



Australian Government

Australian Skills Quality Authority

# REPORT

## **Audit report: Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust**

RTO number:	22158
CRICOS number:	03013D
Date/s of audit:	14 - 15 July 2020
Date report created:	16 July 2020
Date report updated:	18 September 2020

## Organisation details

Organisation's legal name:	Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust
Trading name/s:	Australian Technical And Management College
RTO number:	22158
CRICOS number:	03013D

## Audit team

Lead auditor:	Eliza Chiam
Auditor/s:	Mary Oppy

## Audit details

Application number/s:	CHGCRI0005830 CHGCRI0005598 CHGCRI0005671 ADDVET0032844 ADDCRI0004297
Audit number/s:	AUDREC0010633
Audit reason/s:	Application - Change
Address of site/s visited:	N/A (desk audit)
Date/s of audit:	14 - 15 July 2020
Organisation's contact for audit:	Manish Malhotra Managing Director/Chief Executive Officer manish@atmc.edu.au 0383273100

## Original finding at time of audit

**Audit finding: Serious non-compliance**

**Report completed by:** Eliza Chiam

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1*, 1.2, 1.3*, 1.8*, 1.13*, 1.14, 1.16, 1.17*, 1.18*, 1.20*	11.1, 11.2*, 8.18, 8.19, 8.20	Not compliant
Enrolment	5.1, 5.2*, 5.3	2.2, 2.1*, 3.1, 3.3, 8.5, 3.4	Not compliant
Support and Progression	1.7	6.1*, 6.2, 6.3, 6.4, 6.9, 8.1, 8.3, 8.4, 8.9, 8.6, 8.7	Not compliant

\*Indicates a non-compliant clause

## Audit finding following analysis of additional evidence

**Audit finding following analysis of additional evidence provided on 04/09/2020: Concerning non-compliance**

**Report completed by:** Eliza Chiam

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1, 1.3, 1.8*, 1.13*, 1.17, 1.18, 1.20	11.2	Not compliant
Enrolment	5.2	2.1	Compliant
Support and Progression		6.1	Compliant

\*Indicates a non-compliant clause

## Background

Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust (the organisation) was granted RTO, and CRICOS registration in September, and October 2008 respectively.

The organisation partners with universities (Federation University Australia, and University of the Sunshine Coast) to deliver higher education qualifications.

In 2017, the organisation acquired Sheila Baxter Training Centre Pty. Ltd. (RTO code: 7030). Both organisations share the same management structure, and resources.

Throughout March to June 2020, the organisation submitted multiple applications (CHGCRI0005830, CHGCRI0005598, CHGCRI0005671, ADDVET0032844, and ADDCRI0004297) to add new qualifications in the Information and Communications Technology (ICT), Electrotechnology (UEE), and Tourism, Travel and Hospitality (SIT) Training Packages, and four new delivery sites in Melbourne, and Sydney.

On 9 July 2020, the organisation advised the withdrawal of its applications with the exception of *ICT80115 Graduate Certificate in Information Technology and Strategic Management* to be added to its VET scope of registration.

On 16 September 2020, the organisation submitted its withdrawal of *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application (ADDVET0032844) as it is no longer current, and superseded by *ICT60120 Advanced Diploma of Information Technology*. The organisation did not submit a new application for the current qualification as it does not align with the organisation's delivery strategy.

Summary of organisation and management structure:

- Managing Director/Chief Executive Officer: Dr Manish Malhotra
- Compliance Manager: Ms Natalie Robinson
- Training Manager: Mr Paul Sesta.

During audit, Dr Manish Malhotra advised that the organisation's Director of Studies, Mr Fred Garai no longer works for the organisation, and that it will be submitting a material change shortly to advise ASQA of this change.

Scope of organisation's registration:

VET/ CRICOS:

- *BSB50215 Diploma of Business*
- *BSB51918 Diploma of Leadership and Management*
- *BSB60215 Advanced Diploma of Business*
- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50113 Diploma of Early Childhood Education and Care*
- *ICT40118 Certificate IV in Information Technology*
- *ICT50118 Diploma of Information Technology*
- *SIT50416 Diploma of Hospitality Management*
- *22251VIC Certificate II in EAL (Access)*
- *22255VIC Certificate III in EAL (Further Study)*
- *22258VIC Certificate IV in EAL (Further Study)*
- *22485VIC Certificate II in EAL (Access)*
- *22491VIC Certificate III in EAL (Further Study)*
- *22492VIC Certificate IV in EAL (Further Study).*

ELICOS:

- *English for Academic Purposes (EAP 1&2)*
- *General English.*

Suburb and state of all delivery sites:

- 399 Lonsdale Street, Melbourne VIC 3000
- 601 Bourke Street, Melbourne VIC 3000
- Level 9, 540 George Street, Sydney NSW 2000
- 95 Albert Street, Brunswick VIC 3056 (Training kitchen).

Third party usage:

- The organisation engages with a number of education agents for the recruitment of its overseas student cohort.

Core clients/target groups:

- Overseas students.

Training Revenue (Funded or fee for service):

- Fee for service
- The organisation receives state funding (Skills First) for *CHC30113 Certificate III in Early Childhood Education and Care*, *CHC50113 Diploma of Early Childhood Education and Care*, *ICT50118 Diploma of Information Technology*, and *BSB51918 Diploma of Leadership and Management*.

Total number of current enrolments in the organisation as at audit date: **57**

- *BSB50215 Diploma of Business*: 4
- *BSB51918 Diploma of Leadership and Management*: 6
- *CHC30113 Certificate III in Early Childhood Education and Care*: 13
- *CHC50113 Diploma of Early Childhood Education and Care*: 22
- *ICT40118 Certificate IV in Information Technology*: 3
- *ICT50118 Diploma of Information Technology*: 6
- *SIT50416 Diploma of Hospitality Management*: 3.

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

- Information provided by students as part of a student survey or interview.
- Information provided directly by Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust to ASQA.

- Existing information and records held by ASQA concerning Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust.
- Information provided to ASQA's auditors and documentation reviewed during the desk audit of Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust conducted on 14 – 15 July 2020.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Face to face	22
<i>ICT80115 Graduate Certificate in Information Technology and Strategic Management</i>	Face to face	0
<i>ICT50118 Diploma of Information Technology</i>	Face to face	6

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

## Interviewees

Name	Position	Training products
Dr Manish Malhotra	Managing Director/ CEO	All
Mr Roch Van Delft	Group CEO	All
Ms Natalie Robinson	Compliance Manager	All
Mr Paul Sesta	Training Manager	All
Ms Joanne Cornelius	Consultant	All

## About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting 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 Organisation

Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust did not meet the following requirements:

- Clauses 1.1, 1.3, 1.8, 1.13, 1.17, 1.18, 1.20, and 5.2 of the Standards for RTOs
- Standards 2.1, 6.1, and 11.2 of the National Code.

Remedial action is required for the following training products:

- *CHC50113 Diploma of Early Childhood Education and Care*
  - *CHCECE018 Nurture creativity in children*
  - *CHCDIV001 Work with diverse people*
- *ICT50118 Diploma of Information Technology*
  - *ICTWEB501 Build a dynamic website*
  - *ICTWEB503 Create web-based programs.*

*The organisation is required to provide evidence that demonstrates:*

### Training and assessment

*Standards for RTOs Clause 1.3 and National Code Standard 11.2*

- the organisation now has a system in place to ensure that it has sufficient resources proportionate to the number of students enrolled at any time, the mode of delivery, location of delivery, and the strategies for training and assessment.

