

**2010**

**NATIONAL STRATEGIC INDUSTRY AUDIT**

**TAA40104 Certificate IV in Training and Assessment**

**WESTERN AUSTRALIA  
FINAL REPORT**

**June 2010**

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## CONTENTS

1. Executive Summary	2
2. Background	5
3. Methodology	5
4. Findings and Issues	7
5. Overall Findings	9
6. Recommendations	10
7. Appendices	
Attachment 1: RTO Compliance with AQTF Standards Reported As Raw Numbers and Percentages	13
Attachment 2: Narrative Summary of Non-Compliances with AQTF Standards	14

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**2010 NATIONAL STRATEGIC INDUSTRY AUDIT**  
**TAA40104 Certificate IV in Training and Assessment**  
**WESTERN AUSTRALIAN REPORT**

## **1. Executive Summary**

The objectives of the National Strategic Industry Audit (NSIA) were to:

- Analyse trends in the uptake and delivery of units from the TAA40104
- Identify and analyse key areas of compliance and non-compliance with the *AQTF Essential Standards for Registration*
- Determine the level of non-compliance with the *AQTF Essential Standards for Registration*
- Identify key issues impacting on training and assessment outcomes and good practice
- Provide comment on whether systemic challenges, including those raised in previous NSIAs, also impact on the delivery of training
- Recommend strategies to address key issues and to strengthen the quality of training and assessment of the TAA40104 nationally.

25 Western Australian (WA) RTOs were identified for the audit sample on the basis of nationally agreed criteria and the results of a preliminary online survey of the RTOs. 24 RTOs were audited due to the fact that one RTO voluntarily relinquished the qualification from its scope of registration.

The audit sample included a range of RTO types and sizes, funding sources, delivery locations and methods, client groups and number of enrolments. Other parameters included the date of the last audit and the audit outcome.

The audits were conducted by 5 auditors from the WA audit panel during March 2010. Auditors were instructed to interview at least one TAA40104 trainer/assessor, one CEO or delegate and at least 4 students.

The audits focussed on two units of competence *TAADEL404B Facilitate work based learning* and *TAAASS402C Assess competence* and involved the assessment of compliance with Standards 1, 2.2, 2.3, 2.4 and 3.2.

The audit found a wide variation in the level of compliance. 50% of the RTOs audited were compliant with the Standards and provide a first class program and support services to learners. The other 50% who were found to be non-compliant had issues with learning and assessment strategies and evidence gathering tools that do not meet the requirements of the training package and poor record keeping systems.

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Other main findings of the audit include:

- The highest level of non-compliance was with **Standard 1.5: assessment, including RPL meets the requirements of the training package and workplace requirements and is conducted in accordance with principle of assessment and rules of evidence;**
- inadequate, inaccurate or out of date course information provided to students;
- Fees were in the range of \$1500 - \$7,800 for the full qualification; per unit fees range between \$200 per unit for RPL and \$350 per unit for face-to-face delivery; and fees for distance delivery were between \$1,500 and \$2,500;
- Substantial variation in the duration of training for the TAA40104 – this varied from 8 consecutive days to up to 2 years involving mixed-mode delivery.
- A number of the RTOs are sole proprietor or small RTOs with TAA expertise vested in the one trainer/assessor, who may also be the CEO and administrator;
- A number of the RTOs receive Productivity Placements Program (PPP) funding for delivery to jobseekers and existing workers;
- There is some confusion about what ‘industry’ means for the RTOs who are in business of delivering the TAA40104;
- Evidence of lack of systematic collection, analysis and acting on information to improve on training and assessment
- Evidence of inadequate record keeping systems and administrative processes.
- Evidence of inadequate validation of assessment strategies/tools or moderation of assessment outcomes

One RTO which offered the qualification through RPL and online delivery was found to be critically non-compliant. Students from that RTO who were interviewed expressed confusion about the content of units delivered online, had difficulty understanding what they were required to provide for assessment and had difficulty getting access to trainers/assessors for mentoring and support.

Only 5 (21%) of the 24 RTOs in the audit sample had partnership arrangements with other RTOs for the delivery and assessment of the qualification. All 5 RTOs were compliant with Standard 3.2.

