pre-training review marking guide
  - pre-training review template
  - training and assessment strategy for *MSS40316 Certificate IV in Competitive Systems and Practices*
  - student 01062 – training plan.
  
- The organisation has addressed the non-compliance for future students.