*Standards for RTOs Clause 1.1*

- the organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided.

*Standards for RTOs Clause 1.8*

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

*Standards for RTOs Clauses 1.13 – 1.20*

- the trainers/assessors currently used by the organisation meet the requirements of the standards.

**Enrolment**

*Standards for RTOs Clause 5.2 and National Code Standard 2.1*

- the organisation now has appropriate systems that are followed to ensure each learner is provided with accurate information to enable them to make an informed decision about undertaking training with the organisation.

**Support and progression**

*National Code Standard 6.1*

- the organisation now has an appropriate orientation programme for overseas students.

**Audit finding following analysis of additional evidence**

Following analysis of additional evidence provided by Australian Technical and Management College Pty Ltd as trustee for Australian Technical and Management College Trust on 04/09/2020, the organisation:

- provided sufficient evidence to demonstrate compliance with:
  - Clauses 1.1, 1.3, and 5.2 of the Standards for RTOs
  - Standards 2.1, 6.1, and 11.2 of the National Code.
- remains not compliant with:
  - Clauses 1.8, and 1.13 of the Standards for RTOs.

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

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

**Original Finding:** *Not compliant*

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

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

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - Training and assessment strategies:
    - *CHC50113 Diploma of Early Childhood Education and Care*
    - *ICT50118 Diploma of Information Technology*
    - *ICT80115 Graduate Certificate in Information Technology and Strategic Management.*
  - ATMC ACSF Entry Requirement
  - Timetables for Levels 3 and 4, 601 Bourke Street, Melbourne VIC 3000.
- The organisation's documented training and assessment strategies do not describe arrangements for delivery of the above training product which would enable each student to meet the requirements for each unit of competency in which they are enrolled. Specifically, the training and assessment strategies identify self-study hours; however, no further information has been provided in the training and assessment strategies to describe what these self-study hours consist of.
- The evidence provided does not clearly, and accurately describe the strategies to be implemented by the organisation to deliver and assess the above training products. Specifically,
  - the levels of LLN referenced under the entry requirements for the training products differ to the levels of LLN requirements in its ACSF Entry Requirement document.
  - For *ICT80115 Graduate Certificate in Information Technology and Strategic Management*, it identifies an ACSF LLN level 6 when the highest level of LLN is level 5.
  - *ICT80115 Graduate Certificate in Information Technology and Strategic Management* is to be delivered by trainers and assessors under supervision; however, this has not been reflected in the training and assessment strategy.

##### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - 1.1. CHC50113 Learning Activities - Legal and Ethical
  - 1.2. TAS1933\_CHC50113 - Diploma of Early Childhood Education and Care V2.0
  - 1.3. TAS2027\_ICT50118 - Diploma of Information Technology V3.0



- RTO website: <https://vet.atmc.edu.au/In-english-requirements/> (accessed on 8 September 2020).
- The organisation has addressed the non-compliance for future students.

**Auditor's note:** On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

National Code Standard 11.2	
	<b>Original Finding: <i>Not compliant</i></b>
	<b>Finding following additional evidence: <i>Compliant</i></b>
In seeking approval under 11.1, the provider must demonstrate any matters requested by the ESOS agency, including through the designated State authority if the provider is a school, which may include but are not limited to the following:	
11.2.1	the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority
11.2.2	the expected duration of the course includes any holiday periods or any work-based training
11.2.3	any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students
11.2.4	the course is not to be delivered entirely by online or distance learning
11.2.5	the provider and any partner they engage to deliver a course or courses to overseas students has adequate staff and education resources, including facilities, equipment, learning and library resources and premises as are needed to deliver the course to the overseas students enrolled with the provider
11.2.6	the maximum number of overseas students proposed by the provider for the location reflects the appropriateness of the staff, resources and facilities for the delivery of the course.

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - Student practical workplace placement agreements
  - Facility agreement - workplace placement training assessment between the organisation, and SLK Trading Armadale Pty Ltd
  - Facility agreement - workplace placement training assessment between the organisation, and G8 Education
  - Placement Centre Checks document
  - Equipment lists:
    - *CHC50113 Diploma of Early Childhood Education and Care*
    - *ICT50118 Diploma of Information Technology*
    - *ICT80115 Graduate Certificate in Information Technology and Strategic Management.*
- The organisation has not demonstrated that it has access to adequate facilities and equipment to support the number of students. For example:
  - *CHC50113 Diploma of Early Childhood Education and Care* students are required to complete work placement at a childcare centre where practical assessments are being conducted. While the organisation provided evidence of an equipment list, work placement agreements, and a placement centre check document that was completed by a trainer and assessor, the organisation has not demonstrated that it has an effective system in place to ensure that these childcare centres

meet all the resourcing requirements to conduct training, and assessment. While its placement centre check document indicates that the organisation confirms the number of children available, it does not indicate that the organisation has ensured that all relevant equipment (as listed in its equipment list) has been confirmed.

#### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - Attachment 2.1.1. Placement Centre Checks (provided during audit)
  - Attachment 2.1.2. Guide to NQF
  - Attachment 2.1.3. PG02-Strategy for work placement v1.1
  - Attachment 2.1.4. WP02-Strategy for work placement - Action Plan v1.1
  - Attachment 2.1.5. PG03-Work placement process v1.1
  - Attachment 2.1.5.1. P63-Student Work Placement for Early Childhood Education courses
  - Attachment 2.1.5.2. WP01-CHC Work Placement Induction Program v1.1.
- The organisation has addressed the non-compliance for future students.

**Auditor's note:** On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

Standards for RTOs Clause 1.3
<p style="text-align: right;"><b>Original Finding: <i>Not compliant</i></b></p> <p style="text-align: right;"><b>Finding following additional evidence: <i>Compliant</i></b></p> <p><b>The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:</b></p> <p><b>a) trainers and assessors to deliver the training and assessment;</b></p> <p><b>b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;</b></p> <p><b>c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and</b></p> <p><b>d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.</b></p>

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - Student practical workplace placement agreements
  - Facility agreement - workplace placement training assessment between the organisation, and SLK Trading Armadale Pty Ltd
  - Facility agreement - workplace placement training assessment between the organisation, and G8 Education
  - Placement Centre Checks document
  - Equipment lists:
    - *CHC50113 Diploma of Early Childhood Education and Care*
    - *ICT50118 Diploma of Information Technology*

- *ICT80115 Graduate Certificate in Information Technology and Strategic Management.*
- The organisation has not demonstrated that it has access to adequate facilities and equipment to support the number of students. For example:
  - *CHC50113 Diploma of Early Childhood Education and Care* students are required to complete work placement at a childcare centre where practical assessments are being conducted. While the organisation provided evidence of an equipment list, work placement agreements, and a placement centre check document that was completed by a trainer and assessor, the organisation has not demonstrated that it has an effective system in place to ensure that these childcare centres meet all the resourcing requirements to conduct training, and assessment. While its placement centre check document indicates that the organisation confirms the number of children available, it does not indicate that the organisation has ensured that all relevant equipment (as listed in its equipment list) has been confirmed.
  - The equipment list for *ICT80115 Graduate Certificate in Information Technology and Strategic Management* does not include all resources required. For example but not limited to:
    - Testing software(s).

#### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - Attachment 2.1.1. Placement Centre Checks (provided during audit)
  - Attachment 2.1.2. Guide to NQF
  - Attachment 2.1.3. PG02-Strategy for work placement v1.1
  - Attachment 2.1.4. WP02-Strategy for work placement - Action Plan v1.1
  - Attachment 2.1.5. PG03-Work placement process v1.1
  - Attachment 2.1.5.1. P63-Student Work Placement for Early Childhood Education courses
  - Attachment 2.1.5.2. WP01-CHC Work Placement Induction Program v1.1.
- The organisation has addressed the non-compliance for future students.

**Auditor's note:** On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

Standards for RTOs Clause 1.8	
<b>Original Finding: <i>Not compliant</i></b>	
<b>Finding following additional evidence: <i>Not compliant</i></b>	
<b>The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):</b>	
<b>a) complies with the assessment requirements of the relevant training package or VET accredited course; and</b>	
<b>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.</b>	
Table 1.8.1 Principles of Assessment	
Fairness	The individual learner's needs are considered in the assessment process. Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.

	The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.
Flexibility	Assessment is flexible to the individual learner by: <ul style="list-style-type: none"> <li>• reflecting the learner's needs;</li> <li>• assessing competencies held by the learner no matter how or where they have been acquired; and</li> <li>• drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.</li> </ul>
Validity	Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner. Validity requires: <ul style="list-style-type: none"> <li>• assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance;</li> <li>• assessment of knowledge and skills is integrated with their practical application;</li> <li>• assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and</li> <li>• judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.</li> </ul>
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.
Table 1.8.2 Rules of Evidence	
Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

*CHC50113 Diploma of Early Childhood Education and Care*

*CHCECE018 Nurture creativity in children*

*CHCDIV001 Work with diverse people*

- The following evidence was reviewed:
  - Assessment tools for:

*CHCECE018 Nurture creativity in children*

    - Student assessment pack
    - Assessor pack
    - Assessor assessment pack
      - Mapping document
      - Marking guide.
    - Assessments:
      - Assessment 1 – Project:
        - Task 1: Physical environment
        - Task 2: Human environment
        - Task 3: A learning framework.

- Assessment 2 – Written test
- Assessment 3 – Work placement task:
  - Program 1: Visual arts (inspired by inventors)
  - Program 2: Music/movement (inspired by culture)
  - Program 3: Science/ math/ technology
  - Program 4: Construction (inspired by architecture)
  - Program 5: Dramatic/ imaginative (inspired by theatre & literacy).

*CHCDIV001 Work with diverse people*

- Student assessment pack
- Assessor pack
- Assessor assessment pack
  - Mapping document
  - Marking guide.
- Assessments:
  - Assessment 1 – Research project
  - Assessment 2 – Project.
- Completed student assessment items:

*CHCECE018 Nurture creativity in children*

- HYL (D00075)
- ALC (VET001286).

*CHCDIV001 Work with diverse people*

- NA (D00018)
- LBH (VET000359)
- NJ (VET000301).

- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
  - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
  - that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.
- Reliability - the assessment tools do not contain sufficient performance benchmarks for each skill and/or behaviour to be demonstrated; therefore, it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors. For example, but not limited to:

*CHCECE018 Nurture creativity in children*

- The marking checklist for assessment 1 includes a range of criterion that a student has to complete to be deemed satisfactory for this task. The checklist included, for example but not limited to:
  - 'Model respect, care and appreciation for the natural environment finding ways of enabling children to care for and learn from the land'
  - 'Select the other materials based on children ability to interest and stimulate, while allowing for free expression'
  - 'Promote the use of the chosen creative expression to the children'
  - 'Model explicit communication strategies to support children to initiate interactions and join in play and social experiences in ways that sustain productive relationships with other children'
  - 'Balance between children's spontaneity and activities that are planned'.
- As part of the student's work placement, the relevant supervisors are required to complete a 'Work place Industry Experts Report', which includes a range of criterion that a student has to complete to be deemed satisfactory. The checklist included, for example but not limited to:
  - 'Apply ethnical and nurturing practices in work with children and young people'
  - 'Reflect on own cultural identity and biases'
  - 'Identify and develop cultural competency'

- *'Support individual cultural identities'*
- *'Minimise risks'*
- *'Contribute to the ongoing management of allergies'*
- *'Promote healthy eating'*.

*CHCDIV001 Work with diverse people*

- The marking checklist for assessment 2 includes a range of criterion that a student has to complete to be deemed satisfactory for this task. The checklist included, for example but not limited to:
  - *'Consider the impact of social and cultural diversity'*
  - *'Respect diversity of all people'*
  - *'Effective communication techniques were used where language barrier existed'*
  - *'Describe principles of equal opportunity in Australia and how it promotes best practice in the early childhood industry'*.

The marking checklists lack sufficient performance benchmarks to enable consistent assessment decisions.

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

*CHCDIV001 Work with diverse people*

- legal and ethical considerations (international, national, state/territory, local) for working with diversity, how these impact individual workers, and the consequences of breaches:
  - discrimination:
    - age
    - disability
    - racial
    - sex.
  - human rights:
    - Universal declaration of human rights
    - relationship between human needs and human rights
    - frameworks, approaches and instruments used in the workplace
  - rights and responsibilities of workers, employers and clients, including appropriate action when rights are being infringed or responsibilities not being carried out.

The mapping document indicates that the elements above are assessed in question 11 'What are the legal and ethical considerations when working with diversity' of assessment 1, and question 7 'explain the principles of equal opportunity in Australia and how it promotes best practice in the early childhood industry'.

The questions do not collectively address how these elements would impact on individual workers, and the consequences of breaches.

Further noting that the benchmark response for question 11 was a direct copy paste of the element above.

- key areas of diversity and their characteristics, including:
  - culture, race, ethnicity
  - disability
  - religious or spiritual beliefs
  - gender, including transgender
  - intersex
  - generational
  - sexual orientation/sexual identity - lesbian, gay, bisexual, heterosexual.

The mapping document indicates that the elements above are assessed in assessment 1 question 1 'a. define the term concept of diversity, b. identify five(5) classifications of cultural diversity', and questions 1, and 3 of assessment 2 where the student is required to respond to a case study in relation to three educators from various backgrounds (India, China, and Australia - Aboriginal or Torres Strait Islander).

The questions above collectively do not address all key areas of diversity, and their relevant characteristics.

- potential needs of marginalised groups, including:
  - protective factors

- physical, mental and emotional health issues/care needs
- consideration of impacts of discrimination, trauma, exclusion and negative attitudes.

The mapping document indicates that the elements above are assessed in assessment 1, question 4 *'explain in detail three (3) examples of work practices that appreciate diversity and inclusiveness in relation to professional behaviour/ care within Early Childhood Service'*, and 5 *'describe in detail three (3) behavioural expectations that are specific to and experienced by the 3 educators in the team and explore how these expectations would be managed within the ATMC Early Learning Centre'*.