The audit also identified examples of good practice, which include:

- A peer support system for learners enrolled in the qualification which is of benefit to the students and strengthens the relationships between different areas of the organisation;
- Several instances of great learning and assessment strategies involving delivery in small blocks + on-the-job components; the qualification was delivered over a period of time with ample intervals between blocks and a two-year maximum completion timeframe; and
- Strong commitment to student support and flexible student-centred arrangements which respond to the needs of individual learners.

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Recommendations to address the findings of the WA audit.

#### Recommendation 1: Transition Strategy – TAA40104 to TAE40110

RTOs applying to add the TAE40110 to their scope of registration provide evidence to support their application. Evidence must include:

- Training and assessment strategy
- List of training and assessment staff with evidence of the TAA qualification and vocational competence
- Details of partnership arrangements with individuals or organisations

A risk assessment in line with the AQTF National Guideline for Risk Management is conducted for all applications.

#### Recommendation 2: New RTOs

RTOs applying to put the TAE40110 on scope for the first time should be required to provide a business case demonstrating the viability of running the qualification. This would be in line with new AQTF 2010 arrangements which acknowledge the need to differentiate between providers with a proven track record and those that are new to the industry.

#### Recommendation 3: Ongoing audit strategy

TAE40110 remains the ongoing focus of WA audits in 2010/2011. Any audits conducted will include the TAE40110 if the RTO has the qualification on scope and will focus on:

- Assessment strategies, tools and practices, including RPL arrangements
- Distance and online delivery and assessment arrangements
- Opportunities provided in course for real workplace experience
- Records of evidence gathered for assessment decisions leading to the award of qualifications and statements of attainment

#### Recommendation 4: Use it or lose it

If an RTO does not commence delivery of the qualification within 6 months of approval, the qualification should be removed from scope. The RTO will need to reapply when it is in a position to commence delivery.

#### Recommendation 5: Training Accreditation Council Communication Strategy

It is recommended that TAC communicate the outcomes of the strategic audit and the transition arrangements from TAA40104 to TAE40110 to RTOs and other stakeholders through:

- publication of the audit reports and information on transition arrangements on the TAC website
- advice on the transition arrangements in the *TAC Update* newsletter
- attendance at workshops, network meetings and forums
- inclusion in information sessions conducted for prospective RTOs

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## Recommendation 6: Ongoing professional development

The TAC Secretariat approach the Department of Training and Workforce Development to gain commitment to the establishment of strategies aimed at supporting the continuous professional development of trainers and assessors through:

- Professional development workshops facilitated by highly experienced trainers and assessors
- Communities of practice arrangements to develop and share professional expertise, particularly in assessment
- Validation and moderation networks for consensus and benchmarking of assessment judgements

These strategies support the Department's Workforce Development Strategy objectives of attracting, developing and retaining skilled staff for the training sector. (*Training WA: Planning for the future 2009 – 2018*, p.12).

## **2. Background**

At the time of the National Strategic Industry Audit in December 2009, the National Training Information System (NTIS) identified 112 Western Australian Registered Training Organisations (RTOs) which had the TAA40104 Certificate IV in Training and Assessment qualification on their scope of registration.

The audits involved an assessment of each RTO's compliance with the AQTF Standards 1, 2.2, 2.3, 2.4 and 3.2. They focussed on two units of competence *TAADEL404B Facilitate work based learning* and *TAAASS402C Assess competence*

The WA auditors' brief included reporting on the *Conditions of Registration* if identified through risk assessment, or if non-compliances were identified during the site visit.

It is difficult to report on trends in relation to the TAA40104 due to the fact that insufficient data is collected annually to enable analysis of trends from one year to another. The data that may be available is unreliable or cannot be used for the purpose of this strategic audit.

