

PQS Compliance Audit

Audit Report (Certificate 3 Guarantee | Higher Level Skills)

SUPPLIER		ATTACHMENT 1	
Registration Code	0427		
RTO	Sarina Russo Schools Australia Pty Ltd T/A Sarina Russo Institute		
Address	100 Eagle Street, Brisbane City		
PARTICIPANTS			
Lead Auditor	Kylie Harris	Auditor(s)	Cassandra Cowley
Auditor Phone	(07) 3034 4884		
Supplier	Ms Kathleen Newcombe, Chief Executive Officer Ms Kim Walsh, VET Coordinator Ms Jane Roberts, RTO Director Ms Christine Russell, Academic Director		
AUDIT DETAILS			
Date(s)	14 – 15 December 2016		
Location	100 Eagle Street, Brisbane City		
PQS Agreement(s)	QS100592 and QS101463		
Type	Monitoring <input type="checkbox"/>	Re-audit <input checked="" type="checkbox"/>	
Outcome	Compliant <input type="checkbox"/>	Not Compliant <input checked="" type="checkbox"/>	
Funding Program(s)	Certificate 3 Guarantee <input checked="" type="checkbox"/>	Higher Level Skills <input type="checkbox"/>	
Policy(-ies)	2016-17 <input checked="" type="checkbox"/> 2015-16 <input checked="" type="checkbox"/>	2016-17 <input type="checkbox"/> 2015-16 <input type="checkbox"/>	
Notes: It was evident at audit that the supplier had made improvements within its processes and systems to rectify a number of non-compliances identified at the previous audit. The supplier expressed its commitment to meeting its compliance obligations whilst ensuring a quality outcome to the students.			
Qualification Code	Qualification	Number of Students Sampled	
CHC30212	Certificate III in Aged Care	5	
BSB30415	Certificate III in Business Administration	9	

ASSESSMENT

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

For each competency for each student the supplier has retained evidence:

- | | | |
|-------------------------------------|-------------------------------------|--|
| <input checked="" type="checkbox"/> | <input type="checkbox"/> | to support competency had been achieved (AVETMISS Outcome identifier 20). (PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | to support that students have attempted all assessments and failed in at least one method (AVETMISS Outcome identifier 30). (PQS Policy 15-16, 16-17 Appendix 6, Table 4) |
| <input type="checkbox"/> | <input type="checkbox"/> | to support recognition of prior learning (AVETMISS Outcome identifier 51). (PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | resubmitted AVETMISS data to remove any previous AVETMISS Outcome identifier 40 claims for payment where the supplier has subsequently submitted a claim for payment for the same student reporting an outcome which would pay 100% (for example, AVETMISS Outcome identifiers 20, 30 and 51) and does not have approval from the department (PQS Policy 15-16, 16-17 Appendix 6, Table 4) |
| <input type="checkbox"/> | <input checked="" type="checkbox"/> | to support gap training for non-equivalent units within a transition from a superseded qualification where a unit of competency had been successfully completed under the old qualification, but the superseded competency does not map directly into the new competency, therefore requiring additional training delivery (department Outcome identifier 65). (PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4) |

Non-compliancesBSB30415 Certificate III in Business Administration

The supplier offers this qualification through its online Learning Management System, with support being provided to students through email or phone contact, or the incorporation of feedback against each assessment instrument. For assessment which requires the selection of correct response/s by the student, the system has the functionality to incorporate the appropriate marking guide which allows for the student to acquire an immediate outcome on the completed assessment instrument.

There were instances where the response/s provided by the student were deemed to be incorrect by the system; and the result had been overridden by the trainer who deemed the response to be correct, without available evidence on how the trainer ensured that the student successfully met this requirement through another assessment method (i.e. verbally). This issue only occurred across a single question in an assessment instrument for students [REDACTED] (two units of competency), [REDACTED] (two units of competency), [REDACTED] (one unit of competency), [REDACTED] (one unit of competency) and [REDACTED] (one unit of competency); therefore, was not deemed to be a systematic issue.

CHC30212 Certificate III in Aged Care

Whilst evidence was sighted of completed assessment instruments for each of the sampled students, the associated marking guide did not correspond to the instrument, making it difficult to determine the sufficiency of the evidence. In discussions with the supplier, it was advised that the assessment instruments had been purchased through a commercial entity and had been contextualised to suit the supplier; however, the mapping guides had not been similarly modified. This contextualisation has allowed for inconsistencies between the two documents.