The questions above collectively do not address the elements above.

- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training package and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:

*CHCECE018 Nurture creativity in children*

○ HYL (D00075):

- Assessment 2, question 6 requires the student to *'give at least three (3) types for each of the following, which can be introduced to children: a. arts, b. music, c. dance'*.

The model response for music included *'alternative, rock, and grunge'*, and for dance included *'ballet, jazz, and hip hop'*. The student's response included play instruments for music, and yoga for dance, and were marked as satisfactory.

- Assessment 2, question 8 requires the student to *'identify the benefits of: a. asking children questions about their creations, b. sharing enthusiasm for creative work with children, c. encouraging children to respects and appreciate the creative work of peers'*.

The student's response for a. included *'Do you like...?'*, and *'Where the idea come from?'*, b. included *'display children's work in the room'*, *'suggests no matter how much effort they have put into their work it is not as good as the work of their peers'*, *'tell children the process of creating is just as important as the result'*, *'value uniqueness'*, for c. included *'to talk about their creations so they can explain and articulate what they have done and why they have done it'*.

The student's response did not identify the benefits, and were marked as satisfactory.

*ICT50118 Diploma of Information Technology*

*ICTWEB501 Build a dynamic website*

*ICTWEB503 Create web-based programs*

- The following evidence was reviewed:

○ Assessment tools for:

*ICTWEB501 Build a dynamic website*

- Student assessment pack
- Assessor pack
- Assessor assessment pack
  - Mapping document
  - Marking guide.
- Assessments:
  - Assessment 1 – Project:
    - Task 1: Researching the technical requirements
    - Task 2: Building the software design specifications
    - Task 3: Creating the website
    - Task 4: Testing the web application.
  - Assessment 2 – Written test.

*ICTWEB503 Create web-based programs*

- Student assessment pack
- Assessor pack
- Assessor assessment pack

- Mapping document
- Marking guide.
- Assessments:
  - Assessment 1 – Project:
    - Task 1: Investigation into the hypertext transfer protocol (HTTP)
    - Task 2: Session management
    - Task 3: Applications development in a stateless environment.
  - Assessment 2 – Written test.
- Completed student assessment items:
  - ICTWEB501 Build a dynamic website*
    - LNKP (VET000331)
    - JLMC (VET000349).
  - ICTWEB503 Create web-based programs*
    - LNKP (VET000331)
    - JLMC (VET000349).
- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
  - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
  - that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.
- Reliability - the assessment tools do not contain sufficient performance benchmarks for each skill and/or behaviour to be demonstrated; therefore, it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors. For example, but not limited to:
  - ICTWEB501 Build a dynamic website*
    - The marking checklist for assessment 1 includes a range of criterion that a student has to complete to be deemed satisfactory for this task. The checklist included, for example but not to:
      - Explore non-functional requirements including business requirements and relevant standards
      - Develop content design in a logical and accessible manner to the user
      - Integrate the components into the website
      - Anticipate and describe adjustment process.
  - ICTWEB503 Create web-based programs*
    - The marking checklist for assessment 1 includes a range of criterion that a student has to complete to be deemed satisfactory for this task. The checklist included, for example but not to:
      - Detail the advantages of the required HTTP
      - Produce the code to handle session management
      - Review and debug the code.

The marking checklists lack sufficient performance benchmarks to enable consistent assessment decisions.
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
  - ICTWEB503 Create web-based programs*
    - LNKP (VET000331): Assessment 2, question 6 requires the student to 'list and describe 5 principles of web analysis and design'. The model response included 'purpose', 'communication', 'typefaces', 'colours', 'images', 'navigation', 'grid based layouts', 'F pattern design', 'load time', and 'mobile



*friendly*'. The student's response included '*simplicity*', '*visual hierarchy*', and '*load time*', which are not part of the model response, and was marked as satisfactory.

- JLMC (VET000349): Assessment 2, question 6 requires the student to '*list and describe 5 principles of web analysis and design*'. The model response included '*purpose*', '*communication*', '*typefaces*', '*colours*', '*images*', '*navigation*', '*grid based layouts*', '*F pattern design*', '*load time*', and '*mobile friendly*'. The student's response included '*availability and accessibility*', '*clarity*', '*learnability*', '*credibility*', and '*relevancy*', which are not part of the model response, and was marked as satisfactory.
- JLMC (VET000349): Assessment 2, question 11 requires the student to '*explain session management with example*'. The model response included explanation of how session managements are implemented. The student's response included a programming code as an example, and was marked as satisfactory.

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*  
*ICTTEN811 Evaluate and apply network security*

- The following evidence was reviewed:
  - Assessment tools for:  
*ICTTEN811 Evaluate and apply network security*
    - Student assessment pack
    - Assessor pack
    - Assessor assessment pack
      - Mapping document
      - Marking guide.
    - Assessments:
      - Assessment 1 – Written test
      - Assessment 2 – Project:
        - Task 1: Analyse and report on Protocols used for data transmission
        - Task 2: Analyse and report on DSS principles, key cryptography, internet protocols for network security.
      - Assessment 3 – Project:
        - Task 1: Analyse and prepare a report on Web, Network management
        - Task 2: Report on recommendations for enhancements in network security management.
- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
  - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
- Fairness - the assessment tools do not provide clear information to the student to fully inform them of the assessment process and conditions. For example, but not limited to:
  - Assessment 1 instructions states '*The assessor will set a duration for this assessment task. If a student cannot complete the assessment in the stated time then this needs to be considered when assessing overall competency*'. The assessment tool does not provide clear guidance as to what the assessment timeframe is for this assessment.  
 Further, the assessment tool does not provide an explanation in relation to its assessment instructions - '*if a student cannot complete the assessment in the stated time then this needs to be considered when assessing overall competency*'. As such, it is unclear how a student's assessment duration would impact on them achieving competency.

- Reliability - the assessment tools do not contain sufficient performance benchmarks for each skill and/or behaviour to be demonstrated; therefore, it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors. For example, but not limited to:

*ICTTEN811 Evaluate and apply network security*

- The marking checklist for assessment 2, and 3 include a range of criterion that a student has to complete to be deemed satisfactory for these tasks. The checklist included, for example but not to:
  - Analyse the interrelationship of IP to OSI model and the impact on network topologies and network elements
  - Investigate TCP/IP operations
  - Analyse Label Switching
  - Analyse IP multi casting protocols
  - Describe the one-way hashing and secure hashing functions
  - Analyse System Threats
  - Define web threats
  - Analyse and discussed the selection and protections of passwords
  - Explain network security management principles with the recommendations for improvement.

Further, the assessment tool does not include model answers for Assessment 2, and 3.

The marking checklists lack sufficient performance benchmarks to enable consistent assessment decisions.

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

- Performance Criteria:

- 1.2 Assess media access control (MAC) and IP addressing, and their application in security. The assessments do not require the student to assess each item or to include their application in security. Further, the model response does not include guidance on assessing each of their application in security. Item 3 from the checklist for assessment 2 only states 'analyses MAC, IP addressing'.
- 1.3 Report on transmission control protocol/internet protocol (TCP/IP) operations and use of transport protocols for transmitting data over the network.