## **3. Methodology**

The National Training Information System (NTIS) identified 112 Western Australian Registered Training Organisations (RTOs) who have the TAA40104 Certificate IV in Training and Assessment qualification on their scope of registration. All 112 RTOs were sent an email explaining the NSIA with a link to an online survey. 93 of the 112 RTOs (83%) responded to the survey. They reported the following enrolments and award of qualifications for 2009:

Enrolments:

- 4,856 learners enrolled in the full qualification
- 2,751 learners enrolled in skill sets or one or more units

Awards:

- 2694 full qualifications issued
- 2359 statements of attainment issued

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The criteria agreed for the selection of the audit sample included:

- A range of RTO types, including private, public, enterprise and community-based RTOs
- A range of funding sources, including public recurrent and specific purpose funding, full-fee paying overseas and fee-for-service
- Inclusion of metropolitan and regional delivery locations
- A range of delivery methods, including face-to-face, flexible, online and distance
- A range of client groups, including jobseekers, private and public sector employees; international student visa holders; offshore international clients and offshore Australian clients
- Learning pathways, including full TAA40104 qualification; RPL only; RPL+ gap training; and skills sets or clusters
- Partnership arrangements with other organisations.

Other factors used to determine the audit sample included:

- RTO's risk rating
- Period since the TAA40104 was last audited; and
- Method and outcome of that audit.

25 WA RTOs were selected in the audit sample on the basis of the nationally agreed criteria and the results of the preliminary online survey of all RTOs scoped to deliver the TAA40104. One RTO voluntarily relinquished the qualification from its scope of registration, resulting in audits of 24 WA RTOs. This represents 21% of all WA registered RTOs with the qualification on scope.

The audit sample included 17 private providers, two TAFE colleges, three non-government organisations; one community based adult education provider and one 'other – not classified elsewhere'. Two RTOs in the sample were located in regional WA.

Three RTOs in the audit sample delivered in other states and one RTO delivered to interstate and overseas clients. There were no audits of interstate RTOs operating in WA.

13 RTOs funded the delivery of the TAA40104 qualification through Fee for Service arrangements; four RTOs received Public Recurrent funding and five RTOs received Public Specific Purpose funding.

17 RTOs delivered the TAA40104 face-to-face on their own or clients' premises; four RTOs offered online delivery and 3 offered distance mode; 3 RTOs offered all modes of delivery.

Audits were conducted by 5 auditors from the WA audit panel. One of the auditors attended the national auditor briefing/moderation workshop held in Melbourne on 14-15 January 2010.

Auditors who were unable to attend the Melbourne workshop were provided with a detailed brief for the audits in their audit assignment documents and had the opportunity to discuss the audits at the Auditors' Forum held by the Training Accreditation Council Secretariat on 26 February 2010.

Audits of the 24 RTOs in the sample were conducted as site visits during March 2010. Auditors were instructed to:

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- Interview at least 1 TAA40104 trainer/assessor at RTO site audit
  - Interview at least 1 CEO or suitable delegate of the RTO during the audit
  - Track, interview and report on at least 4 students using the national student interview tool; the sample included current students (just commenced or about to complete studies) and students who have graduated.

In addition to the site visit audits, an employer satisfaction survey was conducted. This involved online surveys of two distinct groups of RTOs who employed graduates of the TAA40104:

- RTOs that do not have the TAA40104 qualification on scope of registration – the survey was sent to 64 WA registered RTOs delivering in a wide range of industry areas and 32 responses were received, representing a 50% response rate
- RTOs that have the TAA40104 qualification on scope of registration – the survey was sent to the same 112 WA registered RTOs who received the initial online survey and 64 responses were received, representing a 57% response rate.

The audits involved an assessment of each RTO's compliance with the following **AQTF Essential Standards for Registration** as identified by the project steering committee:

- **Standard 1:** 1.1, 1.2, 1.3, 1.4, 1.5 (all Elements)
- **Standard 2:** 2.2, 2.3, 2.4
- **Standard 3:** 3.2.

The audits focussed on two units of competence from the TAA40104:

- TAADEL404B Facilitate work based learning
- TAAASS402C Assess competence

#### 4. Findings and Issues

The results of the audit indicate the following:

- 8 (33%) of the 24 RTOs in the sample were fully compliant in all the Standards audited
- 4 RTOs (17%) were compliant, with opportunities for improvement; and
- 12 RTOs (50%) were found to be non-compliant in at least one of the AQTF Standards.