To further complicate the assessment process, the associated Training and Assessment Strategy developed by the supplier enabled the trainer to identify the appropriate tasks for each student to complete, as "all tasks map to unit of competency; therefore, students are not required to undertake each and every task". The supplier provided a mapping document to provide context on how the tasks meet the requirements of the units of competency.

In addition, in review of the completed assessment instruments on the student files, it was identified that the provided responses contained similarities to the associated marking guide across the range of sampled students. In discussions with the supplier, it was identified that the trainer conducted the assessment as a group based activity, rather than individually as required in accordance with the assessment instructions. Further, review of evidence provided identified that the assessment responses bore similarities within the initial activities of each assessment tool, and then differed as the assessment progressed, suggesting that the majority of the activities were undertaken on an individual basis.

Whilst it was evident that a significant amount of work had been undertaken by each of the sampled students, it would appear that the conduct of the assessment for this qualification has not been undertaken in such a way to support a robust assessment process. Based on the evidence provided, and supported by the employment outcomes achieved by the sampled students, the abovementioned non-compliances for the CHC30212 Certificate III in Aged Care will be referred to the Australian Skills Quality Authority (ASQA).

Rectification Required

The supplier must implement a process to ensure the full range of assessment evidence, which addresses both the theory and practical skills requirements for the unit of competency, is being retained and validated prior to the submission of any future claim for payment. The supplier must ensure all assessments are marked, signed and dated by the assessor and there must be clear evidence to support the assessment outcome. Sufficient evidence must be collected (and retained) demonstrating how a student has been determined competent against all the assessment criteria in a unit of competency.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

Opportunity for Improvement

It is recommended that the supplier review its assessment instruments to ensure that the associated instructions to the student and the trainer support and guide an effective assessment process. For example, in the instance with multiple-choice questioning, the supplier consider indicating the number of responses required (i.e. select two correct responses); in the instance of self-study, the supplier could consider incorporating an instruction to ensure that the associated activities are undertaken individually.

TRAINING

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- ☒ ☐ records of each student's participation in training for each unit of competency, including records of the commencement of educational content, attendance and progression. *(PQS Agreement, Clause 9)*
This must include:
- date of training,
 - location of training,
 - hours of training for that date (e.g. 2pm-5pm),
 - unit/s of competency – trainer's name and signature, and
 - student's name and signature.

AVETMISS Reporting Requirements

The supplier has retained evidence:

- ☒ ☐ to support the student's participation in the learning activity prior to withdrawing (AVETMISS Outcome identifier 40). *(PQS Agreement, Clause 9) (PQS Policy 15-16, 16-17 Appendix 6, Table 4)*

Achieve a minimum outcome for students

The supplier can demonstrate it:

- ☐ ☒ maintains a strong industry and employer networks to deliver training that directly links to local job vacancies and employment outcomes. *(PQS Policy 15-16, 16-17 Performance Standard 5A)*

Vocational Placement

The supplier has, where vocational or work placement is a mandatory requirement for training in a qualification, retained evidence:

- ☐ ☐ of vocational placement.
☐ ☐ of the quantum of vocational placement.

Non-compliances

Review of the sampled student files for the CHC30212 Certificate III in Aged Care qualification identified that sufficient evidence in the participation in training has not been retained. Specifically, the class rolls sighted on the student files did not capture the signature of the student or the trainer, nor the times in which the student attended training. Whilst this issue is a non-compliance for the majority of the students sampled within the CHC30212 Certificate III in Aged Care qualification, the supplier is advised the non-compliance results in recovery for student [REDACTED] and the claims made under the AVETMISS Outcome identifier '40'.

The supplier is advised that the non-compliance relating to the AVETMISS Outcome identifier '40' for student [REDACTED] as outlined above, and detailed within Attachment 2, constitute "Overpayments" as defined in Clause 8.1 of the Pre-qualified Supplier Agreement and the department will seek recovery of this overpayment.

