

Audit Date: 05-07/06/2024

RTO: Murray Adult Community Education – Swan Hill Inc.

Applicant Details			
Applicant Name	Murray Adult Community Education – Swan Hill Inc.	TOID	3776
Address	429 Campbell Street Swan Hill VIC 3585		
	Website	http://www.macesh.vic.edu.au	
Registration Contact	Ms Leanne Shannon-Kelson		
Phone Number	0437575115	Email	managaer@macesh.vic.edu.au
Audit Team			
Audit Firm	Bateman and Giles Pty Ltd	Auditor/s	Jennine Cochrane
Auditor/s	N/A	Other Attendees	N/A
Registering Body Details			
Contact Person	Julie Florence		
Phone Number	9059 4537	Email	vet.audit@education.vic.gov.au
Audit Details			
Type of Audit	Re-registration Audit		
Conditions Audited	3, 6, 7, 8, 9		
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, 2.4, 2.5, 2.7	3.1, 3.2, 3.4
2016 VRQA Guidelines Audited	3.1, 3.2, 3.4, 3.5		
	6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.7, 6.8, 6.9, 6.10, 6.11	4.1,4.2.	
Audit Date/s	05-07/06/2024		
RTO Background			
<p>Murray Adult Community Education – Swan Hill Inc., the Registered Training Organisation (also referred to as the RTO or MACE), has been an RTO since 1992. It is governed by a Committee of Management that meets bi-monthly to discuss all matters related to the ongoing operations of the RTO. The Committee of Management also presents ideas for implementation however, it leaves the operations of the RTO to the management of the RTO with little interference.</p> <p>The RTO has experienced challenges during the last three years as a result of COVID-19 and post COVID-19. In particular, it has been difficult to have students return to classes which has contributed to some students not finishing their course. It has also been and remains difficult to employ qualified trainers. 2022 saw floods affect the region, again preventing students from attending class.</p> <p>In the last 12 months there has been an increase in enrolments.</p> <p>The RTO's future plans are to continue with its current operations for stability with an eventual shift of its focus away from government funding.</p>			

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Qualifications/Units Audited ¹		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
SHB30121	<i>Certificate III in Beauty Services</i> <ul style="list-style-type: none"> SHBBMUP009 Design and apply makeup SHBXCCS007 Conduct salon financial transactions. 	MACE 429 Campbell Street Swan Hill
CHC33021	<i>Certificate III in Individual Support</i> <ul style="list-style-type: none"> CHCCCS031 Provide individualised support CHCCCS015 Provide individualised support (superseded 22/11/2022) HLTINF006 Apply basic principles of practices of infection prevention and control HLTINF001 Comply with infection prevention and control of policies and procedures (superseded 22/11/2022). 	MACE 429 Campbell Street Swan Hill

Interviewee(s) – Staff name and position; employer name and position	
Ms Leanne Shannon-Kelson	Centre Manager
De-Anna Rullo	Training Coordinator
Rebecca McMahon	Trainer

Permanent Delivery Sites –	Yes	No
Do the RTO's permanent delivery sites match the information provided by the VRQA?	X	

Third party Arrangements –	Yes	No
Do the RTO's third party arrangements match the information provided by the VRQA?	X	
N/A.		

¹ Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology

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Audit Summary - AQTF Conditions of Registration

AQTF Conditions Place an X in the appropriate column		Compliant	Non - Compliant	Not audited
1	Governance			X
2	Interactions with the Registering Body			X
3	Compliance with Legislation	X		
4	Insurance			X
5	Financial Management			X
6	Certification & Issuing of Qualifications & Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs	X		
8	Accuracy and Integrity of Marketing	X		
9	Transition to Training Packages/Expiry of Accredited Courses	X		
Summary of Non-Compliance²				
CF.6.1 Qualifications have been issued without sufficient, valid evidence to demonstrate competence in accordance with their respective training packages.				

² CF = Condition Finding. Finding references are aligned to the Detailed Findings section of this report.

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Audit Summary - AQTF Standards

AQTF Standards/Elements	Compliant	Non - Compliant	Not audited
Standard 1			
1.1 – Continuous Improvement Strategy		X	
1.2 – Training and Assessment Strategies		X	
1.3 – Training and Assessment Resources	X		
1.4 – Trainer and Assessor Competency	X		
1.5 – Assessment Strategies		X	
Standard 2			
2.1 – Meeting the Needs of Clients	X		
2.2 – Continuous Improvement of Client Services	X		
2.3 – Provision of Information to Clients	X		
2.4 – Third-Party Engagement in Training and Assessment	X		
2.5 – Provision of Support Services to Clients	X		
2.6 – Learner Access to Records of Participation		X	
2.7 – Complaints and Appeals Strategy	X		
Standard 3		X	
3.1 – Operations Management	X		
3.2 – Continuous Improvement of Operations	X		
3.3 – Third-Party Training and/ or Assessment Services			X
3.4 – Records Management		X	
Summary of Non-Compliance³			
<p>SF.1.1.1 The RTO has not collected, analysed and acted on all relevant data for continuous improvement of training and assessment.</p> <p>SF.1.2.1 Strategies for assessment do not meet the requirements of their respective training packages.</p> <p>SF.1.5.1 Assessment does not meet the requirements of the relevant training packages, has not been conducted in accordance with the Principles of Assessment and Rules of Evidence.</p> <p>SF.1.5.2 Assessment decisions and practises have not been systematically validated.</p> <p>SF.2.6.1 Students assessment records are not accurate.</p> <p>SF.3.4.1</p>			

³ SF = Standard Finding. Finding references are aligned to the Detailed Findings section of this report.

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The RTO has not managed records to ensure their accuracy and integrity.

Strengths

The RTO has established long term relationships with local schools for VETis which assists them to be informed of students' needs.
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Audit Summary – 2016 VRQA Guidelines for VET Providers

2016 VRQA Guidelines	Compliant	Non - Compliant	Not audited
1. Governance, Financial viability and Management systems			
1.1 – Strategic Plan and Business Plan			X
1.2 – Financial Viability			X
1.3 – Management Systems			X
1.4 – Governance			X
2. Transparency and oversight of third parties			
2.1 – Third party agreement			X
2.2 – Co-operation with VRQA			X
2.3 – Notifying VRQA of Third party agreements			X
2.4 – Information - Disclosure of third party services			X
2.5 – Pre-enrolment materials - Disclosure of third party services			X
2.6 – Changes to third party services			X
2.7 – Complaints - Third party services			X
2.8 – Appeals - Third party services			X
3. Trainer and assessor qualification (including individuals working under the supervision of a trainer)			
3.1 – Vocational & Industry skill requirements	X		
3.2 – Training and Assessment (TAE) skill requirements	X		
3.3 – Assessment only skill requirements			X
3.4 – Supervision arrangement requirements	X		
3.5 – Trainer under supervision skill requirements	X		
4. Delivery of training and assessment services			
4.1 – Training and assessment practices		X	
4.2 – Amount of training	X		
4.3 – TAE - Independent validation of assessment system, tools, processes and outcomes			X
4.4 – TAE – Trainer and Assessor skills (1 January 2016 to 31 December 2016)			X
4.5 – TAE – Trainer and Assessor skills (1 January 2017 onwards)			X
4.6 – TAE – Trainer under supervision requirements			X
4.7 – TAE – Registration requirements			X
5. Annual Declaration of Compliance			
5.1 – Annual Declaration of Compliance			X
6. Child Safe Standards			

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6.1 – First Nations cultural safety			X
6.2 – Child safety and wellbeing is embedded			X
6.3 – Empowerment of young people			X
6.4 – Families of young people are informed and involved			X
6.5 – Equity is upheld and diversity respected			X
6.6 – RTO supports employees working with young people			X
6.7 – Complaints processes respond to child safety concerns			X
6.8 – Staff and volunteers receive child safety training			X
6.9 – RTO environments are child safe			X
6.10 – Child safety processes are reviewed			X
6.11 – Policies and procedures ensure child safety practices			X

Summary of Non-Compliance⁴

GF.4.1.1

The RTO's assessment strategies are not consistent with their respective training packages and do not enable each student to meet the requirements for each unit of competency in which the student is enrolled.

GF.6.1

The RTO has not established a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued.

GF.6.2

The RTO has not demonstrated that child safety and wellbeing is embedded in organisational leadership, governance and culture.

GF.6.3

The RTO has not demonstrated how it ensures children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously.

GF.6.4

The RTO has not demonstrated how families and communities are informed, and involved in promoting child safety and wellbeing.

GF.6.5

The RTO has not demonstrated that equity is upheld and diverse needs respected in policy and practice.

GF.6.6

The RTO has not demonstrated how people working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice.

GF.6.7

The RTO has not demonstrated its processes for complaints and concerns are child focused.

GF.6.8

The RTO has not demonstrated that staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training.

⁴ GF = Guideline Finding. Finding references are aligned to the Detailed Findings section of this report.

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GF.6.9

The RTO has not demonstrated how its physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed.

GF.6.10

The RTO has not demonstrated that implementation of the Child Safe Standards is regularly reviewed and improved.

GF.6.11

The RTO has not demonstrated that its policies and procedures document how the organisation is safe for children and young people.

Detailed Findings - AQTF Conditions of Registration

CONDITION 1 - Governance

**Not audited in Phase 2
audit**

CONDITION 2 - Interactions with the Registering Body

**Not audited in Phase 2
audit**

CONDITION 3 - Compliance with Legislation

Compliant

Evidence/Documentation Reviewed

Student Information Guide - contained information relating to:

- the VRQA as a regulator and contact link for lodging complaints (page 13)
- privacy regulation and disclosure requirements of the RTO (page five)
- diversity, access and equity (page six)
- Occupational Health and Safety (page 13)

Staff Information Guide: provided information to staff regarding their obligations towards their role as a trainer.

Fact sheets folder: contains printed information on any changes to funding, regulation.

Continuous Improvement folder contained the following:

- Corrective Actions for Continuous Improvement table that included details of the date, issues identified, corrective actions required and date due, responsible staff member. This folder is monitored by the RTO Manager and discussed at weekly staff meetings to ensure ongoing monitoring and completion. Corrective actions included activities such as updates to training resources, updates to regulatory requirements and training packages.

Weekly staff meeting minutes: samples from 2023 included discussions on issues relating to improvements for training and assessment. E.g. resource updates, training changes.

Induction process: included provision of documentation regarding operations of the RTO and obligations to abide by them.

Child Safety Training: conducted by the RTO for all staff to ensure they understood their obligations.