The marking guide indicates that this performance criteria is assessed in assessment 1, question 11, and assessment 2 checklist item 4. The assessments collectively do not require the student to report on this item.

- 1.4 Examine various types of routing protocols and the implications on security.

The criteria above is assessed in assessment 1, question 8, and assessment 2 checklist item 5.

The implications on security is not included in assessment 2 checklist item 5.

- 1.5 Analyse forms of label switching as applied to data packets.

The criteria above is assessed in assessment 1, question 11, and assessment 2 checklist item 6.

The assessments collectively do not address this criteria as assessment 2 checklist item 6 does not include data packets.

- Foundation Skills:

- Writing - Prepares clear and concise workplace documentation, including reports and recommendations incorporating technical language, to communicate complex information clearly and effectively.

The skill above is assessed in assessment 1, questions 6, 11, 13, 15, 17, 18, 20, and 21, assessment 2 checklist items 1, and 11, and assessment 3 checklist items 1, and 11.

As the assessment tool did not include model answers or any clear performance benchmarks for assessment 2, and 3, it cannot be confirmed how the assessment system ensure that the level of response required meets the level of writing required in the training package.

- Numeracy - Uses mathematical subtlety and a clear set of steps to solve public-key encryption and least-cost algorithms.

The skill above is assessed in assessment 1, questions 11, 17, and 18, assessment task 2 checklist items 7, and 20, and assessment task 3 checklist item 2.

Notwithstanding that the questions in assessment 1 do not require the students to solve public-key encryption, and least-cost algorithms, it cannot be confirmed that this skill will be assessed in assessment tasks 2, and 3 as the assessment tool did not include model answers or any clear

performance benchmarks to demonstrate that it meets the level of numeracy required in the training package.

- Knowledge Evidence:

*ICTTEN811 Evaluate and apply network security*

- evaluate algorithms used in IP network security

The element above is assessed in assessment 1, question 2 'What are the different encryption and authentication algorithms used for security of an IP network?'.  
This question does not fully address the element above where the student is expected to evaluate the algorithms, but to simply list the differences. Further, the model response provided for the assessor does not include an evaluation of the two algorithms, rather only a short summary of each.

- Australian Qualifications Framework (AQF) levels and the AQF levels criteria are an indication of the relative complexity and/or depth of achievement and the autonomy required to demonstrate that achievement.

Notwithstanding the findings under 'validity and sufficiency', the assessment tool overall does not demonstrate the depth of skills required under AQF level 8 (Graduate Certificate) as the majority of assessments are direct questions. Further, insufficient evidence has been provided to demonstrate that the assessment requires the students to demonstrate ability to 'analyse critically, evaluate and transform information', and 'transmit knowledge, skills and ideas to others'.

#### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*

*CHCECE018 Nurture creativity in children*

*CHCDIV001 Work with diverse people*

- The following additional evidence was reviewed:

- 22158 - ATMC - Audit Response Summary.pdf

- Assessment tools for:

*CHCECE018 Nurture creativity in children*

- Student assessment pack, version 2.0
- Assessment pack (print pack), version 2.0
- Assessor assessment pack, version 2.0
- Curriculum portfolio – simulated overview, version 1.1
- Curriculum portfolio checklist – simulated – part 4 question and plan, version 1.1
- Curriculum portfolio checklist – simulated – part 5 implementation, version 1.1
- Curriculum portfolio checklist – simulated – part 6 evaluation and reflection, version 1.1
- Curriculum portfolio – work placement overview, version 1.1
- Curriculum portfolio checklist – work placement – part 4 question and plan, version 1.1
- Curriculum portfolio checklist – work placement – part 5 implementation, version 1.1
- Curriculum portfolio checklist – work placement – part 6 evaluation and reflection, version 1.1
- Assessments:
  - Assessment 1 – simulated portfolio
  - Assessment 2 – work placement portfolio
  - Assessment 3 – direct observation.

*CHCDIV001 Work with diverse people*

- Assessment pack (print pack), version 1.6
- Assessor assessment pack, version 1.6
- Student assessment pack, version 1.6
- Assessments:
  - Assessment 1 – research project
  - Assessment 2 – project.

- The organisation has addressed the non-compliance for future students. The organisation provided updated assessment tools to address the findings above.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students.

#### *CHCECE018 Nurture creativity in children*

- For student HYL (D00075), the original findings included:
  - Assessment 2, question 8 requires the student to *'identify the benefits of: a. asking children questions about their creations, b. sharing enthusiasm for creative work with children, c. encouraging children to respects and appreciate the creative work of peers'*.

The student's response for a. included *'Do you like...?'*, and *'Where the idea come from?'*, b. included *'display children's work in the room'*, *'suggests no matter how much effort they have put into their work it is not as good as the work of their peers'*, *'tell children the process of creating is just as important as the result'*, *'value uniqueness'*, for c. included *'to talk about their creations so they can explain and articulate what they have done and why they have done it'*.

The student's response did not identify the benefits, and were marked as satisfactory.

In response, the organisation stated *'this question provides evidence of the student's ability to encourage children to talk about their creations through open ended questions, enthusiasm and appreciate children's efforts. The student's response in context as a whole response demonstrates examples of how to encourage children to talk about their creations. The student can demonstrate the benefits of encouraging children to discuss their creations through their understanding of question choices provided. As per the marking guide, the student has provided examples instead of a written example. Examples support the student's understanding and knowledge demonstrated'*.

While acknowledging the organisation's intent for this question, it has not addressed the fundamental issue that the student has not adequately answered this question by explaining the benefits, rather providing examples as to what question they would ask the children. Further, it is unclear how the student's response of *'suggests no matter how much effort they have put into their work it is not as good as the work of their peers'*, would fit into the organisation's rationale provided above of *'provides evidence of the student's ability to encourage children to talk about their creations through open ended question, enthusiasms and appreciate children's efforts'*.

#### *CHCDIV001 Work with diverse people*

- The organisation's response included an analysis as to how its past students have met the requirements by referencing elements, and assessment from other units of competency within *CHC50113 Diploma of Early Childhood Education and Care*, including *CHCPRT001 Identify and respond to children and young people at risk*, and *CHCECE001 Develop cultural competence*, *CHCLEG001 Work legally and ethically*. While the organisation's claims may be valid, the analysis did not provide sufficient detail that clearly demonstrates how these other questions address all of the knowledge evidence requirements that were not assessed above. Notwithstanding the above, the organisation did not provide any supporting evidence to demonstrate that its students (within the remedial action required timeframe) have successfully completed all referenced units. Further, the assessment tool states *'this unit is not co-assessed with any other unit'*.

**Auditor's note:** the mapping document for *CHCDIV001 Work with diverse people* references question 11d; however, the assessments only go up to question 11c.