The highest level of non-compliance was with **Standard 1.5: assessment, including RPL meets the requirements of the training package and workplace requirements and is conducted in accordance with principle of assessment and rules of evidence.**



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All 24 RTOs in the sample were found to be compliant with **Standard 2.3**: *employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.*

Only one RTO in the sample was found to be non-compliant against **Standard 2.4**: *learners receive training, assessment and support services that meet their individual needs.* This RTO delivers the qualification primarily through online learning and was also found to be critically non-compliant against the AQTF Standards. The audit finding noted that on the basis of the evidence reviewed a critical adverse impact on learners and other clients has occurred or is occurring.

RTO compliance and non-compliance against each of the AQTF Standards is provided at **Attachment 1**.

A narrative summary of the non-compliances against each of the AQTF Standards is provided at **Attachment 2**.

The audit also clearly shows that in some cases the course information provided to students is inadequate, inaccurate or out of date and RPL guidance information does not clearly explain the evidence required for assessment

In one instance the trainer/assessor was issued the TAA40104 by the employing RTO through an RPL process, but the RTO was unable to provide evidence of assessment judgements which led to the issue of the qualification, thus raising issues of conflict of interest.

A number of the providers audited are sole proprietor or small RTOs with TAA expertise vested in the one trainer/assessor who may sometimes also be the CEO and administrator. This leaves little time to dedicate to the real work of training and assessment and supporting learners, and even less time for moderation/validation or ongoing professional development.

A wide range of fees were reported for the delivery of the TAA40104.

- Fees for face-to-face programs were in the range of \$1,500 to \$7,785
- Fees per unit ranged from \$200 per unit for RPL to \$350 per unit for face-to-face delivery
- Fees for distance delivery ranged between \$1,500 and \$2,500
- One RTO charged \$2,200 for a 7-day Productivity Placements Program (PPP) funded program for both face-to-face and distance modes
- Another RTO charged \$4020 for one-on-one delivery over a 6-month self paced program with mentoring and support

A number of RTOs reported accessing PPP funding for delivery to jobseekers and existing workers. A couple of RTOs who delivered only to internal staff did not charge fees.

One of the RTOs audited runs the TAA40104 primarily via online delivery, supported by a telephone mentoring, commercial learning resources, in-house developed assessment resources and an RPL guidance booklet they had developed for students.

The RTO claimed a clustered approach to assessment, however its training and assessment strategy documents did not reflect this approach and no evidence was provided of mapping

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to demonstrate that all aspects of the qualification were covered. Assessment tools used and evidence gathered did not sufficiently cover the critical aspects nor the required knowledge and skills as specified in the Training Package.

Information on the RTO's website was out of date. Course information provided to students was inadequate and did not explain the clustered assessment strategy, or the requirement to gather evidence from the workplace.

Students who were interviewed complained that it often took days before they could access a trainer/assessor for tutoring /mentoring support. They expressed confusion about the content of units delivered online and difficulty understanding what they were required to provide for assessment.

The audit found a wide range in the duration of training for the TAA40104, including:

- 4 units delivered in 5 days; 6 design and develop units in 3 days
- 50 hrs for contract training for PPP funded existing workers and jobseekers
- 8 consecutive days of training and 3 months to complete assessment activities
- 10 days over a period of 5 weeks, followed by up to 6 months self-paced learning
- 1 day per week for 12-16 weeks
- 12 months mix of face-to-face and own work
- Up to 2 years, 6 months of which is funded

Most of the RTOs audited indicated they did have interaction with industry; however, comments noted by auditors in relation to the type of interaction and with whom it is occurring appear to contradict this. There were some references to attendance at Curriculum Advisory Group (CAG) meetings, and it should be noted that those networks were disbanded in mid-2009.

A couple of RTOs made references to 'shared internet with other regional RTOs' as their interaction with industry. Some indicated that they used surveys and email contact with clients to seek advice and feedback. Others referred to IBSA, WA Industry Training Council and Trainer and Assessor Network as their 'industry'. This indicated confusion about what 'industry' means for those in the training and assessment provider business.

Only 5 (21%) of the 24 RTOs in the audit sample had partnership arrangements with other RTOs for the delivery and assessment of the qualification. Those 5 RTOs were all found to be compliant in relation to monitoring of services provided on their behalf.

