



REPORT

Audit report: Skill Hire WA Pty Ltd

Date/s of audit: 14 November 2017

Date report created: 22/11/2017

Date report updated: 7/03/2018

Organisation details

Organisation's legal name:	Skill Hire WA Pty Ltd
Trading name/s:	Business Leadership Centre, Skill Hire WA
RTO number:	0361
CRICOS number:	N/A

Audit team

Lead auditor:	Rhonda Hoyle
Assistant/s:	Nil

Audit details

Application number/s:	N/A	
Audit number:	AUDREC0000299	
Audit reason	Compliance - monitoring	
Address of site/s visited:	271 Berkshire Rd FORRESTFIELD WA 6058	
Date/s of audit:	15/11/2017	
Organisation's contact for audit:	Mr Donald McKenzie donaldm@skillhire.com.au	CEO (08) 9376 2800

Original finding at time of audit

Audit finding: Serious non-compliance

Report completed by: Rhonda Hoyle

Practice	Standards for RTOs 2015	Finding
Marketing/Recruitment	4.1	Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	Not audited
Support and Progression	1.7	Compliant
Training and Assessment	1.1, 1.2, 1.8	Not compliant
	1.3, 1.13 – 1.18, 1.20	Compliant
Completion	3.1	Not compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	Not audited

Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 7/03/2018 : Compliant

Report completed by: Cherrie Hawke

Practice	Standards for RTOs 2015	Finding
Marketing/Recruitment	4.1	Not audited
Enrolment	5.1, 5.2, 5.3, 7.3	Not audited
Support and Progression	1.7	Not audited
Training and Assessment	1.1, 1.2, 1.8	Compliant
	1.3, 1.13 – 1.18, 1.20	Not audited
Completion	3.1	Compliant
Regulatory Compliance/Governance	2.3, 2.4, 8.2	Not audited

Background

Skill Hire WA Pty Ltd was initially registered as an RTO with TAC (WA) on 13 June 1996 with a focus of training and assessment mainly in traineeships within construction.

In 2015 the RTO initially applied unsuccessfully to add 10 x BSB qualifications to their scope of registration to be delivered and assessed online at their then new training facility located in Bunbury (WA) – The “Business Learning Centre (BLC)” (Audit No: 1009017).

28 & 29 January 2016 A site audit was conducted and the RTO was found to be not compliant with clauses 1.1, 1.4, 1.8 and 2.1. The RTO provided rectification and remained not compliant with clauses 1.4, 1.8 and 2.1. The commissioner rejected the RTO’s applications for the 10 x BSB qualifications on 15 April 2016.

Following reconsideration, the RTO’s application to add 10 BSB qualifications to their scope of registration was approved by the Chief Commissioner on 28 June 2016 with a compliance monitoring audit to be conducted nominally within 12 months to assess that rectification effort has been implemented across the RTO’s operations and scope of registration, particularly with a focus on the quality of its training and assessment practices.

The following information was provided by the organisation prior to and during the audit process.

In 2017, the RTO relocated the BLC services to be co-located with the rest of the RTO and with Nara Training and Assessing Pty Ltd at 271 Berkshire Rd, FORRESTFIELD WA 6058.

Significant associates:

- In June 2014 the owners of Skill Hire WA Pty Ltd purchased Nara Training – a current and separate RTO (a TAC regulated RTO).
- Skill Hire WA Pty Ltd established an agreement with Nara Training to deliver some training to gain income for the new Business Leadership Centre (a trading name of Skill Hire WA Pty Ltd).
- There is significant association between Skill Hire WA Pty Ltd and NARA Training – in that both RTOs are owned by Skill Hire WA Pty Ltd which is chaired by a board and both RTOs have the same CEO, CFO and COO.

Current business activities:

- Skill Hire WA Pty Ltd focuses on HRWL/Construction.
- The BLC arm of delivery focuses on corporate/professional development/business/leadership environment and qualifications.