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - Assessment tools for:
    - ICTWEB501 Build a dynamic website*
      - Assessment pack (print pack), version 6.1
      - Assessor assessment pack, version 6.1
      - Student assessment pack, version 6.1
      - Assessments:
        - Assessment 1 – project:
          - Task 1: Researching the technical requirements
          - Task 2: Building the software design specifications
          - Task 3: Creating the website
          - Task 4: Testing the web application.
        - Assessment 2 – written test.
    - ICTWEB503 Create web-based programs*
      - Assessment pack (print pack), version 6.1
      - Assessor assessment pack, version 6.1
      - Student assessment pack, version 6.1
      - Assessments:
        - Assessment 1 – project:
          - Task 1: Investigation into the hypertext transfer protocol (HTTP)
          - Task 2: Session management
          - Task 3: Applications development in a stateless environment
        - Assessment 2 – written test.
- The organisation has addressed the non-compliance for future, and current students. The organisation provided updated assessment tools to address the findings above. The organisation also provided an explanation for the individual student responses.

**Auditor's note:** On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

## Trainer and assessor competency

### Standards for RTOs Clause 1.13

**Original Finding:** *Not compliant*

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

In addition to the requirements specified in Clause 1.14 and Clause 1.15, the RTO's training and assessment is delivered only by persons who have:

- a) vocational competencies at least to the level being delivered and assessed;
- b) current industry skills directly relevant to the training and assessment being provided; and
- c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - Trainer and assessor files:
    - CHC50113 Diploma of Early Childhood Education and Care*
      - Leah Dedman
      - Kathryn Findlater.
    - ICT50118 Diploma of Information Technology*
      - Ignatius Abraham.
    - ICT80115 Graduate Certificate in Information Technology and Strategic Management*
      - Vijeta Bhatia
      - Archana Mittal.
- The organisation did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess vocational competencies to the level required by the relevant units of competency from the training package:
  - Leah Dedman
  - Kathryn Findlater
  - Ignatius Abraham
  - Vijeta Bhatia
  - Archana Mittal.

Specific examples of non-compliance include:

- Leah Dedman: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
  - *BSBWOR404 Develop work priorities*: the trainer matrix referenced *CHCORG506E Coordinate the work environment*, and *CHCCOM003 Develop communication strategies*, and stated 'assists to develop knowledge of effective work practices, workplace relations and staff performance. Knowledge covers setting group goals for the team and managing the team environment'.
  - *BSBLED401 Develop teams and individuals*: the trainer matrix referenced *CHCORG506E Coordinate the work environment*, and *CHCCOM003 Develop communication strategies*, and *BSBHRM512 Develop and manage performance management processes*. It also stated 'The units provided knowledge for promoting team feedback, individual performances and effective team management. Together with certificates in becoming a confident trainer and teach adult learners assists in developing the competency to the lead team'.
- Kathryn Findlater: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
  - *CHCECE001 Develop cultural competence*: the trainer matrix referenced multiple units of competency, and summarised previous employment; however, insufficient information has been provided in the trainer matrix to demonstrate vocational competencies to all the elements in the relevant unit of competency.
  - *CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety*: the trainer matrix referenced multiple units of competency, and summarised previous employment; however, insufficient information has been provided in the trainer matrix to demonstrate vocational competencies to all the elements in the relevant unit of competency.
- Ignatius Abraham: while it is acknowledged that this trainer and assessor holds *ICT50115 Diploma of Information Technology* (superseded and equivalent to *ICT50118 Diploma of Information Technology*), the record of results indicate that he does not hold all the units in *ICT50118 Diploma of Information Technology*. Further, insufficient information has been provided in his trainer matrix to demonstrate equivalency. For example but not limited to:

- *ICTWEB429 Create a mark-up language document to specification*: the trainer matrix referenced 'Diploma of IT – GQ Nov-2016', 'Divine Computer Support – Director', and 'Developed web based software using HTML, PHP and Javascript'.
  - *ICTWEB501 Build a dynamic website*: the trainer matrix referenced 'Diploma of IT – GQ Nov-2016', 'Divine Computer Support – Director', and 'Developed 3 Web based applications as per client requirements. They are continuously developed and upgraded'.
  - *ICTWEB502 Create dynamic web pages*: the trainer matrix referenced 'Diploma of IT – GQ Nov-2016', 'Divine Computer Support – Director', and 'produced dynamic web pages that include both client and server-side dynamic content as per the specification'.
- Vijeta Bhatia: This trainer and assessor's trainer matrix references his past job experiences, and how it relates to the elements in the training package; however, the organisation did not provide any evidence to support these claims. By way of example, employment contracts or letter of employment.
  - Archana Mittal: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
    - *ICTICT809 Facilitate business analysis*: the trainer matrix referenced supporting qualifications ('MCA', 'HDISM', 'ACEP'), and 'Consultant (ATMC Singapore Pty Ltd) coordination with ATMC Melbourne staff for results and diploma of students, collecting status from difference centres all over India, Taking [sic] interviews for faculty approval at different campuses of the company'.
    - *ICTTEN811 Evaluate and apply network security*: the trainer matrix referenced supporting qualifications ('MCA', 'HDISM', 'ACEP'), and 'Done software project on University online System in Java/J2EE', 'Done software project on IT-Resources in C#, Mysql with T.T Tech, Noida'.

Further, the organisation did not provide any evidence to support these claims. By way of example, employment contracts or letter of employment.
  - The organisation did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess relevant industry currency:
    - Leah Dedman
    - Kathryn Findlater
    - Ignatius Abraham
    - Vijeta Bhatia
    - Archana Mittal.

Specific examples of non-compliance include, but are not limited to:

- Leah Dedman: *HLTAID004 Provide an emergency first aid response in an education and care setting*: The Australian Resuscitation Council Guideline 10.1 – Basic Life Support (BLS) Training states 'all those trained in CPR should refresh their CPR skills at least annually'. This trainer and assessor's most recent *HLTAID001 Provide cardiopulmonary resuscitation* statement of attainment was obtained on 6 February 2019. The organisation did not provide any further evidence to demonstrate that this trainer and assessor meets the industry requirement for this unit of competency.
- Kathryn Findlater: *HLTAID004 Provide an emergency first aid response in an education and care setting*: The Australian Resuscitation Council Guideline 10.1 – Basic Life Support (BLS) Training states 'all those trained in CPR should refresh their CPR skills at least annually'. The organisation did not provide evidence to demonstrate that this trainer and assessor holds a statement of attainment for *HLTAID001 Provide cardiopulmonary resuscitation*. Further, the trainer matrix states 'my first aid is currently not up to date'.
- Ignatius Abraham: this trainer and assessor's trainer matrix, and curriculum vitae states that he is the Director for Divine Computer Support; however, insufficient information has been provided to demonstrate industry currency.

- Vijeta Bhatia: this trainer and assessor's curriculum vitae indicate that she is currently a Program Coordinator at Beyond Teaching Services Pvt. Ltd; however, the organisation has not provided any evidence to support this statement.
- Archana Mittal: this trainer and assessor's curriculum vitae indicate that he is currently teaching part time, and a content developer at Sai Archana Coaching Institute, and a lecturer at Beyond Teaching Services Pty. Ltd; however, the organisation has not provided any evidence to support this statement.