CONDITION 4 - Insurance

**Not audited in
Phase 2 audit**

CONDITION 5 - Financial Management

**Not audited in
Phase 2 audit**

CONDITION 6 - Certification & Issuing of Qualifications & Statements of Attainment

Non-Compliant

Evidence/Documentation Reviewed

E10 Student Records Policy: outlined the procedures for maintenance and accessibility of students records, including timeframes for submission of outcomes, updating of students' Training Plans. In addition, it specified the requirements for qualifications and statements of attainment to meet the requirements of the AQF.

Student files reviewed at audit - contained copies of qualifications and Statements of Attainment on file; all contained information that:

- met the requirements of the AQF
- contained the RTO's TOID
- included the NRT logo in accordance with the conditions of use
- were issued directly to the student.

Statements of Attainment viewed in student files: contained the correct codes and titles of the units of competency, the RTO's national provider number and were issued directly to the Student. The requirements of use of the NRT logo were applied correctly.

Policy E21 Archiving of Records Policy: outlined the timeframes for storage of student records and required the retainment of client records of attainment for a period of 30 years.

VETtrak student management system: is AVETMISS compliant, and allowed for lodging AVETMISS reports and updating USI data.

[Resources - Murray ACE \(macesh.vic.edu.au\)](http://macesh.vic.edu.au): included a link to the USI website to provide further detail.

Enrolment forms requested USI information and provided further information regarding USI collection on page five.

VETtrak is a secure SMS and communicates data with USI behind the scenes for the purpose of updating issuance records.

Student files reviewed at audit: included completed enrolment forms with USI information included.

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

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Refer to findings at Element 1.5 regarding assessment decisions that are not in accordance with their respective training packages.		
CF.6.1	Finding	Required Rectification(s)
	As assessment decisions have been based on invalid, insufficient evidence, the RTO has issued qualifications to students that have not demonstrated competence in accordance with their respective training packages. Refer to Element 1.5 for findings.	Refer to Element 1.5 rectification requirements.

CONDITION 7 - Recognition of Qualifications Issued by other RTOs	Compliant
Evidence/Documentation Reviewed	
<p>Resources - Murray ACE (macesh.vic.edu.au): RTO website contained the Student Information Guide for downloading.</p> <p>Student Information Guide: page 16 communicated recognition of AQF Qualifications and Statements of Attainment issued by another RTO.</p> <p>E3 Training and Policy: page 36 stated that 'all AQF qualifications issued by any other RTO will be recognised...as evidence for credit transfer'.</p> <p>VETtrak Client Enrolment Reports: confirmed the application of Credit Transfer for students at enrolment.</p>	

CONDITION 8 - Accuracy and Integrity of Marketing	Compliant
Evidence/Documentation Reviewed	
<p>https://machesh.vic.edu.au: contained information on available courses at the RTO.</p> <p>http://www.facebook.com.au/murray.ace: the RTO's Facebook page contained information on available courses including the cost, delivery method and start dates.</p> <p>Qualifications and Statements of Attainment issued to trainers were viewed and contained all the correct details and use of NRT logo.</p> <p>2024-05-06 Courses On Offer Brochure: outlined the courses, short and Nationally Recognised Training, specified the hours, cost, duration in total, course fees and availability of funding.</p> <p>Murray ACE (@maceongray_murrayace) • Instagram photos and videos: MACE's Instagram page contained images of services available at MACE on Gray, prices for the services and examples of haircuts provided to clients.</p> <p>Welcome to Murray ACE Training Solutions (youtube.com): contained promotional videos of courses and facilities available at the RTO.</p> <p>Student Information Guide: page 6 informs the Student of their right to refuse consent to having their image in a photo or video for marketing purposes.</p>	

Newsletter: updates the Murray Ace Training Solutions community on activities undertaken during the last term and upcoming courses.

CONDITION 9 - Transition to Training Packages/Expiry of Accredited Courses

Compliant

Evidence/Documentation Reviewed

E2 Compliance Responsibilities Policy: specified the Centre Manager responsible for ensuring ‘transition from superseded training packages within 12 months of their publication on the National Register...so that it delivers only currently endorsed training packages’..

Transition of training package updates have occurred for both qualifications in focus at audit. Actions taken include:

- Trainers have completed matrices to demonstrate equivalence in competency.
- Assessment resources have been updated to meet the requirements of their respective training packages.
- The RTOs website, Facebook page, Instagram page and Youtube all reflect current Nationally Recognised Training (NRT) products.

[Murray ACE - Swan Hill Learning Centre \(macesh.vic.edu.au\)](http://macesh.vic.edu.au): the RTO website is not marketing any qualifications or units of competency not on its scope of registration.

VETtrak Client Enrolment Report: for three students confirmed transition from the superseded qualification to the current qualification.

Mapping identifying differences between the superseded units of competency and current units of competency for *SHB30121 Certificate III in Beauty*.

Improvement Opportunities

It is recommended the RTO develop a procedure that outlines the various components to be considered when managing transition from superseded training products. For example, ensuring the following is reviewed and updated where required:

- Trainer currency
- Training resources
- Assessment resources
- Student notification of transition requirements
- Timeframes
- Responsible persons.

Detailed Findings - AQTF Standards

ELEMENT 1.1 - The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment.

Non-Compliant

Evidence/Documentation Reviewed

Ms Leanne Shannon-Kelson, Centre Manager, advised:

- the different methods used to collect data. These included:
 - appeals/complaints.
 - surveys with students- IN HOUSE Murray Ace using QR codes everywhere to allow easy access. Data goes straight to an online software that automates the analysis and provides reports. Once a year the feedback survey report is presented to the Committee.
 - AQTF surveys are summarised with graphs and uploaded to the Regulator.
- there are no surveys from staff.

Weekly staff meeting minutes: samples from 2023 included discussions on issues relating to improvements for training and assessment; for example, resource updates, training changes.

Monthly trainer meeting minutes: samples confirmed trainers provided input towards ongoing management of training and assessment services via recommendations for improvements to courses; for example, updates to training plans, assessment cover sheets, discussions on attendance of students relevant to each course.

Training and Assessment Strategy: identified that feedback for the training programs is collected through AQTF Questionnaires (students and employers), trainer meetings and surveys, moderation meetings.

2024 Learner Questionnaire analysis reports: contained pie graphs resulting from data collected from completed AQTF Learner Questionnaires.

Summary Report of Quality Indicator (QI) data: for submission to the VET Regulator in 2022-2023.

Summary report on Murray ACE Learner Feedback: for 2022-2023, provided feedback specific to the course and their trainers.

Continuous Improvement folder contained the following:

- Corrective Actions for Continuous Improvement table that included details of the date, issues identified, corrective actions required and date due, responsible staff member.
- This folder is monitored by the RTO Manager and discussed at weekly staff meetings to ensure ongoing monitoring and completion.
- Corrective actions included activities such as updates to training resources.

Course Validation Folder 2021-2026 contained:

- Validation Plan 2022-2026: listed the training products on the RTO's scope of registration and the planned year for validation. The units for *SHB30115 Certificate III in Beauty Services* validated in 2021 did not include those in the audit focus. The current qualification is not scheduled for validation until 2026.

Completed Assessment Validation reports for multiple units of competency relevant to various qualifications examples viewed were conducted in 2023 in accordance with the Validation Plan

SF.1.1.1	Finding	Required Rectification(s)
	<p>Whilst the RTO does collect, analyse and act on relevant data for continuous improvement of training and assessment, validation is not reliable and sufficient to ensure continuous improvement of its assessment activities. Validation of assessment decisions have not been conducted.</p>	<p>The RTO is required to:</p> <ul style="list-style-type: none"> • review its validation activities to ensure it includes validation of assessment practises in accordance with the requirements of their respective training packages, the Principles of Assessment and Rules of Evidence • ensure identified issues at validation contribute to the RTO's own continuous improvement activities.

Improvement Opportunities
<p>It is recommended the RTO implement a mechanism for surveying staff to capture data specific to training and assessment content and processes to contribute toward its continuous improvement activities.</p>

<p>ELEMENT 1.2 - Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p><i>SHB30121 Certificate III in Beauty</i> Training and Assessment Strategy (TAS) – contained the following information:</p> <ul style="list-style-type: none"> • Volume of Learning (VoL) – 705 hours; consisting of 600 classroom hours, 40 hours salon experience at MACE on Gray Salon (or own location). • Clustering occurs resulting in reduction of delivery hours. • The VET two year course for VET In Schools students attend one day per week. • VET In Schools (VETis) occurs at Swan Hill and Charlton Secondary Schools. <p><i>CHC33021 Certificate III in Individual Support</i> TAS contained the following information specific to this TAS:</p> <ul style="list-style-type: none"> • VoL – 945 hours; consisting of 750 classroom hours, 2 hours of private study per week, 120 hours work placement. • Workplace locations for work placement. <p>Information contained in both TAS' included:</p> <ul style="list-style-type: none"> • packaging of the qualifications that align with the training package requirements • delivery methods (lectures/presentations, online, projects, videos/webinars) • conduct of a pre-training review (PTR) • the availability of Language, Literacy and Numeracy (LLN), Credit Transfer (CT), Recognised Prior Learning (RPL) • target learners • support mechanisms • ACSF level requirements of 3 for all components • Pathways • flexibility for participants that wish to study extra hours per week to attain qualification quicker • trainers to deliver and assess the qualification. 	

Ms Leanne Shannon-Kelson, Centre Manager, and De-Anna Rullo, Training Coordinator, advised: there were no other documents in place that outlined when assessment occurred throughout the courses.

Industry Consultation

SHB30121 Certificate III in Beauty

Industry Engagement/Consultation Report: dated 24/11/2023, confirmed the overall relevance and suitability of the course and strategy. It contained a recommendation for more placement hours.

CHC33021 Certificate III in Individual Support

Industry Engagement/Consultation Report: dated 20 and 21/02/2023, 12/07/2023, with Managers from Respect Age Care (Alcheringa, Cohuna Village) and Hope Age Care Swan Hill, confirmed satisfaction with the strategy and course content.