Staff/Trainers:

Perth/Kewdale

Skill Hire WA Pty Ltd /BLC - the RTO has 4 trainers (incl Compliance Manager) and 4 fulltime staff located in Perth/Kewdale area Scope of registration:

Scope of compliance monitoring audit:

- BSB30215 Certificate III in Customer Engagement
- BSB30715 Certificate III in Work Health and Safety
- BSB40315 Certificate IV in Customer Engagement
- BSB40515 Certificate IV in Business Administration
- BSB41415 Certificate IV in Work Health and Safety
- BSB41515 Certificate IV in Project Management Practice
- BSB42015 Certificate IV in Leadership and Management
- BSB51315 Diploma of Work Health and Safety
- BSB51415 Diploma of Project Management
- BSB51915 Diploma of Leadership and Management

Suburb and state of all delivery locations:

- Skill Hire WA relocated the BLC from Bunbury to Forrestfield in 2017 where it is now co-located with the rest of the RTO at: 271 Berkshire Road, Forrestfield WA 6056

Third party usage:

- Skill Hire WA advised that there were no outsourcing arrangements in place for delivery and/or assessment of the BSB qualifications.

Core clients/target groups:

- Skill Hire WA offers these BSB qualifications via the BLC to:
 - support Skill Hire WA and NARA clients including - Recruitment and Training clients including:
 - FMG,
 - Total AMS (Dredging), and
 - Local Shires eg: Bunbury
 - the public, and
 - internal Staff

Training Revenue (Funded or fee for service):

- Skill Hire WA offer all BSB qualifications through the BLC as FFS.
- Skill Hire WA other than for the BSB qualifications referred above offer
 - Fee for Service
 - User choice funding
 - CTF
 - ABBTF (Bricklaying)

Total number of current enrolments for only the 10 BSB qualifications as at audit date (14 November 2017):

- 10 x BSB qualifications = 76 enrolments, and
- BSB Skill Sets = 112 enrolments

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

- Information provided directly by Skill Hire WA Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Skill Hire WA Pty Ltd
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Skill Hire WA Pty Ltd conducted on 14 November 2017.
- Other publically available information - including but not limited to, information published on the organisations and third party websites.

Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
BSB30215	Certificate III in Customer Engagement	Online	7
BSB41415	Certificate IV in Work Health and Safety	Online	16
BSB51915	Diploma of Leadership and Management	Online	27

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

Interviewees

Name	Position	Training products
Carly Bradley	Group Manager – Training	Nil
Judy Beeken	Senior Compliance Officer	2 x UOC - Certificate III in Customer Engagement 1 x UOC - Certificate CIV in Customer Engagement
Krystal Robinson	Program Coordinator	Nil

About this Report

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

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

Correcting a non-compliance may require:

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

Original Action required by RTO

Skill Hire WA Pty Ltd did not meet all requirements for clauses: 1.1, 1.2, 1.8 and 3.1

Remedial action is required for the following training products:

- **BSB30215 Certificate III in Customer Engagement**
 - *BSBWOR203 Work effectively with others*
- **BSB40515 Certificate IV in Work Health and Safety**
 - *BSBWHS405 Contribute to implementing and maintaining WHS management systems*
 - *BSBPMG522 Undertake project work*
- **BSB51915 Diploma of Leadership and Management**
 - *BSBWOR502 Lead and manage team effectiveness*
 - *BSBPMG522 Undertake project work*

The RTO is required to provide evidence that demonstrates:

Training and assessment

Clauses 1.1 and 1.2

- Provide evidence that:
 - The RTO has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided.
 - The RTO carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled that were impacted by training and assessment practices that did not meet the requirements of the training product (including amount of training). Remedial action needs to cover current students and students who enrolled or completed with your training provider in the past 3 months.

Clause 1.8

- Provide evidence that:
 - The RTO has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied.
 - The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all BSB Business Services Training Packages currently on scope that were assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action needs to cover current students and students who were assessed by your training provider in the past 3 months.

Completion

Clause 3.1

- Provide evidence:
 - The RTO now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training.
 - The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all BSB Business Services Training Packages currently on scope that were issued with AQF certification documentation and were not assessed as meeting the requirements of the training product as specified in the

relevant training. Remedial action needs to cover students issued with AQF certification in the past 3 months.

Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by Skill Hire WA Pty Ltd on 7/03/2018, the RTO:

- provided sufficient evidence to demonstrate compliance with clauses 1.1, 1.2, 1.8 and 3.1.

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

Areas of non-compliance

Training and Assessment

Standards for RTOs Clause 1.1

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

Standards for RTOs Clause 1.2

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

- a) the existing skills, knowledge and the experience of the learner;
- b) the mode of delivery; and
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

Findings: Not compliant

Evidence reviewed

- Training and Assessment Strategies
- RTO Website
- Assessment and judgement tools for the audit sample reviewed under clause 1.8
- Completed student assessment records reviewed at clause 3.1 (5)

BSB30215 Certificate III in Customer Engagement

BSB40515 Certificate IV in Work Health and Safety

BSB51915 Diploma of Leadership and Management

- The RTO's training and assessment practices are not compliant with the requirements of the Standards for RTOs 2015 as they do not enable each learner to meet all requirements of the training products in which they are enrolled. For example, but not limited to:
 - The RTO's training and assessment strategies and practices, including the amount of training provided, are not internally consistent and are not consistent with the requirements of the training package,
 - The strategies do not provide a framework to guide the learning requirements and the training and assessment arrangements of each training product - at the macro level requirements of the learning and assessment process.
 - The RTO provided no rationale to support the qualification being offered in a timeframe that is inconsistent with the recommended AQF volume of learning, and how the amount of training was determined with regard to the existing skills, knowledge and the experience of the learners and the mode of delivery.

Examples of non-compliant practice include: but not limited to:

BSB40515 Certificate IV in Work Health and Safety

- The strategy contains inconsistent information regarding the course deliver methods, modes and locations. For example but not limited to:

- Page 5 – “9. Course Delivery”

“9.1 Environment and Facilities” states:

“The environment where the qualification will be delivered includes: Online”,

Page 7 - “9.5 Mode of Delivery” states: “Delivery will mainly be: Online”

Pages 7/8 – “10. Course Structure And Delivery Plan” states: “DELIVERY MODE LMS” for all units.

However,

Page 4 – “8. Risk Assessment”, “8.2. Risk management strategies” states:

“Due to the nature of the units in customer engagement there is a requirement for a practical component to be completed in a workplace setting.” ,

Page 6 – “9.3 – Amount of Training” states:

Participants will have 12 months to complete the course this includes the following aspects”:

“Up to 480 hours in the workplace (research, transfer of knowledge)”

Page 10 – “18.1 Assessment Methodology Legend” States

“The assessment methodologies used for this qualification and target group are as follows:

A Activities...”, B Questions ...”, and “ Workplace Project (Summative) [Performance Evidence]”.

- The strategy do not provide a framework to guide the learning requirements and the training and assessment arrangements of each training product - at the macro level requirements of the learning and assessment process. For example but not limited to:

- Page 7 – “10. Course Structure and Delivery Plan”

The 1st column headed “**TIMEFRAME**” does not contain information regarding the course or unit delivery and/or assessment timeframes. The column contains the words “Block” 1, 2, 3, 4 etc with no actual reference to a course or unit timeframe and/or duration.

BSB30215 Certificate III in Customer Engagement

- The RTO did not provide a rationale to demonstrate that they have determined the amount of training being provided with regard to the existing skills, knowledge and experience of the learner. For example, but not limited to:

- Page 8 – “9.3. Amount of Training”

The amount of training listed for this qualification totals - 775 hours however, this amount of training is not consistent with that recommended by the Australian Quality Framework. The AQF recommended volume of learning for a Certificate III is:

- a minimum duration of 1 year to a maximum of 2 years, and
- a minimum number of hours training at 1200 hours and a maximum number of hours training of 2400 hours.

- The strategy does not provide consistent information regarding the course duration and did not provide a framework to guide the learning requirements and the training and assessment arrangements of each training product - at the macro level requirements of the learning and assessment process. For example but not limited to:

- Page 9 – “10. Course Structure and Delivery Plan”

- The 1st column headed “**TIMEFRAME**” contains “4 weeks” in each row for all 12 units. The total of 12 x 4 weeks is 48 weeks.