#### *Analysis of additional evidence*

#### *CHC50113 Diploma of Early Childhood Education and Care*

#### *ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - Trainer and assessor files:
    - CHC50113 Diploma of Early Childhood Education and Care*
      - Leah Dedman
      - Kathryn Findlater.
    - ICT50118 Diploma of Information Technology*
      - Ignatius Abraham.
- The organisation has not addressed the non-compliance for future students.
- The organisation did not provide sufficient evidence to demonstrate that the below listed trainer and assessor possesses vocational competencies to the level required by the relevant units of competency from the training package:
  - Kathryn Findlater: *CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety*. While the updated trainer matrix included further details that covers workplace responsibilities, and relevant professional development, it cannot be confirmed that this trainer and assessor possesses the vocational competency for this unit.

While the organisation provided evidence of professional development in cross cultural communication, and professional development titled '*Welcome to country and Acknowledge of Country*', both the professional development documents, and examples of work in the trainer matrix do not provide sufficient information to support this trainer's competency for this unit as it has a specific focus on Aboriginal and/or Torres Strait Islander culture. As an example, the trainer matrix stated '*to evaluate cultural safety in the service it is important to describe in detail the program, it's [sic] objectives, and how its components lead to its intended outcomes. Culture safety was evaluated by identifying how the families, staff and community felt within the service. They were asked to share this information. Educators were responsible for paying attention to how families reacted when entering the service and regularly review the culture resources around the service. Did it include all families [sic] culture, di [sic] it include community cultures. It was important for the workplace that the families and community felt they belonged within the service and culture safety played a key part in this*'. The examples provided within the trainer matrix reflects how the trainer would approach cultural safety generally, and has not been tailored to reflect how this would apply in an Aboriginal and/or Torres Strait Islander context.

- The organisation did not provide sufficient evidence to demonstrate that the below listed trainer possesses relevant industry currency:
  - Leah Dedman: *HLTAID004 Provide an emergency first aid response in an education and care setting*: The Australian Resuscitation Council Guideline 10.1 – Basic Life Support (BLS) Training states '*all those trained in CPR should refresh their CPR skills at least annually*'. This trainer and



assessor's most recent *HLTAID001 Provide cardiopulmonary resuscitation* statement of attainment was obtained on 6 February 2019.

The organisation response stated that '*the trainer has since updated their CPR training*', and the relevant trainer and assessor's trainer matrix identified that they obtained *HLTAID001 Provide cardiopulmonary resuscitation* from CPR First Aid on 29 July 2020; however, the organisation did not provide evidence to support this claim.

**Auditor's notes:**

- The organisation's response stated that Kathryn Findlater no longer delivers *HLTAID004 Provide an emergency first aid response in an education and care setting* from the qualification *CHC50113 Diploma of Early Childhood Education and Care*.
- On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

**Standards for RTOs Clause 1.17**

**Original Finding:** *Not compliant*

**Finding following additional evidence:** *N/A*

Where the RTO, in delivering training and assessment, engages an individual who is not a trainer or assessor, the individual works under the supervision of a trainer and does not determine assessment outcomes.

**Standards for RTOs Clause 1.18**

**Original Finding:** *Not compliant*

**Finding following additional evidence:** *N/A*

The RTO ensures that any individual working under the supervision of a trainer under Clause 1.17:

- a) holds the training and assessment credential specified in Item 6 of Schedule 1.
- b) has vocational competencies at least to the level being delivered and assessed; and
- c) has current industry skills directly relevant to the training and assessment being provided.

**Standards for RTOs Clause 1.20**

**Original Finding:** *Not compliant*

**Finding following additional evidence:** *N/A*

Without limiting Clauses 1.17 - 1.19, the RTO:

- a) determines and puts in place:
  - i) the level of the supervision required; and
  - ii) any requirements, conditions or restrictions considered necessary on the individual's involvement in the provision of training and collection of assessment evidence; and
- b) ensures that trainers providing supervision monitor and are accountable for all training provision and collection of assessment evidence by the individual under their supervision.

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - Trainer and assessor files:
    - Dr Mohammad Motahar
    - Dr Shahzad Iqbal Mian
    - Nityansh Rattan.
  - Plans for direct supervision arrangement:
    - Dr Mohammad Motahar
    - Dr Shahzad Iqbal Mian
    - Nityansh Rattan.

- The organisation has not ensured that individuals who are not trainers or assessors will work only under the supervision of a suitably qualified trainer. Refer to Clauses 1.13, and 1.14 for details.
- The organisation did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess vocational competencies to the level required by the relevant units of competency from the training package:
  - Dr Mohammad Motahar
  - Dr Shahzad Iqbal Mian
  - Nityansh Rattan.

Specific examples of non-compliance include:

- Dr Mohammad Motahar: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
  - *ICTICT809 Facilitate business analysis*: the trainer matrix referenced 'Doctorate in Computer Science', 'Associate Degree in Software Engineering', 'Senior Consultant (ERP)', 'Product Development Manager', 'Lead developer and play an active role in an on going [sic] process of hiring, training and building virtual team of analyst programmers/ vendors to expand the department of software development for ERP customisations using the offshore team'
  - *ICTTEN811 Evaluate and apply network security*: the trainer matrix referenced 'Doctorate in Computer Science', 'Executive Master Degree in Open Source Computing', 'System Analyst', 'Solution Architect for the ERP Project by integrating document management system & business intelligence tools to the ERP package'.
- Dr Shahzad Iqbal Mian: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
  - *ICTTEN811 Evaluate and apply network security*: the trainer matrix referenced 'PhD Electronic Engineering – Specialisation in Wireless and Antennas Designing', 'Macquarie University, Teaching and Study: Data Communication', 'ATMC Academic Teaching: Mobile network and wireless communication'.
- Nityansh Rattan: insufficient information has been provided in the trainer and assessor's trainer matrix. For example but not limited to:
  - *ICTICT810 Synchronise ICT projects*: the trainer matrix referenced multiple qualifications, 'Project Manager & Tech Consultant: Organising client projects in JIRA using Kanban Software development and Scrum for Software development life cycle (SDLC), organising daily tasks in Basecamp PM tool for the employees, organising F2F and phone based meetings with new and existing clients', and 'Client Relationship Management: SCRUM Preparation and Weekly staff Meetings: negotiating on the Project Budget with Clients with a fair explanation and logical reasoning on the facts and figures; building client relationship and explaining the proposals, strategies and working processes to clients'.
- The organisation did not provide sufficient evidence to demonstrate that the below listed trainers and assessors possess relevant industry currency:
  - Dr Mohammad Motahar
  - Dr Shahzad Iqbal Mian
  - Nityansh Rattan.

Specific examples of non-compliance include:

- Dr Mohammad Motahar: this trainer and assessor's curriculum vitae, and trainer matrix indicate that he is a Senior Consultant (ERP) at Ioppolo and Associates; however, the organisation did not provide any further evidence to support this claim.
- Dr Shahzad Iqbal Mian: this trainer and assessor's trainer matrix stated 'membership of The Institute of Electrical and Electronics Engineers, accessing their publications and journals to maintain my currency'; however, the organisation did not provide any further evidence to support this claim.

- Nityansh Rattan: this trainer and assessor's curriculum vitae, and trainer matrix indicate that he is a Technical Account Manager at One Stop Media Group Pty Ltd; however, the organisation did not provide any further evidence to support this claim.
- The organisation's supervisory arrangements for individuals who are not trainers or assessors do not define the level of supervision required for proposed delivery of training and conduct of assessment for the above training product.  
The three individuals will be supervised by both Vijeta Bhatia, and Archana Mittal. Part of the supervision plan includes classroom observations. Archana Mittal does not reside in Australia, and the supervision plan does not include the details as to how these classroom observations will be conducted, and the frequency of these observations.