Examples of good practice noted during the audits include:

- A peer support system for learners enrolled in the qualification which is of great benefit to the students and strengthens the relationships between different areas of the organisation
- Several instances of great learning and assessment strategies involving delivery in small blocks + on-the-job components delivered over a period of time with ample intervals between blocks and a two-year maximum completion timeframe

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- Strong commitment to student support and flexibility to respond to the needs of individual learners

The audit found that the highest level of non-compliance was with AQTF Standard 1.5. This finding is consistent with previous strategic audits and points to a systemic challenge in relation to assessment. There is an indication that because assessment is poorly understood, it is not well practiced or taught. As a consequence, a vicious cycle is created that perpetuates the non-compliance in this area.

Course duration is another area where there is some evidence of a systemic challenge. Some RTOs complained about 'other' RTOs who offered the qualification in '3 days'

As a result of the NSIA, a couple of the RTOs audited are considering removing the qualification from scope once their current cohort of learners has completed the qualification.

## 5. Overall Findings

The audit found overall that there is a wide range in the level of compliance. At one end of the spectrum, some RTOs are fully compliant with the Essential Standards audited, have the confidence of their learners and have an ongoing commitment to quality through dedicated trainers and assessors and well established continuous improvement processes.

At the other end of the spectrum, there are RTOs which are struggling to understand the requirements of the qualification, particularly in relation to learning and assessment strategies and evidence gathering tools which meet all the requirements of the TAA40104.

50% of the RTOs in the sample are compliant with the AQTF Standards, some with opportunities for improvement in areas that do not impact directly on the quality of training. The other 50% of the audit sample was found to be non-compliant in at least one of the AQTF Standards

It was noted that a number of the RTOs found to be non-compliant had been granted registration between 2006 and 2009, and were therefore fairly recent entrants to the training provider industry. Additionally, most of these RTOs had had the TAA40104 added to scope in the last 12 – 18 months. These observations could indicate that inexperienced providers have a greater risk of non-compliance with the TAA40104.

The audit data suggests that not a lot of validation of assessment strategies/tools or moderation of assessment outcomes is occurring. This means that assessment judgements are made in isolation without recourse to any external benchmarks or feedback mechanisms, which has a major impact on the quality of assessment.

The other main finding from the NSIA is the issue of inadequate record keeping systems and administrative processes. Non-compliant RTOs in particular had difficulty providing evidence of how assessment judgements are arrived at, which again raises questions about validity of assessments and the qualifications issued.

Issues raised about the qualification by the RTOs who were audited include:

- concerns about the very short duration of delivery by some RTOs
- delivery of the qualification to people for whom it wasn't intended

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- programs are too theory based – some RTOs not providing for workplace experience or workplace related assessment evidence in their programs
  - overlaps and duplications in the content of the units of competency – some RTOs are hoping the revised qualification will correct that issue
  - high turnover of trainers and assessors, which creates issues with continuity and quality of delivery for students
  - need for resources to support delivery and assessment

All RTOs in the audit sample confirmed awareness of the review and development of TAE10. Most indicated a good understanding and working knowledge of the revised training package. Some had only a basic understanding.

Sources of information about the new training package included newsletters, club networks, involvement in the consultation and development phases, attendance at IBSA workshops and IBSA website.

RTOs provided limited information about planning for the transition to the TAE10. Activities planned included notifying students, meetings and consultations. A couple of RTOs were considering whether to maintain the qualification on scope.

Some RTOs were looking forward to TAE10 in anticipation that the duplications and overlaps in the current TAA40104 would be corrected. Others were concerned that industry would want the new qualifications immediately and there were issues about how to respond quickly to that demand.