SF.1.2.1	Finding	Required Rectification(s)
	<p>Strategies for assessment do not meet the requirements of their respective training packages. The TAS' contained no information regarding when assessment would occur in their timetabling.</p>	<p>The RTO is required to review and amend their TAS' to include details of when assessment will occur during the course schedules.</p>

<p>ELEMENT 1.3 - Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p><i>SHB30121 Certificate III in Beauty</i> <u>Staff</u> Refer to Element 1.4 for detail.</p> <p><u>Facilities</u> Dedicated rooms for:</p> <ul style="list-style-type: none"> • manicures, pedicures and makeup • waxing • tanning booth • storage of colours • laundering of towels and protective aprons and access to toilet for people with disability. <p>MACE on Grey: a hairdressing salon accessible from Gray Street, providing haircuts to the general paying public (note: paying customers were present in the salon for both haircuts and waxing during audit); contained six stations with mirrors and resources and two wash basins. A classroom is attached to MACE on Gray with four mirrors and seven benches.</p> <p>Salon software: Square providing for booking and processing of payments including EFTPOS and cash.</p> <p><u>Training/assessment and equipment resources</u> Online training system: located at https://skindeeplearning.com.au/; resources available for delivery included: a PowerPoint slide show for students to access.</p> <p>Wigs, colours, general beauty resources were all present at audit.</p> <p><u>Assessment resources</u> Refer to Element 1.5 for detail.</p> <p><i>CHC33021 Certificate III in Individual Support</i> <u>Staff</u> Refer to Element 1.4 for detail.</p> <p><u>Facilities</u></p>	

Classroom catering up to 15 students.

A Victorian government Standard VET Purchasing Contract: completed for Charlton College, Swan Hill College and Kerang Technical High School. Included detail of (but not limited to) the following:

- Provision of Services by the RTO.
- Student suitability.
- Duty of care to the students.
- Supervision of students – in accordance with the Department’s Policies and Procedure on Supervision.
- The Child Safe Standards.
- Access to the premises.
- No allowance for sub-contracting.
- Complaints and appeals responsibilities.

Training/assessment and equipment resources

Training resources

Individual Support Disability published by McGraw Hill, 2024: learning resource referred to throughout the course; relevant to the units of competency for the qualification.

Ms Leanne Shannon-Kelson, Centre Manager, advised the Trainer is still identifying gaps in the learning resource and is developing additional material as a result.

Trainer Resources folder for the qualification: contained multiple additional sheets of information and activities to be undertaken during delivery, created by the trainers.

Hospital bed.

Dummy of aged man.

Ms Leanne Shannon-Kelson, Centre Manager, advised: lifting equipment is hired when needed. This ensures only up to date machinery is used.

Assessment resources

Refer to Element 1.5 for detail.

General facilities

Student lunch area with six computers to allow students to use any time throughout the day.

Records room: housed all completed student records.

Resources room: contained all training and assessment resources and filing cabinets containing current student files.

Reception area and an office for trainers to utilise.

Administration rooms for the Manager and staff of the RTO.

Tea room and lunch room for the trainers.

Board and training room: contained eight monitors and provision for up to 10 students at the table. All training rooms contained whiteboards.

Kitchen and training room for Food Safety training and other courses.

Work placement resources:

Industry Contact Report: regularly completed and included observations by the Trainers regarding the suitability of work placement locations. Multiple examples viewed in Industry Consultation folder.

Practical Placement Agreements: to be in place between the RTO and employers for the purpose of work placement. They outlined:

- the employer's responsibilities
- insurance arrangements
- the RTO's responsibilities
- the Student's responsibilities

Employers Information Placement Book: for the Employer; explained the role and expectations of the Trainer, the Student and the Supervisor whilst the Student is on placement and included details of the completion of the Practical Placement Assessment Book.

Student Information Placement Book: duplicated the information within the Employers Information Placement Book and requirement for a Confidentiality declaration to be signed.

Industry Skills Placement contained the details of:

- the workplace for placement
- a timetable for the Assessor to visit the workplace
- the course units of competency
- an induction checklist
- a questionnaire on how they have used Employability Skills during their placement
- a reflection journal, to be completed on a daily basis, to outline their activities for the day and their feelings on their completion
- an RTO Trainer and Assessor sign off sheet confirming completion of the work placement and above documentation

- Personal Care Assessment sheet to record the observations of the Student completing a showering procedure according to a Personal Care Plan
- Record of Hours – requires the Supervisor to confirm the Student's attendance (date, start, break and end times)
- Sheets relevant to each unit of competency that the Supervisor confirms the activities (based on a unit's Performance Evidence requirements) the Student has completed and confirms they are done so in a satisfactory manner.

Files reviewed at audit confirmed work placement agreements were in place for all students

Improvement Opportunities

It is recommended the RTO implement a suitability checklist, to be completed by the relevant trainer, for each venue to ensure all required equipment is present for workplace.

<p>ELEMENT 1.4 - Training and assessment is delivered by trainers and assessors who:</p> <p>a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and</p> <p>b) have the relevant vocational competencies at least to the level being delivered or assessed, and</p> <p>c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and</p> <p>d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>SHB30121 Certificate III in Beauty TAS specified the trainer/s as:</p> <ul style="list-style-type: none"> • Hannah Oliver • Brooke Turvey <p>Hannah Oliver <u>Qualifications</u> TAE40116 Certificate IV in Training and Assessment: issued by SuniTAFE, dated 01/12/2023; certificate number A31039. Statement of Attainment, HLTAID009 Provide cardiopulmonary resuscitation, issued 18/03/2024 by Murray ACE Training Solutions; statement number 07005. Statement of Attainment, HLTAID009 Provide cardiopulmonary resuscitation and HLTAID011 Provide first aid issued 06/03/2023 by Murray ACE Training Solutions; statement number 06242. Statement of Attainment, SHBBNLS003 Apply acrylic nail enhancements, dated 08/08/2018, issued by Murray Ace Training Solutions; statement number 3859. SHB50115 Diploma of Beauty Therapy: issued 15/12/2017 by Elly Lucas Beauty Therapy College TOID 3789; certificate number 05074.</p> <p><u>Work history</u> Resume: detailed a work history of management of The Beauty Spot (a beauty salon) in Swan Hill since 2018. Day Spa The Beauty Spot - Beauty Salon & Day Spa Swan Hill (thebeautyspotsh.com): website viewed 05/06/2024, confirmed the beauty services provided.</p> <p><u>Professional Development</u> Professional Development (PD) Plan: listed the PD undertaken in 2022, 2023 and 2024. VET skills and knowledge was satisfied by undertaking the TAE qualification during 2023. Industry experience is satisfied by current employment in a salon. Proof of attendance was contained in the trainer's file. Competency Matrix: outlined current work experience relevant to the units of competency for SHB30121 Certificate III in Beauty.</p>	

Brooke Turvey

Qualifications

TAE40116 Certificate IV in Training and Assessment: issued by Sunraysia Institute, dated 29/10/2018; certificate number A19359.

Statement of Attainment: *HLTAID001 Provide Cardiopulmonary resuscitation* and *HLTAID003 Provide First Aid*; issued 15/05/2020 by Murray ACE Training Solutions; statement number 04569.

SHB50115 Diploma of Beauty Therapy: issued 06/05/2020 by Bendigo TAFE TOID 3077; certificate number 10033898.

Academic transcript from Victoria University for the Diploma of Beauty; issued 18/10/2017.

WRB50199 Diploma of Beauty Therapy: issued by Victoria University 07/06/2006.

Work history

Resume: is an owner and works in her own home beauty salon since 2009. 2006 to 2009 owned and managed a hair and beauty salon.

Competency Matrix: dated 25/01/2024, the Trainer is currently working in the industry providing beauty services.

Professional Development

Professional Development Plan: listed PD undertaken in 2023; three events occurred in February, March and August. Training related to Microdermabrasion, Domestic Violence and Galvanic Machine training.

PD undertaken in 2021 included 'improve student learning' a webinar on 'effective feedback that improves student learning'; There was no PD listed for 2023 or 2024 as the trainer was on Maternity Leave from 31/07/2021 to October 2023.

CHC33021 Certificate III in Individual Support

TAS specified the trainer/s as:

- Rebecca McMahon (under supervision)
- Mary Uebergang.

Rebecca McMahon

Qualifications

CHC33015 Certificate III in Individual Support: dated 13/03/2024, issued by Murray ACE Training Solutions; certificate number 06991. Note: ASQA site confirmed transition arrangements for this qualification are extended to 31/12/2024.

CHC43115 Certificate IV in Disability: dated 20/12/2023, issued by Genu Training TOID 5553, certificate number 88860

Statement of Attainment: HLTAID009 Provide Cardiopulmonary resuscitation and HLTAID011 Provide First Aid; issued 13/08/2023 by Murray ACE Training Solutions; statement number 05867.

Discussion with Rebecca McMahon: confirmed enrolment requirements for progression through the course.

Work history and associated documents

Resume: outlined work experience as a Support Worker from 2019 to current day.

WWCC expiry 29/10/2024; card number 1826255A-01.

Criminal History Check Certificate dated 30/03/2022.

Competency Matrix: outlined current work experience to the units of competency for CHC33021.

www.figsupports.com.au: confirmed the Trainer as the owner/operator of Figs Support and the Aged Care and Disability support services provided.

Professional Development

Professional development as a Trainer is undertaken during the supervision period.

Currently *undertaking* online training completing the *TAE40122 Certificate IV in Training and Assessment* with Plenty Training.

Plenty Training Tax Invoice dated 09/04/2024 confirmed payment for enrolment for *TAE40122 Certificate IV in Training and Assessment* for Rebecca McMahon 10/04/2024.

Mary Uebergang

Note: a checklist at the front of the file dated 22/01/2024 and signed by Leanne Shannon-Kelson, stated 'Mary retired from her teaching role Dec 2024'.

Ms Leanne Shannon-Kelson, Centre Manager, advised: the trainer has remained on as an assessor and supervisor for Rebecca McMahon.

Qualifications

TAE40116 Certificate IV in Training and Assessment: issued 08/03/2019 by Sunraysia Institute; certificate number A20606.

CHC40302 Certificate IV in Disability Work: dated 12/12/2007, issued by University of Ballarat TOID 4909, no certificate number present.

Statement of Attainment: HLTAID009 Provide Cardiopulmonary resuscitation and HLTAID011 Provide First Aid; issued 12/02/2023 by Murray ACE Training Solutions; statement number 02509.

Statement of Attainment: HLTAID001 Provide Cardiopulmonary resuscitation and HLTAID003 Provide First Aid; issued 15/05/2020 by Murray ACE Training Solutions; statement number 04570.

Work history and associated documents

Resume: outlined work experience as a Disability Support Worker from 2005 to 2016. From 2016 to present day, worked as a trainer/assessor for MADEC and MACE; is a current volunteer committee member of Beyond Community Inclusion Inc. Horsham (since 04/2019).

WWCC *expiry* 27/08/2027; card number 03559482-03.

Criminal *History* Check Certificate dated 01/10/2022.

Professional Development

Professional Development Plan: in place for 2023, listed the newsletters and online training undertaken. None of the PD included VET or industry related skills training in 2022. The PD for 2022 included online workshops on 'setting up your digital workspace', 'effective feedback that improves student learning' and 'using your creative brain' as well as learning styles, providing feedback to students, dealing with struggling students.