Rectification Required

The supplier is to review and revise its planning and administrative processes to ensure it keeps records of each student's participation in training and assessment for each unit of competency. The record for the participant in training must include:

- date of training
- location of training
- hours of training for that date (e.g. 2pm – 5pm)
- unit/s of competency
- trainer's name and signature
- student's name and signature.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

ADMINISTRATIVE

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

Records

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- ☐ ☐ a copy of the qualification(s) and statement(s) of attainment issued to each student. (PQS Agreement, Clause 9)

The supplier provided:

- ☒ ☐ a completed and accurate assessor's marking guide, criteria and observation checklists for each unit of competency. (PQS Agreement, Clause 9)
- ☐ ☐ evidence to support credit transfers (AVETMISS Outcome identifier 60). (PQS Policy 15-16, 16-17 Appendix 4 E – Credit Transfer, Appendix 6 - Table 4)

PQS Obligations

The supplier has:

- ☒ ☐ retained evidence it has referred each funded student to any applicable fact sheet for the relevant Program published on the department's training website (PQS Policy 15-16, 16-17 Performance Standard 1F)

The supplier has retained evidence it provided information up front regarding:

- ☐ ☐ a breakdown of all costs including how and when fees will be charged and collected at the unit of competency level (PQS Policy 15-16, 16-17 Performance Standard 1, Appendix 1H)
- ☐ ☐ training timelines, delivery mode and delivery location (C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)
- ☐ ☐ vocational/work placement when this is a mandatory component of the qualification (C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)
- ☐ ☐ support services available to assist students to complete training (C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)
- ☒ ☐ a requirement to complete a student employment survey within three months of completing or discontinuing the qualification or skill set (C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)

The supplier has:

- ☒ ☐ retained evidence it informed prospective students they will no longer be eligible for a government subsidised training place under the Certificate 3 Guarantee once they complete a certificate level III qualification (PQS Policy 15-16, 16-17 Performance Standard 1) **C3G ONLY**
- ☐ ☒ retained evidence it informed prospective students they would no longer be eligible for a government subsidised training place under the Higher Level Skills program once they complete a certificate level IV or higher qualification (PQS Policy 15-16, 16-17 Performance Standard 1) **HLS ONLY**

Refunds

The supplier has:

- ☐ ☐ a refund policy. (PQS Policy 15-16, 16-17 Performance Standard 1C)
- ☐ ☐ provided each prospective student a copy of, or provided access to, its refund policy (PQS Policy 15-16, 16-17 Performance Standard 1C)
- ☐ ☐ issued refunds as per its refund policy and retained supporting evidence.

Demonstrate professional and ethical standards of behaviour

The supplier has:

- ☐ ☐ complied with all departmental policies and directives in relation to the proper promotion and marketing of a program; including not advertising, marketing or promotion to consumers any gift or inducement an enrolled student would be eligible to receive upon enrolment (PQS Policy 15-16, 16-17 Performance Standard 2D)
- ☐ ☐ ensured that appropriate avenues exist for students (and/or employers where applicable) to make complaints and that business processes are in place to resolve any complaints in a timely and fair manner (PQS Policy 15-16, 16-17 Performance Standard 2G)

Non-compliances

In accordance with the observation noted within the Assessment section of this report, it was identified that the marking guides provided for the CHC30212 Certificate III in Aged Care qualification did not directly align with the assessment evidence sighted on the sampled student files. The supplier was utilising a variety of methods to provide pre-enrolment information; for example reference to the supplier website within its enrolment form, a system-generated email from its Learning Management System, or a personalised email which provided all necessary information to the prospective/enrolling student.

For students [REDACTED] and [REDACTED], evidence to verify that each student had been referred to any applicable factsheet for the relevant program was not available. Whilst evidence was sighted of students being referred to the 'Conditions of Enrolment' located on the supplier's website, it was identified that information specific to the Certificate 3 Guarantee program was not evident within this section. Whilst there is relevant information on the funded program on its website, no direct referral is made to students to ensure that they have read and understood this information.

It is noted that the supplier has implemented a process to administer the student training and employment survey through Survey Monkey. In addition, it was noted that the supplier is pro-active in the collection of the survey from its students, including implementing a follow-up process to capture any individuals who have yet to complete the survey. While evidence was sighted of completed student employment surveys, it was identified that these have been completed outside of the three month timeframe. In discussions with the supplier, it was identified that this was as a result of a misinterpretation of the 'Student Training and Employment Survey Factsheet'.