This information is not consistent with the information at:

- Page 8 – “9.4. Duration of Training” that states:
“The course will be delivered over a 12 month period,…”
- Page 9 – “10. Course Structure and Delivery Plan”
 - The 5th/Last column headed “**ASSESSMENT DATES SET**” states: “**TBC**”

These practices and behaviours are non-compliant with clauses 1.1 and 1.2 of the *Standards for RTOs 2015*

Analysis of additional evidence:

BSB30215 Certificate III in Customer Engagement

BSB41415 Certificate IV in Work Health and Safety

BSB51915 Diploma of Leadership and Management

The following additional evidence was provided:

- Revised Training and Assessment Strategy procedure
- Training and assessment strategy request form
- Professional development provided by Velg, undertaken by trainers and assessors on training and assessment strategy development
- Revised training and assessment strategy for blended delivery of each qualification
- Course Delivery Resource Assessment for each qualification
- Training and assessment strategy industry validation forms
- Process for analysis of student files and action underway to address the impact on students – recorded at Clause 3.1.

The evidence provided has addressed the non-compliance and demonstrates how the RTO is addressing the impact of the non-compliance on students.

Standards for RTOs Clause 1.8

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

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

Findings: Not compliant

Evidence reviewed

- RTO Training and Assessment Strategies (3)
- RTO suite of assessment materials provided for units in audit sample
- Completed student assessment records reviewed at clause 3.1 (5)

BSB30215 Certificate III in Customer Engagement

- *BSBWOR203 Work effectively with others*

BSB40515 Certificate IV in Work Health and Safety

- *BSBWHS405 Contribute to implementing and maintaining WHS management systems*
- *BSBPMG522 Undertake project work*

BSB51915 Diploma of Leadership and Management

- *BSBWOR502 Lead and manage team effectiveness*
- *BSBPMG522 Undertake project work*

- The RTO did not demonstrate that they have implemented an assessment system that ensures that assessment (including recognition of prior learning):
 - a) complies with the assessment requirements of the relevant training package or VET accredited course; and
 - b) is conducted in accordance with the Principles of Assessment and the Rules of Evidence

Examples of noncompliance include:

- The assessment materials and judgement tools do not demonstrate that sufficient evidence is gathered of practical application of the learners required skills and abilities as required of the relevant assessment requirements for each unit of competency and relevant training package. For example, but not limited to:
 - Assessment materials and judgement tools provided do not:
 - meet the performance evidence and knowledge evidence required of each unit of competency in that the assessment tasks and activities do not gather sufficient evidence of the learner's practical application of skills and abilities as required of the relevant units of competency.
 - gather evidence to demonstrate consistent performance as required in the "Assessment Conditions", and
 - provided evidence to demonstrate that the RTO has confirmed the learning workplace conditions, resourcing and context in accordance with the relevant unit of competency and the relevant training package requirements.

BSB40515 Certificate IV in Work Health and Safety

BSBWHS405 Contribute to implementing and maintaining WHS management systems

- The assessment and judgment tools do not gather evidence of the required **Performance Evidence** including "Evidence of the ability to contribute, as appropriate to own job role and work area:
 - planning the Work Health and Safety management system (WHSMS) to incorporate return-to-work and injury management procedures and other elements relevant to the work area
 - communicating and explaining WHS policy and the WHSMS to others to facilitate their contribution in developing, implementing and evaluating the systems
 - implementing the plan
 - evaluating WHS performance and communicating the outcomes
 - reviewing and improving the WHSMS".
- The assessment and judgment tools do not gather evidence of the required **Knowledge Evidence** including "To complete the unit requirements safely and effectively, the individual must:
 - outline the elements of the organisation's WHSMS with reference to the relevant commonwealth and state or territory WHS Acts, regulations, codes of practice and standards.
 - identify regulatory authority WHSMS tools, standards and guidance material and explain how they apply to the work area
 - outline organisational WHS policies, procedures, processes and systems and how they apply to the work area"
- The assessment practices and materials do not demonstrate that the relevant **Assessment Conditions** will be met. For example no evidence to demonstrate that:
 - "evidence gathered demonstrates consistent performance of typical activities experienced in the workplace and include **access to:**
 - office equipment and resources
 - relevant Acts, regulations, codes of practice, standards and guidelines
 - workplace WHS policies and procedures."