## **6. Recommendations**

The following recommendations and strategies to address the findings of the WA audit are presented to the Training Accreditation Council for consideration:

### Recommendation 1: Transition Strategy – TAA40104 to TAE40110

The audit found that 50% of RTOs were non-compliant in at least one Standard, and the highest level of non-compliance was with AQTF Standard 1.5. In light of this finding, it is recommended that:

- a) RTOs applying to add the TAE40110 to their scope of registration provide evidence to support their application. Evidence must include:
  - Training and assessment strategy
  - List of training and assessment staff with evidence of the TAA and vocational competence
  - Details of any partnership arrangements with individuals or organisations
- b) All applications are risk assessed in line with the national Risk Management Guidelines

This will enable the TAC Secretariat to undertake a risk assessment of RTOs based on current evidence, which could including a site visit audit if appropriate, before approvals are granted for the addition of TAE40110 to scope.

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### Recommendation 2: New RTOs

The audit found that a number of the non-compliant RTOs were granted registration between 2006 and 2009, and were fairly recent entrants to the VET industry. Most of these RTOs had had the TAA40104 added to scope in the 12 -18 months prior to the audit. This could indicate that RTOs that are relatively new training providers are likely to have a greater risk of non-compliance with the TAA40104.

It is recommended that RTOs applying to put the TAE40110 on scope for the first time be required to provide a business case demonstrating the viability of running the qualification. This would be in line with new arrangements under AQTF 2010 which acknowledge the need to differentiate between providers with a proven track record and those that are new to the training industry.

### Recommendation 3: Ongoing audit strategy

It is recommended that the TAE40110 remain the ongoing focus of TAC audits in 2010/2011. Any audits conducted will include the TAE40110 if the RTO has the qualification on scope and will focus on:

- Assessment strategies, tools and practices, including RPL arrangements
- Opportunities provided in course for real workplace experience
- Online delivery and assessment
- Records of evidence gathered for assessment decisions leading to the award of qualifications and statements of attainment

### Recommendation 4: Use it or lose it

Some of the RTOs surveyed had not commenced delivery of the TAA40104 even though they had had the qualification on scope for the last 6-12 months. An RTO's circumstances are likely to have changed during that period, for example the trainer/assessor may no longer be employed there and the RTO may no longer meet the requirements for having the qualification on scope.

It is recommended that if an RTO does not commence delivery of the qualification within 6 months of approval, the qualification should be removed from scope. The RTO will need to reapply when it is in a position to commence delivery. This will ensure that RTOs apply to add the qualification to scope when they are ready to commence delivery and have confirmed that it is viable to run the program.

### Recommendation 5: TAC Communication Strategy

It is recommended that TAC communicate the outcomes of the strategic audit and the transition arrangements from TAA40104 to TAE40110 to RTOs and other stakeholders through:

- a) publication of the audit reports and information on transition arrangements on the TAC website;
- b) advice on the transition arrangements in the *TAC Update* newsletter;
- c) attendance at workshops, network meetings and forums; and

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- d) inclusion in information sessions conducted for prospective RTOs.

#### Recommendation 6: Ongoing professional development

The audit finding that the highest level of non-compliance was in Standard 1.5 is consistent with previous strategic audits and points to a systemic challenge in relation to assessment.

It is recommended that the TAC Secretariat approach the Department of Training and Workforce Development to gain commitment to the establishment of strategies aimed at supporting the continuous professional development of trainers and assessors through:

- Professional development workshops facilitated by highly experienced trainers and assessors
- Communities of practice arrangements to develop and share professional expertise, particularly in assessment
- Validation and moderation networks for consensus and benchmarking of assessment judgements

These strategies support the Department's Workforce Development Strategy objectives of attracting, developing and retaining skilled staff for the training sector. (*Training WA: Planning for the future 2009 – 2018*, p.12). It is also recommended that the outcomes from the national report on the NSIA of the TAA40104 are taken into consideration prior to acting on this recommendation, in the event that a national professional development strategy is developed.