Professional Development Plan: outlined professional development undertaken in 2021 for maintaining currency in the Disability Support sector. It included PD on infection control, Aged Care advocacy training,

Improvement Opportunities

It is recommended that Competency Matrices completed by staff, to demonstrate equivalence in competence with the updated qualification, contain more detail specific to each unit of competency. This should include examples of activities undertaken in the workplace.

<p>ELEMENT 1.5 - Assessment including Recognition of Prior Learning (RPL): a) meets the requirements of the relevant Training Package or accredited course b) is conducted in accordance with the principles of assessment and the rules of evidence c) meets workplace and, where relevant, regulatory requirements d) is systematically validated.</p>	<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p><i>SHB30121 Certificate III in Beauty</i> Student files reviewed: 11183, 10899, 10917, 10381, 10843. TAS specified assessment methods to be observation and oral questioning, practical tasks, written task. Assessment resources are stored at the Skindeep website at https://skindeeplearning.com.au/.</p> <p><i>SHBBMUP009 Design and apply makeup</i> The RTO's assessment system consisted of the following documentation:</p> <ul style="list-style-type: none"> • Unit commencement cover sheet: identifies the assessment activities to be completed, requirement to abide by the RTO's policies and procedures and agreement by the Student to undertake the assessment. • Assessment Cover Sheet: recorded the outcomes of each assessment task. Assessment activities consisted of observation of practical assessment and a knowledge questionnaire. • Assessment tools – as outlined below. <p>Performance assessment consisted of:</p> <ul style="list-style-type: none"> • observation of the student using various products and techniques to perform the following actions: <ul style="list-style-type: none"> ○ Conduct client consultations and record them on the Consultation Forms ○ Design and explain a makeup plan for each client. ○ Colour matching to clients ○ Creating winged liners for evening wear ○ Blending, contouring and highlighting ○ Applying false lashes ○ Provide advice on maintenance and removal of lashes and removal of makeup. ○ Completion of client consultation forms for four clients. 	

Knowledge Assessment consisted of: 26 questions to be responded to in writing.

De-Anna Rullo, Training Coordinator: advised files are checked for accuracy however, checks have focused on quantity of submissions, not accuracy of responses.

Identified issues:

Practical Assessment: Practical Assessment instructions for the student outline what the student must do throughout the activity. There are no instructions to the assessor for the purpose of recording what they actually observe. The Client Consultation Forms are signed and dated by the assessor and ticked as satisfactory but there is no record of what was actually observed by the assessor.

10381: the Assessor Guide does not match the actual assessment uploaded by the student; for example, question one required Infection Control Procedures to be input however the student's uploaded assessment had this removed and the question was marked as correct by the Assessor.

10843: Answer to question nine was not included in the Assessor Guide however was marked as correct. Question 25 not answered correctly yet was marked as correct.

Observation Checklist: is stored online however, it was not completed for any of the files reviewed.

SHBXCCS007 Conduct salon financial transactions

The RTO's assessment system consisted of the following documentation:

- Unit commencement cover sheet: identifies the assessment activities to be completed, requirement to abide by the RTO's policies and procedures and agreement by the Student to undertake the assessment.
- Assessment Cover Sheet: recorded the outcomes of each assessment task. Assessment activities consisted of Observation of practical assessment and a knowledge questionnaire.
- Assessment tools – as outlined below.

Knowledge questionnaire: consisted of 13 questions and two case studies to respond to.

Performance Assessment: required the students to operate Point of Sale equipment including performing cash and non-cash sales, processing a refund, opening and closing the POS, monitoring the POS throughout the day, reconciling the takings, counting and completing the daily float sheet and bagging the takings.

<https://skindeeplearning.com.au/>: contained templates of Observation Sheets. These sheets are not present on the students' files.

Identified issues.

10843: knowledge assessment was marked as correct however case studies 1 and 2 were not answered correctly; figures were incorrect or missing.

10917: no knowledge assessment was loaded onto Skindeep however a competency outcome was recorded.

Observation Sheets have not been completed and stored on student records (electronic or file).

CHC33021 Certificate III in Individual Support

Note: students had not completed any Individual Support related units of competency this year. *CHCCS031 Provide individualised support* has not been delivered and assessed as at audit date, the previous non-equivalent unit of competency assessment evidence was reviewed, in addition to review of process to identify gaps for new assessment tools.

Student files reviewed at audit: 08952, 06906, 04381, 10344, 10329.

TAS specifies assessment methods to be short answers, case studies, practical observation and a record of placement

CHCCS015 Provide individualised support (superseded 22/11/2022)

Assessment resources included:

- Assessment Cover Sheet: identified assessment as Questions and Case Study questions
- Assessment task one – 11 knowledge questions
- Assessment task two – Case Study questions.
- Portfolio – Section 1 students description of three persons they have provided individualised support to and how. The supervisor of the student in the workplace signs to confirm the student's claims.
- Portfolio – Section 2 Assessor observations: listed 11 observations in a checklist.
- Portfolio – Section 3 responding to questions regarding each person providing support to. The supervisor is required to provide comments and sign to endorse the correctness of the information.
- Portfolio – Section 4 Critical reflections; the student reflects on their actions, identifying what went well and what could be improved and how.

Ali McGraw Assessment resources implemented 06/2023 required:

- 26 knowledge questions
- Presenting a paragraph about the values, responsibilities and barriers in becoming a care worker.
- Accessing the myagedcare.gov.au website and collect information useful to the role of a care worker.

Identified issues:

10329, 10344, 06906: included:

- There were two assessment coversheets for this unit on file. The first did not list practical placement as a requirement. The second assessment coversheet included requirement for practical placement. It was unclear why there were two on record and why the first did not list a requirement for a practical placement.
- Assessment requirements for the unit of competency required the student to be observed using individualised plans as the basis for the support of three individuals. There was no record of this observation for this unit on the students' file.

- There were no portfolios on these students' files.

The Portfolio Section 2 Assessors Observations checklist lacked detail of what was actually observed; for example (but not limited to) 'Use support equipment properly?' It does not detail which equipment was used and what 'properly' was supposed to look like.(validity, reliability, sufficiency).

HLTINF006 Apply basic principles of practices of infection prevention and control (current from 22/11/2022)

Assessment resources included:

- Assessment Cover Sheet: identified assessment as Questions and Case Study questions and Practical Placement
- Assessment task one – 17 questions (not including sub-questions) to be responded to in writing.
- Assessment task two – six questions relating to a case study requiring a written response.
- Observation checklist for observing student during work placement with 18 observations to be satisfied.

HLTINF001 Comply with infection prevention and control of policies and procedures (superseded 22/11/2022)

Assessment resources included:

- Assessment Cover Sheet: identified assessment as Questions and Case Study questions.
- Assessment Task one – 13 knowledge questions

Identified issues:

HLTINF006 Apply basic principles of practices of infection prevention and control

08952: Assessment requirements for the unit of competency requires the student to be observed completing the practical tasks on three different occasions, each responding to a different identified infection risk; only one record of observation was present on the student file.

HLTINF001 Comply with infection prevention and control of policies and procedures (superseded 11/2022)

06906, 04381, 10344, 10329: there was no evidence of an assessment of skills for this unit. Performance evidence for the unit required observation on three occasions.

10344: Student Assessment Agreement was not completed and signed by the student or the RTO. The Assessment Task 1 Checklist listed 14 questions as answered correctly by the assessor however, there were 13 questions in total in the assessment document answered by the student.

CHCCCS031 Provide individualised support

Note: this unit of competency had not yet been delivered and assessed by the RTO due to its recent implementation.

Assessment resources included:

Assessment mapping: identified the various assessment methods and the components of the unit of competency they address.

Final Assessment Marking Guide: provided guidance to the assessors on expected content and observations for the following assessment activities.

Assessment Task 1 – 20 questions to respond to in writing; two case studies with questions to respond to.

Assessment Task 2 – Observation – consisted of five sections.

Section one - observation of a student determining a person's personal preferences and support requirements.

Section two - providing personal support services to people with individualised care plans, using aids and equipment. Part A, tasks must be undertaken on three occasions with simulation occurring prior to being assessed in the workplace. Part B, various activities to be completed in a simulated environment on three occasions; for example, but not limited to, bed bathing, shaving.

Section three – delivering support services whilst demonstrating how to use assistive technologies, including families and other carers as part of the support team, seeking assistance from a supervisor when required.

Section four – monitoring support, identifying any requirements for change and report changes.

Section five – Complete reporting and documentation in accordance with organisation policies and procedures.

Final Assessment Workbook contained:

- the questions and instructions for completion of assessment tasks
- Observation Record Sheets to be completed by the assessor in conjunction with referral to the Assessment Marking Guide
- Record of Outcome sheet the records the outcomes for all assessment tasks and final competence result.

Recognised Prior Learning

Ms Leanne Shannon-Kelson, Centre Manager, advised: the RTO has one kit in place; no students have requested RPL to date.

RPL Assessment Tool Kit consisted of a template from the Western Australian Department of Training and Workforce Development, with the following components:

- An overview of the recognition process.
- Section 1 – Instructions to the Assessor on the RPL process.
- Section 2 – List of competencies (in the RPL tool kit) – the RTO is required to fill the template with the relevant unit codes and titles.
- Section 3 - Interview Question Bank and Recording Sheets – the RTO is required to insert the relevant questions and record the responses provided by the Candidate (Student).
- Section 4 – Practical Tasks and Observation Recording Sheets – all observation sheets are required to be populated with detail of the tasks to be performed and the relevant observations expected.

- Section 5 – Candidate’s Information and Self-Evaluation Forms – required the Student to provide their personal information, employment history and self-evaluate their performance on tasks relevant to the units of competency/qualification; the RTO was required to populate the information in this section.
- Section 6 – Third Party Report and Supporting Documentation – a template to be populated by the RTO and a Supervisor of the Student to confirm claims of employment history and activities in the workplace and a template to list supporting documentation; Assessor’s Evidence Summary Sheet – to record the evidence reviewed and outcomes.
- Section 7 – Mapping of Assessment Tools – to be completed by the RTO, to identify which questions and tasks align with the components of the various units of competency.

Validation

Course Validation Folder 2021-2026 contained:

- Validation Plan 2022-2026: listed the training products on the RTO’s scope of registration and the planned year for validation. The units for *SHB30115 Certificate III in Beauty Services* validated in 2021 did not include those in the audit focus. The current qualification is not scheduled for validation until 2026.

Completed Assessment Validation reports: for multiple units of competency relevant to multiple qualifications examples viewed were conducted in 2023 in accordance with the Validation Plan.