**Auditor's note:** the assessment summary sheets for *ICT80115 Graduate Certificate in Information Technology and Strategic Management* includes signatory blocks for both the relevant assessor's and the supervising assessor or invigilator (if applicable). This creates confusion that the trainer and assessor under supervision determines outcomes, and the outcome is then confirmed by their relevant supervisor. As per Clause 1.17, an individual who is not a trainer or assessor who works under the supervision of a trainer does not determine assessment outcomes.

#### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*  
*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf.

**Auditor's note:** On 16 September 2020, the organisation withdrew *ICT80115 Graduate Certificate in Information Technology and Strategic Management* from its VET change to scope application as it is no longer current. As such, the outstanding findings for this qualification no longer applies.

## Enrolment

### Standards for RTOs Clause 5.2

**Original Finding:** *Not compliant*

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

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:
  - i) estimated duration;
  - ii) expected locations at which it will be provided;
  - iii) expected modes of delivery;
  - iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and
  - v) any work placement arrangements.

- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.
- d) the learner's rights, including:
  - i) details of the RTO's complaints and appeals process required by Standard 6; and
  - ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;
- e) the learner's obligations:
  - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;
  - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and
  - iii) any materials and equipment that the learner must provide; and
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

#### National Code Standard 2.1

*Original Finding: **Not compliant***

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

Prior to accepting an overseas student or intending overseas student for enrolment in a course, the registered provider must make comprehensive, current and plain English information available to the overseas student or intending overseas student on:

- 2.1.1 the requirements for an overseas student's acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required, and course credit if applicable
- 2.1.2 the CRICOS course code, course content, modes of study for the course including compulsory online and/or work-based training, placements, other community-based learning and collaborative research training arrangements, and assessment methods
- 2.1.3 course duration and holiday breaks
- 2.1.4 the course qualification, award or other outcomes
- 2.1.5 campus locations and facilities, equipment and learning resources available to students
- 2.1.6 the details of any arrangements with another provider, person or business who will provide the course or part of the course
- 2.1.7 indicative tuition and non-tuition fees, including advice on the potential for changes to fees over the duration of a course, and the registered provider's cancellation and refund policies
- 2.1.8 the grounds on which the overseas student's enrolment may be deferred, suspended or cancelled
- 2.1.9 the ESOS framework, including official Australian Government material or links to this material online
- 2.1.10 where relevant, the policy and process the registered provider has in place for approving the accommodation, support and general welfare arrangements for younger overseas students (in accordance with Standard 5)
- 2.1.11 accommodation options and indicative costs of living in Australia.

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - RTO website: <https://www.atmc.edu.au/> (accessed on 14 July 2020)
  - Student handbook
  - International student course guide 2020
  - Course brochure:

- *CHC50113 Diploma of Early Childhood Education and Care*
  - *ICT50118 Diploma of Information Technology*
  - *ICT80115 Graduate Certificate in Information Technology and Strategic Management* (draft).
  - Written agreement templates:
    - *CHC50113 Diploma of Early Childhood Education and Care*
    - *ICT50118 Diploma of Information Technology*
  - Terms and conditions document
  - Fees and refund policy document
  - Interview with Compliance Manager, Ms Natalie Robinson regarding Skills First funding.
- The organisation's pre-enrolment documentation omits the following information which it is obligated to provide to prospective students regarding its courses and/or education services:
    - Implications of Skills First Funding. During the audit, Compliance Manager, Ms Natalie Robinson advised that students eligible to receive Skills First Funding complete a different written agreement that includes information on Skills First Funding; however, no further evidence has been received during audit to support this statement.
  - Review of the organisation's pre-enrolment documentation found that it contains inaccurate information for prospective students regarding its courses and/or education services. For example, but not limited to:
    - CHC50113 Diploma of Early Childhood Education and Care*
    - ICT50118 Diploma of Information Technology*
    - the prerequisite/entry requirements required to enroll in the qualifications above. The course brochures, training and assessment strategies, and ACSF Entry Requirement document reference different levels of Language, Literacy, and Numeracy (LLN) levels. As such, it is unclear what the entry requirements are for a student to be able to enroll in the qualifications above.

#### *Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*  
*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - RTO website: <https://vet.atmc.edu.au/lln-english-requirements/> (accessed on 8 September 2020)
  - Attachment 5.3. CHC50113 Diploma of Early Childhood Education and Care\_International Flyer - UPDATED
  - Attachment 5.4. ICT50118 Diploma of Information Technology\_International Flyer – UPDATED
  - Attachment 6.1. AD107.b\_Student Written Agreement\_SF
  - Attachment 6.2. Completed Written Agreement - Bo Xia
  - Attachment 6.3. CHC50113 Diploma of Early Childhood Education and Care\_Domestic
  - Attachment 6.4. ICT50118 Diploma of Information Technology\_Domestic
  - Attachment 6.5. AD128.a\_Application for Enrolment\_SF\_v1.20\_fillable
  - Attachment 6.6. ATMC SF LOF v2.20.
- The organisation has addressed the non-compliance for future students.

## **Support and Progression**

### **Support**

#### **National Code Standard 6.1**

**Original Finding: *Not compliant***

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

**The registered provider must support the overseas student in adjusting to study and life in Australia by giving the overseas student information on or access to an age and culturally appropriate orientation program that provides information about:**

- 6.1.1 support services available to assist overseas students to help them adjust to study and life in Australia**
- 6.1.2 English language and study assistance programs**
- 6.1.3 any relevant legal services**
- 6.1.4 emergency and health services**
- 6.1.5 the registered provider's facilities and resources**
- 6.1.6 complaints and appeals processes as outlined in Standard 10 (Complaints and appeals)**
- 6.1.7 requirements for course attendance and progress, as appropriate**
- 6.1.8 the support services available to assist students with general or personal circumstances that are adversely affecting their education in Australia**
- 6.1.9 services students can access for information on their employment rights and conditions, and how to resolve workplace issues, such as through the Fair Work Ombudsman.**

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

*ICT80115 Graduate Certificate in Information Technology and Strategic Management*

- The following evidence was reviewed:
  - ATMC orientation program PowerPoint.
- The organisation's orientation program omits the following information which it is obligated to provide to students regarding adjustment to study and life in Australia:
  - Any relevant legal services
  - Employment rights and conditions.
- The organisation's orientation program has not been tailored for its student cohort. While it is acknowledged that both the organisation, and Sheila Baxter Training Centre Pty. Ltd (RTO code: 7030) share the same resources, the orientation program solely refers to Baxter Institute.

*Analysis of additional evidence*

*CHC50113 Diploma of Early Childhood Education and Care*

*ICT50118 Diploma of Information Technology*

- The following additional evidence was reviewed:
  - 22158 - ATMC - Audit Response Summary.pdf
  - 7.1.1 ATMC\_Online Orientation PPT\_July 2020.pptx
  - 7.1.2 ATMC Baxter Orientation PPT\_August 2020.pptx.
- The organisation has addressed the non-compliance for future students.