Whilst evidence was provided across the majority of the sampled students to support that the supplier had informed prospective students that they will no longer be eligible for a government subsidised training place after the completion of a certificate level III qualification, evidence had not been captured to verify this advice for student [REDACTED]

Rectification Required

The supplier is to ensure that it has a completed and accurate assessor marking guide, criteria and observation checklists for each unit of competency.

The supplier is to ensure that it revises its induction process to enable evidence to be retained to validate the following information, as required by the Certificate 3 Guarantee Program Policy, is provided to all students as part of the enrolment process:

- refer each funded student to any applicable factsheet for the relevant Program published on the department's training website
- a requirement to complete a student training and employment survey within three months of completing or discontinuing the qualification
- evidence to support that it informed prospective students they will no longer be eligible for a government subsidised training place under the Certificate 3 Guarantee once they complete a certificate level III qualification.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

Opportunity for Improvement

It is recommended the supplier implement a standard process to provide pre-enrolment information to its students, to ensure individuals can make informed decisions on their study options, and to enable the consistent capturing of evidence. In addition, the supplier implementing a more robust checking process to ensure that the highest school level completed information is provided by its students upon enrolment.

ELIGIBILITY

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

The supplier has retained evidence it has:

- ☒ ☐ used the Apprenticeships Info Self Service (AISS) to verify eligibility for each student. *(PQS Policy 15-16, 16-17 Performance Standard 3C)*
- ☐ ☐ implemented and used other supporting processes of integrity to verify eligibility for each student. *(Evidence Guide for Pre-qualified Suppliers 2016-17)*
- ☐ ☒ verified any specific restrictions for enrolment in a qualification outlined in the Queensland Training Subsidies List. *(PQS Policy 15-16, 16-17 Performance Standard 3C)*

Training Eligibility

The supplier has assessed prospective student's eligibility and retained evidence each student:

- ☐ ☐ was aged 15 years or above and no longer at school (with the exception of VET in School students). *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- ☒ ☐ permanently resided in Queensland. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- ☐ ☐ was an Australian citizen, an Australian permanent resident (including humanitarian entrants), a temporary resident with the necessary visa and work permits on the pathway to permanent residency, or a New Zealand citizen. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- ☐ ☒ completed Year 12 in Queensland and have commenced training within 12 months of graduating Year 12 (i.e. by the end of the calendar year after completing Year 12). *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)* **YEAR 12 GRAD ONLY**
- ☒ ☐ did not already hold a certificate level III or higher level qualification, nor be enrolled in a certificate level III or higher level qualification not including qualifications completed at school and foundation skills training. *(C3G Program Policy 15-16, 16-17)* **C3G ONLY**
- ☐ ☒ did not already hold a certificate level IV or higher level qualification, nor be enrolled in a certificate level IV or higher level qualification; not including qualifications completed at school and foundation skills training (other exceptions applicable). *(HLS Program Policy 15-16, 16-17)* **HLS ONLY**

Subsidy Availability

The supplier has retained evidence each student, who at the time of enrolment, claimed concessional student status: *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17) (PQS Policy 15-16, 16-17 Appendix 1K)*

- ☐ ☐ a) held a Health Care concession card or Pensioner Concession Card issued under Commonwealth law, and/or
- b) was the partner or a dependent of a person who held a Health Care Card or Pensioner Concession Card and is named on the card, and/or
- c) provided the Supplier with an official form under Commonwealth law confirming they, their partner, or the person of whom the student is a dependent, is entitled to concessions under a Health Care Card or Pensioner Concession Card, and/or
- d) is an Aboriginal and/or Torres Strait Islander, and/or
- e) was enrolled in a VETiS program, and/or
- f) had a disability, and/or
- g) was an adult prisoner

Non-compliances

Whilst evidence was provided to support that the supplier conducted AISS searches on the majority of the sampled students prior to enrolment, evidence to support the AISS search was not available for student [REDACTED]. In discussions with the supplier, it was advised that, while a search had been conducted, evidence was not retained in this instance.

Evidence to support eligibility as a Queensland resident for student [REDACTED] was not provided. Whilst the supplier had retained a copy of [REDACTED] photo ID, the image of the front of the card was not legible.

An opportunity was afforded to allow for the supplier to gather this evidence and provide a response subsequent to the site visit component of the audit; however, further evidence was unable to be provided due to the unavailability of the student. Therefore, the evidence provided by the supplier did not verify that [REDACTED] met the eligibility criteria for the Certificate 3 Guarantee program.