SF.1.5.1	Finding	Required Rectification(s)
	<p>Assessment does not meet the requirements of the relevant training package, was not conducted in accordance with the Principles of Assessment and Rules of Evidence and was not systematically validated. Assessment practice was not reliable, resulting in assessment evidence that was not valid or sufficient.</p> <p><i>SHB30121 Certificate III in Beauty</i> <i>SHBBMUP009 Design and apply makeup</i></p> <p>Assessors are not recording their observations of students completing the practical assessment activities for this unit of competency.</p> <p>Students’ work is being marked correct by assessors when answers are not correct or complete.</p> <p>Assessment tools lacked instructions to guide the assessors on what was to be observed during practical assessment.</p> <p><i>SHBXCCS007 Conduct salon financial transactions</i></p>	<p>The RTO is required to:</p> <ul style="list-style-type: none"> • implement a process that reviews assessment documentation and outcomes from assessors to check for completion and accuracy, prior to entering outcomes into VETtrak. • provide evidence it has conducted training for its assessors to ensure they understand the required record keeping requirements when conducting assessment • review its assessment tools to ensure they meet the requirements of their respective training packages, the Principles of Assessment and Rules of Evidence.

<p>Students' work is being marked correct by assessors when answers are not correct or complete.</p> <p>Completed observation checklists were not completed and stored on the students' records.</p> <p>CHC33015 Certificate III in Individual Support <u>HLTINF006 Apply basic principles of practices of infection prevention and control</u> Performance evidence requirements were not satisfied; only one record of observation was present on a student file when the requirement to be satisfied is three.</p> <p><u>HLTINF001 Comply with infection prevention and control of policies and procedures</u> There was no evidence of skills evidence for four students.</p> <p>Assessment outcome sheets did not match the actual assessment tasks completed by the students.</p> <p>Assessment documentation was not complete for all students.</p>	
<p>SF.1.5.2 Finding</p>	<p>Required Rectification(s)</p>
<p>There was no validation of assessment decisions and practises to confirm they satisfied the requirements of their respective training packages, the Principles of Assessment and the Rules of Evidence.</p>	<p>The RTO is required to:</p> <ul style="list-style-type: none"> • review and amend its Validation Plan to include validation of assessor decisions and assessment practises • ensure validation occurs for those qualifications being delivered at present.

<p>Improvement Opportunities</p>
<p>It is recommended the RTO review and amend the observations in the marking guide for <i>CHCCCS031 Provide individualised support</i>:</p> <ul style="list-style-type: none"> • to be written as though the assessor is the audience, not the student • remove the term 'etc' in the exemplar observations; all expected observations must be listed and not provide for subjectivity by the assessor.

2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.	Compliant
Evidence/Documentation Reviewed	
<p>E11 Student Enrolment and Support Policy – contained the following:</p> <ul style="list-style-type: none"> • The requirements for a pre-enrolment interview (PTR) and LL&N assessment. • The information to be provided at the PTR (page 60) including eligibility for funding, the Student Information Guide, fees and charges, the refund policy, material fees, amenities fees, curriculum structure, RPL and CT processes available, withdrawal policy. • Page 61 listed all information that must be discussed with the Student. <p>Files reviewed at audit confirmed the completion of the following documents during the enrolment process:</p> <ul style="list-style-type: none"> • Enrolment Form – collected all required AVETMISS data, USI information and included information on refunds, privacy, request for consent to opt in for photographs to be used for marketing purposes. • Training and Assessment Strategy – contained the selection and delivery dates of units of competency. • Student Training Plan – identified the start and end date of delivery and assessment, the delivery mode, the assessment methods, the assessment outcome and signature of the Assessor. • VETtrak Client Enrolment Report – confirmed completion of all units for the qualification. • Industry Skills Placement documents – confirmed work placement details such as Supervisor contact details, record of hours and activities undertaken at work placement. • Practical Placement Agreement between Employer and RTO. • ACSF Assessment Tasks – for the purpose of assessing a student’s LLN levels. It contained three sections, 1) questions related to a paragraph on forklift safety 2) Making numbers work 1 and 2 (questions on numeracy), 3) the ACSF Assessment record, to record the assessor’s judgement and recommendations for support. <p>Note: more recently LLN Robot has been implemented resulting in more detailed reports of analysis of data and recommendations for actions.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: LLN and PTR is only conducted for funded students. VETis students do not undertake this process as the schools advise of any learning issues that may require reasonable adjustment to the training plan.</p>	

2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.	Compliant
Evidence/Documentation Reviewed	
<p>Refer to evidence at Element 1.1.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: AQTF questionnaires are issued via email to employers. The RTO does not generally receive a lot back. The RTO is planning to require trainers to take them out with them to increase the return rate..</p> <p>Continuous Improvement folder: contained records of changes to multiple aspects of the RTOs operation and input as a result of surveys. The actions to be completed are monitored by the Centre Manager ensure progress of activities and signed off and discussed at the staff meetings on each occasion.</p> <p>Industry Consultation Folder: systematic completion of Industry Contact Reports record interaction with employers regarding services provided by the RTO during placement. These documents provide feedback to the RTO for continuous improvement purposes.</p>	

<p>2.3 - Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>Refer to Condition of Registration 8 for detail of marketing evidence and activities employed by the RTO.</p> <p>Refer to evidence for Element 2.1 for information provided to the students at enrolment and contents of enrolment documentation, including written agreements.</p> <p>Student Information Guide: provided the following information on:</p> <ul style="list-style-type: none"> • support services for students (page six) • pre-training review interview will outline the Student’s rights and obligations (page six) • Language, Literacy and Numeracy (LLN) (page seven) • students with special needs (page seven.) <p>Student Information Guide questionnaire: required the Student to answer questions regarding the Student Information Guide; assists in them being informed.</p> <p>Work Placement Agreement: provided guidance on the obligations of the RTO, employer and the student throughout work placement.</p> <p>E11 Student Enrolment and Support Policy: page 61 detailed the information to be discussed at the PTR including LLN and RPL availability. Page 62 discussed the options available to students found to have LLN difficulties; for example, enrolment in Certificate II in Skills for Work and Vocational Pathways.</p> <p>Industry Contact Report: regularly completed and included observations by the trainers regarding the suitability of work placement locations; multiple examples were viewed in the Industry Consultation folder.</p> <p>Practical Placement Agreements – to be in place between the RTO and employers for the purpose of work placement. They outlined:</p> <ul style="list-style-type: none"> • the employer’s responsibilities • insurance arrangements • the RTO’s responsibilities • the student’s responsibilities <p>Employers Information Placement Book: for the employer; explained the role and expectations of the trainer, the student and the supervisor whilst the student is on placement and included details of the completion of the Practical Placement Assessment Book.</p> <p>Student Information Placement Book: duplicated the information within the Employers Information Placement Book and requirement for a confidentiality declaration to be signed.</p>	

Industry Skills Placement contained the details of the following:

- The workplace for placement.
- A timetable for the assessor to visit the workplace.
- The course units of competency.
- An induction checklist.
- A questionnaire on how students have used Employability Skills during their placement.
- A reflection journal, to be completed on a daily basis, to outline their activities for the day and their feelings on their completion.
- An RTO trainer and assessor sign off sheet confirming completion of the work placement and above documentation.
- Personal Care Assessment sheet to record the observations of the student completing a showering procedure according to a Personal Care Plan.
- Record of Hours – required the Supervisor to confirm the student's attendance (date, start, break and end times).
- Sheets relevant to each unit of competency that the supervisor confirms the activities (based on a unit's Performance Evidence requirements) the student has completed and confirms they are done so in a satisfactory manner.

Files reviewed at audit confirmed work placement agreements were in place for all students.

Student numbers for files reviewed: 08952, 06906, 04381, 10344, 10329.

<p>2.4 - Employers and other parties who contribute to each learner’s training and assessment are engaged in the development, delivery and monitoring of training and assessment.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>Industry Contact Report: regularly completed and included observations by the trainers regarding the suitability of work placement locations. Multiple examples viewed in Industry Consultation folder.</p> <p>Practical Placement Agreements: were in place between the RTO and employers for the purpose of work placement. They outlined:</p> <ul style="list-style-type: none"> • the employer’s responsibilities • insurance arrangements • the RTO’s responsibilities • the student’s responsibilities. <p>Employers Information Placement Book: for the employer; explained the role and expectations of the trainer, the student and the supervisor whilst the student is on placement and included details of the completion of the Practical Placement Assessment Book.</p> <p>Student Information Placement Book: duplicated the information within the Employers Information Placement Book and a requirement for a Confidentiality declaration to be signed.</p> <p>Industry Skills Placement contained the details of:</p> <ul style="list-style-type: none"> • the workplace for placement • a timetable for the Assessor to visit the workplace • the course units of competency • an induction checklist • a questionnaire on how they have used Employability Skills during their placement • a reflection journal, to be completed by the student on a daily basis, to outline their activities for the day and their feelings on their completion • an RTO trainer and assessor sign off sheet confirming completion of the work placement and above documentation • Personal Care Assessment sheet to record the observations of the student completing a showering procedure according to a Personal Care Plan • Record of Hours – requires the supervisor to confirm the student’s attendance (date, start, break and end times) 	

Sheets relevant to each unit of competency that the supervisor confirms the activities (based on a unit's Performance Evidence requirements) the student has completed and confirms they are done so in a satisfactory manner.

Industry Engagement/Consultation Reports: are completed for every visit and contribute to the ongoing monitoring and review of work placement training activities..

All student files reviewed at audit contained completed workplace agreements.

2.5 - Learners receive training, assessment and support services that meet their individual needs.

Compliant

Evidence/Documentation Reviewed

Refer to evidence at Element 2.1 and 2.3.

2.6 - Learners have timely access to current and accurate records of their participation and progress.

Non-Compliant

Evidence/Documentation Reviewed

VETtrak Client Enrolment Reports: are contained on all files listing units of competency assessment outcomes.

E10 Student Records Policy: outlined the procedures for maintenance of students records, page 58 specifies the requirement for quality records stating, 'ensure that student results accurately reflect achievement against the documented assessment criteria'.

Student Information Guide: page 11 advised students of the RTO's obligation to retain outcomes for 30 years and how to access their records of participation.

Student records reviewed at audit confirmed inaccurate record of participation and progress (refer to evidence for Element 1.5).

Assessment records were not accurate. Refer to Element 1.5 evidence.

SF.2.6.1 Finding

Required Rectification(s)

The RTO has not ensured that learners have access to accurate records of their participation and progress.
Refer to findings at Element 1.5 for detail.

The RTO is required to:

- refer to rectification requirements for Element 1.5.