- The assessment process and materials provided do not meet the requirements of the principles of assessment for **fairness**. The RTO has not sufficiently demonstrated that they:
 - Consider the learners individual needs in the assessment process and where appropriate, make reasonable adjustments to accommodate the learners in achieving the assessment conditions and performance evidence requirements however, in doing so do not compromise the rigour of the assessment process. For example, but not limited to:
 - Student Instructions
 - **“Summative Assessment 1”, “Knowledge Evidence”**
Learners are not provided instructions or a benchmark regarding the expected responses to the eight (8) questions for example: All assessment materials and tools state: “learners are to complete all tasks, or activities”. The benchmark for all students is not clear eg: a Yes/No, or 200 words, or 1 page response?
 - **“Summative Assessment 2”, “Project 1”**
Learners are not provided with the required context and/or clear instruction for example, but not limited to, what is the context of the workplace scenario provided - what are typical activities experienced in the industry capability - workplace effectiveness, specifically regarding the industry, the workplace or role and responsibilities required of the learner relating to the unit requirements specifically to support the 2 options provided by the RTO eg: within your own workplace (role unknown) or within the scenario provided (role unknown).
 - In addition, there is no evidence that the learners are advised of the relevant assessment requirements requiring the learners to have access to:
 - office equipment and resources
 - relevant Acts, regulations, codes of practice, standards and guidelines
 - workplace WHS policies and procedures
 - Interaction with others.
- The assessment process and materials provided do not meet the requirements of the principles of assessment. For example, using the example unit referred to above, but not limited to the following:
 - The assessment process and materials provided do not demonstrate that the RTO will assess the learners:
 - in a broad range of skills and knowledge that are essential to competent performance
 - by integrating skills and knowledge in a practical application of the units
 - based on evidence that will demonstrate that a learner will demonstrate the skills and knowledge in other similar situations
 - based on evidence of the learners performance that will align to the units of competency and associated assessment requirements.
 - There is no evidence in the RTO's assessment process to demonstrate that the learners are required to demonstrate the practical application of the breadth of skills and knowledge required of the unit.
 - It is unclear how a judgement of the assessments will be made of the learner's oral communication or ability to interact or work with others as the learners are only required to provide written or theorised responses.
 - The assessment process and materials do not provide evidence to demonstrate that the assessor will be assured that the quality, quantity and relevance of the assessment evidence to be gathered, will enable a judgement to be made of the learner's competency.
 - Evidence that the RTO has gathered enough evidence to make a valid judgement of competence or otherwise.
 - Some of the assessment practices used by the RTO will not collect sufficient evidence of the context in which any assessment activity is to be conducted or evidence of the learners consistently demonstrating the required skills and knowledge in a range of contexts over a period of time.

- The assessment process, judgement tools, assessment materials and supporting documentation provided as detailed above do not demonstrate that the RTO's own behaviours and practices are consistent with the RTO having implemented assessment systems and practices that ensure assessment including recognition of prior learning comply with the requirements of the NVR Standards for RTO's 2015 for example, but not limited to:
 - Assessment complies with the assessment requirements of the relevant training package or VET accredited course; and
 - Assessment is conducted in accordance with the Principles of Assessment and the Rules of Evidence including:
 - The Principles of Assessment for **Fairness, Validity**, and **Reliable**, and
 - The Rules of Evidence for **Validity** and **Sufficiency**.

The examples listed above provide guidance on the areas of non-compliance identified and are not a full list of each unit of competency requirements that have not been met and is a representation of the gaps in the assessment tools/material and records reviewed for all units of competency relevant to the scope of the audit. The RTO is responsible for providing evidence that demonstrates all units of competency requirements are met and that their assessment practices are conducted in accordance with the principles of assessment and the rules of evidence.