## RTO Compliance with AQTF Standards Reported as Raw Numbers and Percentages

Standard		No. of compliant RTOs	No. of non-compliant RTOs	(%) of non-compliant RTOs
1.1	The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment	21	3	13%
1.2	Strategies for training and assessment meet the requirements of the relevant Training package or accredited course and are developed in consultation with industry stakeholders	22	2	8%
1.3	Staff, facilities, equipment, and training and assessment materials used by the RTO are consistent with the requirements of the Training package or accredited course and the RTO's own training and assessment strategies	21	3	13%
1.4	Training and assessment are conducted by trainers and assessors who:			
	(a) have the necessary training and assessment competencies at least to the level being delivered or assessed	21	3	13%
	(b) have the relevant vocational competencies at least to the level being delivered or assessed	19	5	21%
	(c) continue developing their vocational and training and assessment competencies to support continuous improvements in delivery of the RTO's services	21	3	13%
1.5	Assessment, including Recognition of Prior Learning (RPL):			
	(a) meets the requirements of the relevant Training package or accredited course	14	10	42%
	(b) is conducted in accordance with the principles of assessment and the rules of evidence	14	10	42%
	(c) meets workplace and, where relevant, regulatory requirements	19	5	21%
2.2	Before clients enrol or enter into a contract, the RTO informs them about the training, assessment and support services to be provided	22	2	8%
2.3	Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment	24	0	0%
2.4	Learners receive training, assessment and support services that meet their individual needs	23	1	4%
3.2	The RTO monitors training and/or assessment services provided on its behalf to ensure that they comply with all aspects of the AQTF 2007 <i>Essential Standards for Registration</i>	*5	0	*0%

\*19 of the 24 RTOs did not have partnership arrangements so were not audited against Element 3.2

## Narrative Summary of Non-Compliances with AQTF Standards Audits

STANDARD	ISSUE	REASON
1.1	Continuous improvement by collecting analysing and acting on relevant data	<ul style="list-style-type: none"> <li>No evidence of systematic collection, analysis and acting on information to improve on training and assessment</li> </ul>
1.2	Learning and assessment strategies	<ul style="list-style-type: none"> <li>Learning and assessment strategy not developed – difficult to make overall assessment of how things fit together</li> <li>No evidence of consultation with industry stakeholders</li> <li>Documented learning and assessment strategies do not cover all the requirements of the qualification</li> </ul>
1.3	Staff facilities, equipment and training and assessment materials	<ul style="list-style-type: none"> <li>Assessment strategies /materials do not enable collection of evidence that meets requirements of the qualification</li> <li>No evidence of moderation of assessment judgements or validation of assessment tools/strategies – unable to ensure consistency</li> </ul>
1.4	Competency of trainers and assessors	<ul style="list-style-type: none"> <li>No evidence of TAA competencies of nominated trainers/assessors</li> <li>No evidence of vocational/industry competence of trainer with TAA40104 qualification</li> <li>No evidence of continuing professional development</li> </ul>
1.5	Assessment, including RPL meets Training Package, workplace and regulatory requirements, principles of assessment and rules of evidence	<ul style="list-style-type: none"> <li>Assessments do not meet the Training Package rules of evidence or principles of assessment</li> <li>Records of evidence which provide the basis of judgement about competence do not include critical aspects of evidence, required skills and knowledge</li> <li>Evidence gathering tools and judgement processes do not enable confirmation of mandatory requirements of the units of competence audited</li> <li>Insufficient evidence to support assessment decisions</li> <li>Assessment evidence records missing</li> <li>Students reported training was mostly theory – no practical on the job assessment component</li> </ul>
2.2	Before clients enrol or enter into a contract, the RTO informs them about the training, assessment and support services to be provided	<ul style="list-style-type: none"> <li>No evidence of information to clients about learning, assessment and support services and their rights and obligations prior to enrolment</li> <li>Course information and guidance to learners do not reflect the documented learning and assessment strategy</li> </ul>



STANDARD	ISSUE	REASON
3.2	The RTO monitors training and/or assessment services provided on its behalf to ensure that they comply with all aspects of the AQTF 2007 <i>Essential Standards for Registration</i>	*19 of the 24 RTOs audited did not have partnership arrangements so were not audited against Element 3.2. The 5 RTOs who did have partnership arrangements were found to be compliant
3.3	Accuracy and integrity of RTO records	<ul style="list-style-type: none"> <li>• Inadequate administrative systems and process, resulting in poor record keeping – no evidence to substantiate how compliance is achieved</li> <li>• Inadequate record keeping – student records of competence not available at audit; conflicting information about what was assessed and what evidence was collected</li> <li>• Omissions and gaps in student records – no basis for award of qualification</li> </ul>