<p>2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</p>	<p>Compliant</p>
<p>Evidence/Documentation Reviewed</p>	
<p>E20 Student Assessment Appeals policy: the policy for governing responses to student appeals and complaints. It included the following:</p> <ul style="list-style-type: none"> • All complaints, appeals or grievances are directed to the Training Coordinator or Centre Manager. • The Training Coordinator will attempt to resolve and respond to the appellant/complainant within two working days in writing and the overall process to be resolved within 10 working days. • If unable to resolve the appeal/complaint it will be referred to the Centre Manager for review. • The Centre Manager will refer the appeal/complaint to the Committee of Management, if required, for the creation of an Assessment Appeals Committee (members of the Murray ACE community, not legal counsel or family members). • The appellant/complainant may have assistance of a third person during any meetings (but not legal counsel). • Decisions made by the AAC must be in writing and outline the reasons for the decision and any actions to follow. • The complainant/appellant has a right to escalate the matter further to an independent body such as a mediation service, the VRQA and/or National Training Complaints Hotline or the Victorian Ombudsman. <p>Complaint form: to be completed by students if they wish to make a complaint; required the student to explain what the complaint is about, area of the RTO's operations it relates to, witnesses and actions requested. It also requires any actions taken to be recorded on the reverse by the Centre Manager and if escalation is required.</p> <p>Student Information Guide: page 11-13 informed the student of the definition of a complaint and appeal and their right to lodge a complaint or appeal. The complaint/appeal process was briefly outlined and the student is informed that RTO's policies are available on request. A URL to the VRQA website for lodging a complaint is provided on page 13.</p> <p>Complaints folder contained: multiple complaints dated 2022 specific to incidents of various kinds. There were no appeal forms completed.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: the RTO has not had any appeals lodged.</p>	

3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.	Compliant
Evidence/Documentation Reviewed	
<p>Refer to evidence in Elements 2.3 and 2.7.</p> <p>Policies and procedures referred to throughout this report assist the RTO to maintain operations and provision of services to its clients.</p> <p>Student files reviewed at audit all contained signed agreements with each student and employer outlining each parties roles and responsibilities to ensure delivery of the agreements.</p>	
3.2 - The RTO uses a systematic and continuous improvement approach to the management of operations.	Compliant
<p>Refer to evidence in Elements 1.1 and 2.2.</p> <p>VETtrak report: The Centre Manager monitors enrolments and nominal hours to gauge how the RTO is operating, based on funding and individual cohorts. It is broken down according to various funding revenue sources and assists to identify where the RTO should focus its attentions to improve services and operations.</p> <p>Operational Risk Register – identified risks to the RTO's operations and their possible causes, existing controls in place to mitigate the risks and recommended actions to mitigate the risks further; these included changes to procedure manuals to ensure their relevance to the RTO's operations, training of staff in wellbeing issues to assist in student engagement and wellbeing, alterations to the building to ensure sufficient space for delivery of the timetable, maintaining small class sizes to improve student outcomes and develop a supportive environment.</p> <p>Internal audits – annual reports dated 06/2022, 04/2024, were completed over a period of time; reviewed the RTO's operations against the Standards for Registered Training Organisations 2015. The 2024 report highlighted several areas that required addressing and were consistent with this report; for example, validation.</p> <p>Internal audit schedule: for 2020, identified the qualifications, their resources, assessments and mapping to be reviewed each month.</p> <p>Management Committee reports: report on the ongoing operations of the RTO for the purpose of accountability financially and operationally.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: the Committee of Management provides suggestions that the RTO can implement at its discretion. The committee allows the RTO to operate fairly autonomously.</p>	
Improvement Opportunities	

It is recommended that the internal audits be conducted against the AQTF and Victorian Guidelines as the Standards for RTOs 2015 do not include all requirements for VRQA regulated RTOs.

3.3 - The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.

Not audited

Email dated 24/05/2024 from Leanne Shannon-Kelson, Centre Manager, confirmed the RTO does not use third parties.

3.4 - The RTO manages records to ensure their accuracy and integrity.

Non-Compliant

Trainer File Audit Checklist: at the top of each trainer file ensured presence of documentation for each trainer.

Student Folder Checklist: contained in student files contained identification of all enrolment documentation, student file creation requirements and withdrawal information (when applicable). There is provision for 'Audited by (Name & Signature)' to be completed for the purpose of reviewing contents of the file. This had been completed for some files reviewed at audit relevant to Element 1.5, however inaccuracies were present. Refer to findings for Element 1.5.

De-Anna Rullo advised: quality assurance of assessment records has concentrated on completion of responses, not accuracy of responses provided by students. A staff member was responsible for this task up to two years ago. It appears to the Auditor, based on evidence at audit, it has been completed on an ad hoc basis since.

E10 Student Records Policy: outlined the procedures for maintenance of students records, page 58 specifies the requirement for quality records stating, 'ensure that student results accurately reflect achievement against the documented assessment criteria'.

VETtrak Client Enrolment Report: confirmed completion of all units for the qualification for each student.

SF.3.4.1 Finding

Required Rectification(s)

The RTO has not managed records to ensure their accuracy and integrity.
Assessment records are not accurate. Refer to findings in Element 1.5 for detail.

Refer to required rectification for Element 1.5.

Detailed Findings – 2016 VRQA Guidelines for VET Providers

GUIDELINE 1.1 - An RTO must ensure that it has a current strategic plan and a detailed business plan which have been approved by its governing body.

**Not Audited in
Phase 2 audit**

- a) An RTO ensures the strategic plan details the overall vision, mission, board of directors and strategic directions of the RTO and clearly indicates that provision of vocational education is a primary purpose of the RTO.
- b) An RTO ensures the business plan details the operational and workforce development arrangements for a three year period that incorporates:
 - i. description of the business including an organisation chart, courses, location(s) and facilities
 - ii. a continuous improvement plan or risk management strategy
 - iii. a work force development plan
 - iv. strategic alliances with other education or service providers or third party arrangements
 - v. training and assessment delivery including proposed facilities and delivery hours

GUIDELINE 1.2 - An RTO demonstrates its financial viability and its capacity to sustain quality VET into the future by ensuring it has a three year financial plan that includes:

**Not audited in
Phase 2 audit**

- a) projected student enrolments by qualifications
- b) a range of financial indicators, including
 - i. cash flow
 - ii. current ratio of total current assets versus total current liabilities (equal to or greater than 1)
 - iii. debt ratio Total Liabilities/Total Assets (equal to or less than 1)
- c) the VET provider shows that it has a financial guarantor with the capacity to service the guarantee and/or to demonstrate sufficient working capital to operate for at least 6 months without tuition fees.
- d) details about whether any person involved in the management or provision of courses by the RTO meets any of the descriptions listed in section 4.3.11(2) of the Act.

GUIDELINE 1.3 - An RTO ensures that it has management systems that include:

- a) management information including:
 - I. details of company incorporation in Australia (alternatively evidence of being an incorporated body in receipt of government funds)
 - II. a physical address of the company in Victoria for the purposes of serving notices
 - III. details of the directors, CEO/PEO and senior management members/high managerial agents with associated police checks and Working With Children Checks if students are under 18 years of age
 - IV. fit and proper persons declarations for CEO/PEO and all senior management members/high managerial agents, that are conducted prior to employment and fit and proper status is confirmed annually
 - V. confirmation that at least one Director or CEO/PEO has his/her principal residence in Victoria
 - VI. contact arrangements for the CEO/PEO including during holidays and other closure periods
 - VII. a physical addresses for the location of financial, student and staff records including archives and computer back up storage
- b) a financial management system including a system for managing student fee payments and student refunds
- c) a student records management system that includes the capacity to provide the VRQA with AVETMISS compliant data and to ensure that copies of student records are
 - I. not able to be withheld from the RTO; and
 - II. able to be provided in electronic and print versions, at no cost to the VRQA in the event that the VET provider ceases operations
- d) a staff records management system including arrangements which ensure that for each staff member involved in training and assessment, the RTO holds verified documentation indicating each staff member's qualification and skills.

**Not Audited in
Phase 2 audit**

<p>GUIDELINE 1.4 - An RTO ensures that it has appropriate governance structures that includes:</p> <ul style="list-style-type: none"> a) transparent governance and ownership arrangements, such as a Board of Directors, governing council, executive management and academic management b) a governance structure that includes appropriate appointments of persons for oversight of academic/educational integrity and quality assurance, such that: <ul style="list-style-type: none"> i. for an RTO with anticipated ongoing operation of less than 150 equivalent full time students or an annual student fee turnover of less than \$1.5m per annum, persons are appointed with suitable qualifications and experience; and ii. for all other RTOs, a governance committee is established that includes individuals who are independent of the RTO's ownership and are employed with suitable qualifications and experience c) a CEO/PEO and members of the RTO's senior management team with appropriate qualifications and educational experience. 	<p>Not audited in Phase 2 audit</p>
<p>GUIDELINE 2.1 - An RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.</p> <ul style="list-style-type: none"> • A <i>third party</i> means any party that provides services on behalf of the RTO but does not include a party to a contract of employment with the RTO. • <i>Services</i> mean training, assessment, related educational or support services and/or any activities related to the recruitment of prospective students, but does not include student counselling, mediation or ICT support services. 	<p>Not Audited</p>
<p>GUIDELINE 2.2 – An RTO ensures that any third party delivering services on its behalf is required, under a written agreement, to cooperate with the VRQA:</p> <ul style="list-style-type: none"> a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and b) for the purposes of the conduct of any audit or monitoring of its operations. 	<p>Not Audited</p>

<p>GUIDELINE 2.3 – An RTO notifies the VRQA of any written agreement entered into under Guideline 2.2 for the delivery of services on its behalf:</p> <ul style="list-style-type: none"> a) within 30 calendar days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and b) within 30 calendar days of the agreement coming to an end. 	Not Audited
<p>GUIDELINE 2.4 – Information, whether disseminated directly by an RTO or by another party on its behalf, is both accurate and factual, including by:</p> <ul style="list-style-type: none"> a) clarifying whether a third party is recruiting prospective students for an RTO on its behalf; and b) distinguishing 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. 	Not Audited
<p>GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO t provides, in print or through referral to an electronic copy, current and accurate information that:</p> <ul style="list-style-type: none"> a) enables the student to make informed decisions about undertaking training with the RTO and b) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf 	Not Audited
<p>GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, including in relation to any relevant changes to existing or new third party arrangements or changes in ownership.</p>	Not Audited
<p>GUIDELINE 2.7 - An RTO has a complaints policy to manage and respond to allegations involving the conduct of:</p> <ul style="list-style-type: none"> a) the RTO, its trainers, assessors or other staff; b) a third party providing services on the RTO's behalf, its trainers, assessors or other staff; or c) a student of the RTO. 	Not Audited
<p>GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, made by an RTO or a third party providing services on the RTO's behalf.</p>	Not Audited