These practices and behaviours are non-compliant with Clause 1.8 of the *Standards for RTOs 2015*

Analysis of additional evidence:

BSB30215 Certificate III in Customer Engagement

- *BSBWOR203 Work effectively with others*

BSB41415 Certificate IV in Work Health and Safety

- *BSBWHS405 Contribute to implementing and maintaining WHS management systems*
- *BSBPMG522 Undertake project work*

BSB51915 Diploma of Leadership and Management

- *BSBWOR502 Lead and manage team effectiveness*
- *BSBPMG522 Undertake project work*

The following additional evidence was provided:

- Revised training and assessment strategy for each qualification (3)
- Effective Assessment Procedure
- Revised assessment materials for units in audit sample:
 - Assessor tools (4)
 - Mapping Guides (4)
 - Assessment validation reports (8)
- Performance evidence assessment instruments to record practical assessment and competency conversations (for 8 units)
- Process for analysis of student files and action underway to address the impact on students – recorded at Clause 3.1.

The evidence provided has addressed the non-compliance and demonstrates how the RTO is addressing the impact of the non-compliance on students.

Completion

Standards for RTOs Clause 3.1

The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.

Findings: Not compliant

Evidence reviewed

- RTO Training and Assessment Strategies (3) (refer to clause 1.1 and 1.2)
- RTO suite of assessment materials provided for units in audit sample (refer to clause 1.8)
- Completed student assessment records reviewed at site:
 - BSB30215 Certificate III in Customer Engagement
 - Student 1
 - Student 2
 - BSB51915 Diploma of Leadership and Management
 - Student 3
 - BSB40515 Certificate IV in Work Health and Safety
 - Student 4
 - Student 5

BSB30215 Certificate III in Customer Engagement BSB40515 Certificate IV in Work Health and Safety BSB51915 Diploma of Leadership and Management

Note: During the conducting of the site audit, the RTO confirmed to the auditor that the assessment materials and judgement tools provided and reviewed at clause 1.8 are the same materials and judgement tools used and retained by the RTO since commencing delivery and assessment of the 10 BSB qualifications in June 2016.

- The RTO's current and past assessment practices, behaviours and systems did not demonstrate that the RTO issues AQF certification documentation only to learners whom it has assessed as meeting the requirements of the training product as specified in the relevant training package. For example, but not limited to:
 - The assessment process, judgement tools, assessment materials provided as detailed at clause 1.8 did not demonstrate that the RTO's own behaviours and practices are consistent with the RTO having implemented assessment systems and practices that ensure assessment including recognition of prior learning comply with the requirements of the NVR Standards for RTO's 2015, and
 - A review of selected student completed assessment records identified that the RTO's assessment practices, materials and judgement tools retained do not demonstrate that the RTO issues AQF certification documentation only to learners who have met the requirements of the relevant training product as specified in the relevant training package.

These practices and behaviours are non-compliant with Clause 3.1 of the *Standards for RTOs 2015*

Analysis of additional evidence:

BSB30215 Certificate III in Customer Engagement

BSB41415 Certificate IV in Work Health and Safety

BSB51915 Diploma of Leadership and Management

The following additional evidence was provided:

- Revised training and assessment strategy for each qualification (3)
- Issuing AQF Certification Documentation Procedure
- Training Completion Form
- Process for identifying former students issued with qualifications (1) and Statements of Attainment (4) in past 3 months and reviewing their files to identify gaps against unit of competency requirements
- Assessment validation of files to identify gaps against unit of competency requirements for former students (5)
- Emails notifying former students of gap training and assessment requirements (5)
- Review of current student files to identify gaps and organise re-assessment

- Email responses from students and bookings to address the impact on students (2).
- Performance Evidence Assessment instruments to be used for assessment of performance and knowledge gaps identified in student work for:
 - former student issued with *BSB30215 Certificate III in Customer Engagement*
 - current student enrolled in *BSB41415 Certificate IV in Work Health and Safety*

The evidence provided has addressed the non-compliance and demonstrates how the RTO is addressing the impact of the non-compliance on students.