The supplier is advised that the non-compliance relating to the eligibility criteria as outlined above, and detailed within Attachment 2, constitute "Overpayments" as defined in Clause 8.1 of the Pre-qualified Supplier Agreement and the department will seek recovery of these overpayments.

The supplier enrolled a student, [REDACTED], into the BSB30415 Certificate III in Business Administration qualification; however, [REDACTED] holds a previous qualification. At the time of audit, this issue was discussed with the supplier and it was noted that the supplier conducted an AISS search as per its process, in which nothing was identified. In addition, the enrolment form completed by the student did not self-identify that a previously held qualification was applicable. The supplier was made aware of [REDACTED] previously held qualification when further claims were submitted for payment; however, were rejected. The supplier advised that discussions had been held with the department's Contract Management and Performance unit, who has advised to convert the student over to a fee-for-service arrangement, given that the enrolment for the previous qualification was dated prior to the enrolment with the supplier. Given that the supplier followed its process and exercised due diligence to determine the student's eligibility, recovery will not be sought for [REDACTED] in this instance.

Rectification Required

The supplier is to ensure that it retains evidence to demonstrate that the appropriate AISS search has been undertaken on each student prior to enrolment.

The supplier is to co-ordinate with its Contract Manager to ensure that AVETMISS data is amended to remove the funding source for student [REDACTED].

The supplier is to ensure that sufficient, appropriate and legible evidence is being retained to validate the eligibility of students prior to the commencement of training within the Certificate 3 Guarantee Program, and prior to any claim for payment being submitted to the department.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

FEES

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

The supplier has:

- ☒ ☐ disclosed prior to enrolment all co-contribution fees (inclusive of all essential training costs) for both concessional and non-concessional students for each qualification it is approved to deliver under the program. *(PQS Policy 15-16, 16-17 Performance Standard 1A - B, Appendix 1F)*
- ☐ ☐ published its concessional and non-concessional fees schedule to its website, labelled as the co-contribution fee *(PQS Policy 15-16, 16-17 Performance Standard 1A, Appendix 1F)*
- ☐ ☐ charged and collected a co-contribution fee for each student, and the fee was paid by the student, employer or a third party and was not paid or waived by the supplier. *(PQS Policy 15-16, 16-17 Appendix 1H - I)*
- ☐ ☐ charged and collected Student Contribution Fees at the unit of competency level. *(PQS Policy 15-16, 16-17 Appendix 1H)*
- ☐ ☐ not advertised fee free training. *(C3G Program Policy 15-16, 16-17) (HLS Program Policy 15-16, 16-17)*
- ☐ ☐ not charged for a qualification or offering in addition to the co-contribution fee. *(PQS Policy 15-16, 16-17 Appendix 1)*
- ☒ ☐ not charged co-contribution fees for units with an AVETMISS Outcome identifier of 60 or for (department Outcome identifier 65). *(PQS Policy 15-16, 16-17 Appendix 1L)*

Non-compliances

The supplier utilises a variety of methods to provide pre-enrolment information; for example reference to the supplier website within its enrolment form, a system-generated email from its Learning Management System, or a personalised email which provided all necessary information to the prospective/enrolled student.

Whilst evidence was sighted of the supplier disclosing all co-contribution fees prior to enrolment for a number of the sampled students, it was identified that evidence to support this disclosure was not sighted for students [REDACTED].

It was noted at the time of audit that the supplier has amended its process to ensure that the disclosure of all co-contribution fees occurs through its enrolment form and referencing to the supplier website; therefore, no further rectification action is required.

In review of the evidence to support the AVETMISS Outcome identifier '60' outcome for sampled student for the CHC30212 Certificate III in Aged Care qualification, that the supplier had charged fees for the unit of competency HLTAID003 *Provide first aid*. This non-compliance impacts students [REDACTED].

In discussions with the supplier, it was advised that an external provider was to conduct the training and assessment services on the supplier's behalf, with the supplier to issue the Statement of Attainment. The supplier was then to submit a claim into the department as an AVETMISS Outcome identifier '20'.

However, this arrangement was not conducted as agreed, and the external provider issued the Statement of Attainment instead. Given that invoices for co-contribution fees are issued and paid at the commencement of training, students have subsequently been charged for a unit of competency which has been acknowledged as a credit transfer.