<p>GUIDELINE 3.1 In addition to the requirements specified in Guidelines 3.2 and 3.3, an RTO's training and assessment is only delivered only by persons who have:</p> <ul style="list-style-type: none"> 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. <p>Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.</p>	Compliant
<p>Refer to evidence for Element 1.4.</p>	
<p>GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.</p>	Compliant
<p>Refer to evidence for Element 1.4.</p>	
<p>GUIDELINE 3.3 Where a person conducts assessment only, an RTO ensures that the person has the qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1 of these Guidelines.</p>	Not Audited
<p>Ms Leanne Shannon-Kelson, Centre Manager, advised: the RTO does not conduct 'assessment only' assessment.</p>	

<p>GUIDELINE 3.4 Where the RTO, in delivering training and assessment, engages an individual who is not a qualified trainer and/or assessor, the individual works under the supervision of a qualified trainer and/or assessor and must not determine assessment outcomes.</p>	<p>Compliant</p>
<p>CHC33021 Certificate III in Individual Support Rebecca McMahon</p> <p>The TAS listed Rebecca McMahon (under supervision) as a Trainer.</p> <p>Supervision Agreement for Rebecca McMahon dated 22/01/2024 detailed the following:</p> <ul style="list-style-type: none"> • The units and dates the supervised trainer (trainer) will deliver, the supervising trainer's (supervisor) duties including documentation of progress, support and guidance and the requirement to assess with the supervised trainer. • The trainer's responsibilities; working under direction of the supervisor, meet regularly with the supervisor and document progress and outcomes. <p>Supervision Meeting Details: not dated, discussed the block of units the trainer delivered and discussions had with students during class.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager: explained that assessment occurs during school holidays when the supervising trainer can attend to sign off on assessment evidence.</p>	

<p>Improvement Opportunities</p>
<p>It is recommended the RTO ensure the Supervision Meeting Details form is used to record observations and constructive feedback by the Supervisor.</p> <p>At present it does not ask the Trainer to record any self-reflection on their performance, identify what went well or not well and what they believe they could improve upon and how.</p> <p>In addition, it should include feedback and recommendations from the supervisor and any future actions to follow up at the next meeting</p>

<p>GUIDELINE 3.5 An RTO ensures that any individual working under the supervision of a trainer:</p> <ul style="list-style-type: none">a) holds the skill set defined in Item 4 of Schedule 1 of these Guidelines, that is relevant to the learner cohort which the individual is involved in training and assessing, or is actively working towards a training and assessment credential specified in Item 1 of Schedule 1;b) has vocational competencies at least to the level being delivered and assessed; andc) has current industry skills directly relevant to the training and assessment being provided.	<p>Compliant</p>
<p>Refer to evidence for Element 1.4.</p>	

GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.		Non-Compliant
Refer to evidence for Element 1.2.		
GF 4.1.1	Finding	Required Rectification(s)
	The RTO's assessment strategies are not consistent with their respective training packages and do not enable each student to meet the requirements for each unit of competency in which the student is enrolled. TAS' did not include details of when assessment will occur throughout the courses.	Refer to required rectifications for Element 1.5.
GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:		Compliant
<ul style="list-style-type: none"> a) the existing skills, knowledge and the experience of the student; 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. 		
Refer to evidence for Element 1.4.		
GUIDELINE 4.3 - From 1 January 2016, to deliver any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor), an RTO must have undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with the requirements contained in Schedule 2 (and the definitions of independent validation and validation) of these Guidelines.		Not Audited
GUIDELINE 4.4 - From 1 January 2016, to deliver any AQF qualification or skill set from the Training and Education Training Package (or its successor), an RTO ensures that all trainers and assessors delivering the training and assessment hold the training and assessment qualification at least to the level being delivered, or have demonstrated equivalence of competencies.		Not Audited

<p>GUIDELINE 4.5 - From 1 January 2017, to deliver the training and assessment qualification specified in Item 1 of Schedule 1 of these Guidelines, or any assessor skill set from the Training and Education Training Package (or its successor), an RTO ensures all trainers and assessors delivering the training and assessment:</p> <ul style="list-style-type: none"> a) hold the qualification specified in Item 5 of Schedule 1 of these Guidelines; or b) work under the supervision of a trainer that holds the qualification specified in Item 5 of Schedule 1 of these Guidelines. 	Not Audited
<p>GUIDELINE 4.6 - An RTO ensures that any individual working under supervision holds the qualification specified in Item 1 of Schedule 1 of these Guidelines and does not determine assessment outcomes.</p>	Not Audited
<p>GUIDELINE 4.7 - An application to add any AQF qualification or assessor skill set from the Training and Education Training Package (or its successor) to an RTO's scope of registration has only be granted if an RTO has:</p> <ul style="list-style-type: none"> a) held registration for at least two years continuously at the time of adding the qualification and/or skill set to scope; and b) from 1 January 2016, undergone an independent validation of its assessment system, tools, processes and outcomes in accordance with Guideline 4.3. 	Not audited
<p>GUIDELINE 5.1 - An RTO registered with the VRQA has provided an annual declaration of compliance with the AQTF Essential Conditions and Standards for Continuing Registration (the AQTF Standards) and these Guidelines, and in particular whether it:</p> <ul style="list-style-type: none"> a) currently meets the requirements of the AQTF Standards and these Guidelines across all of its existing scope of registration; and b) has met the requirements of the AQTF Standards for all AQF certification documentation which it has issued in the previous 12 months; and c) has training and assessment strategies and practices in place that ensure that all current and prospective students are or will be trained and assessed in accordance with the requirements of the AQTF Standards and these Guidelines. d) Currently meets the requirements of Guideline 6 (Child Safe Standards), if applicable 	Not audited

GUIDELINE 6.1 - Organisations establish a culturally safe environment in which the diverse and unique identities and experiences of Aboriginal children and young people are respected and valued		Non-Compliant
<p>Policy E32 Child Safe Policy: page one stated ‘Aboriginal and Torres Strait Islander children must have their culture acknowledged and identified. All Murray ACE staff are trained in the culture of Aboriginal and Torres Strait Islander people’ and ‘Aboriginal people hold distinct rights and must not be denied the right to enjoy their identity and culture, to maintain their kinship ties and to maintain their distinctive spiritual, material, and economic relationship with the land and waters with which they have connection under traditional laws and customs. Keeping young people connected to their communities and strong in their identity and culture is essential to their wellbeing and the cornerstone of resilience’.</p> <p>Evidence of promotion of Aboriginal culture: Aboriginal art is displayed through the centre and a ‘welcome to country’ plaque is at the front door.</p> <p>De Anna Rullo, Training Coordinator and Reconnect Case Worker, advised: the RTO liaises with Mallee District Aboriginal Service (MDAS); the Hairdressing and Beauty students attend their pamper days twice a year to provide beauty services to staff and Aboriginal clients. MDAS have a community day and the RTO sends students and trainers down if available.</p> <p>Certificate of Appreciation from MDAS; to the RTO for their support towards MDAS.</p> <p>Early Child Care – Kunawaa Kindergarten, the Early Child Care students do a tour. A trainee has commenced with the RTO from the same kindergarten.</p> <p>Clontarf Foundation: an indigenous foundation, for all of the Indigenous boys in schools to teach them about family, keeping healthy, football orientated. The boys come to the RTO for haircuts and the RTO assists the students in providing free stationary at the beginning of the school year.</p> <p>2023 Clontarf Acknowledgement to Country V2: is a professionally produced ‘welcome to country’ video in conjunction with the RTO and the Clontarf Foundation for use by the RTO.</p> <p>NAIDOC week is celebrated and NAIDOC day is attended by staff.</p> <p>Swan Hill Settlement Network (SHSN) – De Anna Rullo attends the monthly meeting to discuss all matters relating to immigrants to the region. Planning for an influx of up to 2400 new migrants to settle in the region.</p>		
GF 6.1	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that it:</p> <ul style="list-style-type: none"> • has a professional development plan for staff and volunteers relating to Aboriginal culture • has consulted with local Aboriginal organisation(s) to inform its culturally safe practices • has processes that support the participation of Aboriginal children and their families. 	<p>The RTO is required to implement the following rectification actions:</p> <ul style="list-style-type: none"> • Develop a professional development plan for staff and volunteers relating to Aboriginal culture.

	<ul style="list-style-type: none"> • Consult with local Aboriginal organisations to inform its culturally safe practices. • Develop processes that support the participation of Aboriginal children and their families.
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GUIDELINE 6.2 - Child safety and wellbeing is embedded in organisational leadership, governance and culture	Non-Compliant
<p>Policy E32 Child Safe Policy: listed the Centre Manager or the Training Coordinator as the point of contact for Child Safe Standard concerns.</p> <p>Murray ACE - Swan Hill Learning Centre (macesh.vic.edu.au): the RTO's website, viewed 06/06/2024; did not contain access to the RTO's Child Safe policy or a public statement related to child safety.</p> <p>Policy E31 Child Safety Code of Conduct: outlined the behaviours to be exhibited by staff for the purpose of ensuring child safe practises at the RTO.</p> <p>Student Information Guide: contained a Code of Conduct for staff, trainers and students that requires respectful behaviour and cultural respect for each other's differences.</p> <p>Policy E32 Child Safe Policy: has not been endorsed by the Committee of Management; it has been signed by Anne Murray, Training Coordinator and Compliance Officer on 15/02/2023.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: the CSS policy is taken to the Committee of Management for discussion. The RTO needs to do some more work on it before presenting it to the Committee. It was discussed last year but final approval on implementation has not occurred.</p> <p>Information Pack for Board Nominees: included information on 'expectations of Board members' that includes maintaining confidentiality,</p> <p>Induction Pack for staff: did not contain reference to child safety and wellbeing.</p> <p>Trainer Handbook: included information relating to confidentiality and the maintenance and retainment of student records on the premises.</p> <p>Confidentiality Agreement: is signed by new staff of the RTO on engagement.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: as part of the enrolment process, the trainers are advised of students under 18 years of age.</p>	
GF 6.2	Finding
Required Rectification(s)	

<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> • it has a publicly available child safety statement • it has evidence demonstrating that the governing body has oversight of child safe policy and procedure implementation • it has a Code of Conduct that includes volunteers and visitors • its documented process identifies and manages risks to child safety that is subject to oversight of the governing body • it has a process for informing volunteers of young people that are enrolled. 	<p>The RTO is required to implement the following rectification actions:</p> <ul style="list-style-type: none"> • Ensure its child safety statement is publicly available. • Maintain evidence demonstrating that the governing body has oversight of child safe policy and procedure implementation. • Amend the Code of Conduct to include volunteers and visitors. • Develop and implement a documented process that identifies and manages risks to child safety that is subject to oversight of the governing body. • Develop and implement a process for informing volunteers of young people that are enrolled.
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<p>GUIDELINE 6.3 - Children and young people are empowered about their rights, participate in decisions affecting them and are taken seriously</p>	<p>Non-Compliant</p>
<p>Enrolment papers: require the parent or guardian to sign the enrolment papers before a child can commence study with the RTO.</p> <p>Student Information Guide: page six included 'Murray ACE is committed to cultural safety of Aboriginal, Torres Strait Islanders, and all others from culturally and linguistically diverse backgrounds'. There was no further information related to Child Safety.</p> <p>Child Safe Standards Posters are present in the toilets and common room of the RTO for students to read.</p> <p>VicSport Child Safety Training: provided by Mallee Sports Assembly; conducted a Child Safe Standards Workshop on 04/04/2024, attended by De-Anna Rullo, Training Coordinator.</p> <p>De-Anna Rullo and Leanne Shannon-Kelson advised: staff undertook PD in a trainers meeting. The slideshow consisted of the Department of Education's Child Safety Standards presentation.</p>	

Child Safe Standards School Staff Training PowerPoint presentation: downloaded from the Victorian government website for the purpose of educating staff in Child Safety obligations.		
GF 6.3	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> volunteers are trained to recognise signs of child harm access to sexual abuse prevention programs is provided to students. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> it has implemented a process to train volunteers on how to recognise signs of child harm sexual abuse prevention programs have been provided to students.

GUIDELINE 6.4 - Families and communities are informed, and involved in promoting child safety and wellbeing		Non-Compliant
<p>Enrolment papers: require the parent or guardian to sign the enrolment papers before a child can commence study with the RTO.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: if there are any issues relating to VETis students behaviour, an email is sent to their school for the school to deal with it. There have been no issues to date regarding plagiarism/failing subjects.</p>		
GF 6.4	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> child safe policies and procedures are accessible to young students' families, carers, and the communities that represent them there is consultation with students' families and communities that represent students during the development and continuous improvement of child safe policies and practices. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> its child safe policies and procedures are accessible to young students' families, carers, and the communities that represent them there is consultation with students' families and communities that represent students during the development and continuous improvement of child safe policies and practices.
Improvement Opportunities		

It is recommended the RTO:

- document and implement a process to indicate when parents are consulted
- consider engaging with the schools it enrolls students from to adopt (or partner with in) similar practises for this and other CSS Guidelines.

GUIDELINE 6.5 - Equity is upheld and diverse needs respected in policy and practice		Non-Compliant
<p>Policy E32 Child Safe Policy: acknowledged peoples diverse circumstances and obligations for support and provision of a safe environment.</p> <p>E13 Duty of Care Policy: included the obligations of responding to the safety and wellbeing of all staff, members and students regardless of their gender...or social background have the right to be treated equally’.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: there was no further evidence for this guideline.</p>		
GF 6.5	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> • RTO policies and procedures are accessible to its young people • RTO policies and procedures include mechanisms for a student voice that ensure students feel supported and confident to speak up • professional development plans include training on the needs of CALD, LGBTQIA+, and young people in out-of-home care • the RTO Code of Conduct ensures equity of CALD, LGBTQIA+, and young people in out-of-home care • the RTO has implemented measures that identify and address racism. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> • RTO policies and procedures are accessible to its young people • RTO policies and procedures include mechanisms for a student voice that ensure students feel supported and confident to speak up • professional development plans include training on the needs of CALD, LGBTQIA+, and young people in out-of-home care • the RTO Code of Conduct ensures equity of CALD, LGBTQIA+, and young people in out-of-home care

	<ul style="list-style-type: none"> the RTO has implemented measures that identify and address racism.
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GUIDELINE 6.6 - People working with children and young people are suitable and supported to reflect child safety and wellbeing values in practice		Non-Compliant
<p>Staff files reviewed at audit: included Criminal History Checks and WWCC checks in place.</p> <p>Staff folders contained a checklist regarding renewal of WWCC.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised:</p> <ul style="list-style-type: none"> she makes a phone call to referees during the recruitment process. There are no questions relevant to child safety. the WWCC checklist is checked when performance appraisals are conducted annually. Staff files sighted at audit confirmed this practise staff are given an induction pack on employment that includes a copy of the Child Safe Standards. They are provided access to the RTOs policies and procedures. <p>List of referee questions: asked the referee how long they have known the candidate, describe their reliability and punctuality, strengths and weaknesses, if they would recommend the candidate and provides opportunity for the referee to provide any further information. It did not include any questions relating to child safety.</p>		
GF 6.6	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> staff/volunteer onboarding informs them of Child Safe Standards (CSS) policies and procedures, including the code of conduct and reporting requirements documented management processes include oversight of CSS expectations for all staff and volunteers management processes include specific mention of CSS and be a documented part of staff reviews and conduct processes. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> staff/volunteer onboarding informs them of CSS policies and procedures, including the code of conduct and reporting requirements documented management processes include oversight of CSS expectations for all staff and volunteers management processes include specific mention of CSS and be a documented part of staff reviews and conduct processes.

GUIDELINE 6.7 - Processes for complaints and concerns are child focused		Non-Compliant
<p>E20 Student Assessment Appeals policy: the policy for governing responses to student appeals and complaints. The policy did not include the different types of complaints, roles and responsibilities of leadership, staff and volunteers and did not reference breaches in policies or Code of Conduct. Ms Leanne Shannon-Kelson, Centre Manager, advised: there was no further evidence to present for this Guideline.</p>		
GF 6.7	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that its complaints policy:</p> <ul style="list-style-type: none"> • specifies that complaints can be raised in instances where leadership, staff, volunteers, students, and others engaged in RTO operations breach policies and procedures, including the code of conduct and obligations to act • responds with appropriate urgency based on the nature of the complaint, including managing risk to children while a complaint is investigated • stipulates escalated reporting requirements and the RTO co-operates with law enforcement when necessary • sets out how students will be supported • is available to staff and young students and their families • meets relevant legislative requirements (reporting, privacy, and employment law). 	<p>The RTO is required to provide evidence that its complaints policy:</p> <ul style="list-style-type: none"> • specifies that complaints can be raised in instances where leadership, staff, volunteers, students, and others engaged in RTO operations breach policies and procedures, including the code of conduct and obligations to act • responds with appropriate urgency based on the nature of the complaint, including managing risk to children while a complaint is investigated • stipulates escalated reporting requirements and the RTO co-operates with law enforcement when necessary • sets out how students will be supported • is available to staff and young students and their families • meets relevant legislative requirements (reporting, privacy, and employment law).

GUIDELINE 6.8 - Staff and volunteers are equipped with the knowledge, skills and awareness to keep children and young people safe through ongoing education and training		Non-Compliant
<p>De-Anna Rullo, Training Coordinator: demonstrated: the PowerPoint presentation (from the Department of Education Victoria) that was implemented to train the staff in the CSS requirements.</p> <p>Child Safety Standards training attendance list: for CSS training conducted 15/05/2024.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, and De-Anna Rullo, Training Coordinator advised: there were no training plans in place.</p>		
GF 6.8	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> a professional development plan in place for ongoing training on recognising and responding to child safety issues, and supporting those that disclose harm. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> it has a professional development plan in place for ongoing training on recognising and responding to child safety issues, and supporting those that disclose harm.

GUIDELINE 6.9 - Physical and online environments promote safety and wellbeing while minimising the opportunity for children and young people to be harmed		Non-Compliant
<p>De-Anna Rullo, Training Coordinator, advised: monitoring of students is conducted by the trainers during class. There is no monitoring of students whilst in the common areas.</p> <p>Ms Leanne Shannon-Kelson, Centre Manager, advised: underage students must have permission from their parents if they wish to leave the building during the day.</p> <p>Operational Risk Register – identified risks to the RTO’s operations and their possible causes, existing controls in place to mitigate the risks and recommended actions to mitigate the risks further; these included changes to procedure manuals to ensure their relevance to the RTO’s operations, training of staff in wellbeing issues to assist in student engagement and wellbeing, alterations to the building to ensure sufficient space for delivery of the timetable, maintaining small class sizes to improve student outcomes and develop a supportive environment.</p>		
GF 6.9	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p>	<p>The RTO is required to provide evidence that:</p>

<ul style="list-style-type: none"> its Operational Risk Register considers all of the physical environment and activities undertaken in the classroom and common areas relevant to CSS it has a process for monitoring online and physical interactions during training it has a code of conduct that applies to online environments. 	<ul style="list-style-type: none"> its Operational Risk Register considers all of the physical environment and activities undertaken in the classroom and common areas relevant to CSS it has a process for monitoring online and physical interactions during training it has a code of conduct that applies to online environments.
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GUIDELINE 6.10 - Implementation of the Child Safe Standards is regularly reviewed and improved		Non-Compliant
Ms Leanne Shannon-Kelson, Centre Manager, advised: there was no further evidence to present for this Guideline.		
GF 6.10	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> child safe practices are included in continuous improvement practices its continuous improvement process includes regular reviews of child safety, and issues are addressed. continuous improvement processes outline how it will report child safety review findings to staff, volunteers, its student body and their families and communities. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> child safe practices are included in continuous improvement practices its continuous improvement process includes regular reviews of child safety, and issues are addressed continuous improvement processes outline how it will report child safety review findings to staff, volunteers, its student body and their families and communities.

GUIDELINE 6.11 - Policies and procedures document how the organisation is safe for children and young people		Non-Compliant
<p>Policies are in place (as referenced throughout this report) but do not address all of the Child Safe Standards. Ms Leanne Shannon-Kelson, Centre Manager, advised: there was no further evidence to present for this Guideline. Training is provided to staff; refer to Guideline 6.8 for detail.</p>		
GF 6.11	Finding	Required Rectification(s)
	<p>The RTO has not demonstrated that:</p> <ul style="list-style-type: none"> • it has documented policies and procedures in place that address all the Child Safe Standards • development and continuous improvement of child safe policies, procedures, and practices is informed by professional development, research, and/or consultation • it has a process in place to verify that staff and volunteers understand and are implementing child safety practices. 	<p>The RTO is required to provide evidence that:</p> <ul style="list-style-type: none"> • it has documented policies and procedures in place that address all the Child Safe Standards • development and continuous improvement of child safe policies, procedures, and practices is informed by professional development, research, and/or consultation • it has a process in place to verify that staff and volunteers understand and are implementing child safety practices.