Rectification Required

The supplier must ensure that co-contribution fees are not charged to students for units of competency resulting as an AVETMISS Outcome identifier '60'. The supplier must ensure that the appropriate refund for the co-contribution fee for unit of competency HLTAID003 *Provide first aid* is processed for the impacted students.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

Opportunity for Improvement

The supplier update its website to reflect all qualifications listed on its delivery schedule. Should the supplier not be currently accepting enrolments in any of these qualifications, it is recommended that appropriate notations to reflect this is included. Should the supplier not intend on delivering any of the qualifications listed on its delivery schedule, it is to contact it's the departments Contract Management and Performance unit, in order to seek removal of these qualifications.

LOWER LEVEL / FOUNDATION SKILLS

☐ Compliant ☐ Not Compliant ☒ Not Examined

N/C N/A

The supplier has:

- ☐ ☐ retained evidence to support the delivery of lower-level training to eligible students. (PQS Policy 15-16, 16-17 Performance Standard 4)
- ☐ ☐ retained evidence to support the delivery of foundation skills training (i.e. language, literacy and numeracy). (PQS Policy 15-16, 16-17 Performance Standard 4)

Where the supplier has delivered LLN and/or foundation skills training, it retained evidence:

- ☐ ☐ it ensured foundation skills training delivered to a student was preceded by effective assessment of the student's LLN proficiency skills as defined in Performance standard 4. (PQS Policy 15-16, 16-17 Performance Standard 4B)
- ☐ ☐ it undertook, prior to the commencement of training, an informed analysis of each student's capabilities by assessing his/her knowledge and skills against recognised foundation skills benchmarks and the judgement was made against the skills required for entry to and completion of the vocational qualification. (PQS Policy 15-16, 16-17 Performance Standard 4B)
- ☐ ☐ it customised the competencies required for the desired vocational qualification. (PQS Policy 15-16, 16-17 Performance Standard 4B)
- ☐ ☐ it considered documented evidence of the student's history (i.e. previous education and training, work history, impairments, disabilities). (PQS Policy 15-16, 16-17 Performance Standard 4B)

- ☐ ☐ It developed a training and support plan that outlined how the foundation skills training that were to be delivered and the foundation skills outcomes that were to be achieved through to completion of the vocational qualification. (PQS Policy 15-16, 16-17 Performance Standard 4B)
- ☐ ☐ the student supported his/her training and support plan and learning pathway. (PQS Policy 15-16, 16-17 Performance Standard 4B)
- The supplier has retained evidence, when enrolling disadvantaged learners in lower-level qualifications, it developed a training and support plan:
- ☐ ☐ tailored to the individual's circumstances and abilities. (PQS Policy 15-16, 16-17 Performance Standard 4)
- ☐ ☐ that included learning support strategies. (PQS Policy 15-16, 16-17 Performance Standard 4)
- ☐ ☐ that included an upfront skills assessment that identified the learner as disadvantaged and requiring lower-level vocational training (other than foundation skills/LLN training) prior to certificate III enrolment. (PQS Policy 15-16, 16-17 Performance Standard 4)
- Where the supplier had provided subsidised lower-level qualifications (excluding delivery to VETiS students) it has:
- ☐ ☐ retained evidence industry or local employers have supported the qualification as the preferred employment outcome (Industry option) (could include including basic trade skills to support entry into a traditional apprenticeship pathway). (C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)
- ☐ ☐ ensured the qualification is mandated as a prerequisite for the certificate III level qualification under training package rules (Qualification option). (C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)
- ☐ ☐ adequately assessed that the student requires this pathway (Individual option). (C3G Program Policy 15-16, 16-17) (Evidence Guide for Pre-qualified Suppliers 2016-17)

AVETMISS DATA

☐ Compliant ☒ Not Compliant ☐ Not Examined

N/C N/A

The supplier retained information and material necessary to provide a complete record of training and assessment, including:

- ☒ ☐ accurate AVETMISS activity start and activity end dates for each student for each unit of competency. (PQS Agreement, Clause 9)

The supplier has:

- ☐ ☐ reported the Delivery mode identifier specified in AVETMISS for the relevant delivery mode. (PQS Policy 15-16, 16-17 Appendix 4D)
- ☐ ☐ reported the Outcome code identifier specified in AVETMISS for the relevant outcome. (PQS Policy 15-16, 16-17 Appendix 4D and Appendix 6, Table 4)
- ☐ ☐ reported the student's eligibility for concession. (PQS Policy 15-16, 16-17 Appendix 4D and Appendix 6, Table 3))
- ☐ ☐ reported the correct amount of co-contribution fees collected per unit of competency (rounded to the nearest dollar). (PQS Policy 15-16, 16-17 Appendix 4D, Appendix 8 – Table 6)
- ☒ ☐ reported AVETMISS postcodes that accurately reflect the location in which the majority of training has been undertaken. (PQS Policy 15-16, 16-17 Appendix 4D and E Location loadings)
- ☐ ☐ reported the postcode and location where the training was coordinated for online delivery (PQS Policy 15-16, 16-17 Appendix 4D and E Location loadings)
- ☒ ☐ not submitted claims for payment for units in excess of the competency count for the qualification. (PQS Policy 15-16, 16-17 Appendix 5B and Appendix 7 – Table 5)
- ☐ ☐ not submitted claims for payment for units of competency previously assessed as competent. (PQS Policy 15-16, 16-17 Appendix 4E and Appendix 7 – Table 5)
- ☐ ☐ It correctly granted and reported any unit of competency available for credit transfer. (PQS Policy 15-16, 16-17 Appendix 4E, Appendix 6 - Table 4)
- ☐ ☐ reported the correct fund source code for the student and Program (PQS Policy 15-16, 16-17 Appendix 4D, Appendix 6 Tables 1-3)
- ☒ ☐ reported the student's highest level of school and year completed (PQS Policy 15-16, 16-17 Appendix 4D)
- ☐ ☐ reported, within 30 days, the qualification issued flag when the student had successfully completed all requirements of a recognised qualification and the supplier has issued the qualification (PQS Policy 15-16, 16-17 Appendix 4D, Appendix 8 Table 6)

Non-compliances

Review of the student files for [REDACTED] identified that the AVETMISS activity end date reported for the unit of competency *BSBDIV301 Work effectively with diversity* were inconsistent with the evidence sighted on the respective file; that being, the final judgement of competence was dated a number of months after the claim had been submitted into the department for payment.

Review of the student file for [REDACTED] identified that the issued BSB30415 Certificate III in Business Administration qualification and its associated units of competency do not address the qualification packaging rules. Whilst the correct number of units has been undertaken, the packaging rules state that seven (7) units must be selected from Group A. In the case of [REDACTED], only six (6) were undertaken and completed within this group selection. In order for the student to fulfil the requirements specified within the qualification packaging rules, the supplier would be required to provide further training under a fee-for-service arrangement for a unit of competency which has been selected within Group A.

In addition, this non-compliance relates to the incorrect issuance of a qualification, and a referral to the Australian Skills Quality Authority (ASQA) will be made in this instance.

AVETMISS postcodes were inaccurately reported for all students sampled within the CHC30212 Certificate III in Aged Care qualification. As training occurs at the location of the workplace, the supplier is required to ensure that the postcode for these locations are recorded and reported.

The supplier failed to acknowledge an instance of credit transfer which resulted in a duplicate claim to be reported for the following student:

- [REDACTED] – *CHCCS411C Work effectively in the community sector*.

At the time of audit, the duplicate claim was discussed with the supplier, whom agreed that credit transfer for the effected unit of competency should have been acknowledged. The supplier is advised the non-compliance relating to the duplicate claim as outlined above, and detailed within Attachment 2, constitute "Overpayments" as defined in Clause 8.1 of the Pre-qualified Supplier Agreement and the department will seek recovery of this overpayment.

Rectification Required

The supplier must ensure it accurately reports the AVETMISS activity start and end dates for each unit of competency. In addition, the supplier must ensure it identifies and reports the AVETMISS postcode which accurately reflects the location in which the majority of training is undertaken for each student.

The supplier must have a process in place to ensure competencies delivered align with the relevant qualification packaging rules. In addition, the supplier must ensure that it acknowledges units of competency which have previously been assessed as competent.

The supplier will not be required to submit evidence to the department to demonstrate non-compliances have been sufficiently addressed. However, rectification action must be immediately undertaken (unless otherwise advised by the lead auditor) to address all identified non-compliances and will be examined as part of future audit or monitoring activity.

All documents are available online at: www.training.qld.gov.au.