



**Australian Government**  
**Australian Skills Quality Authority**

# REPORT

## **Audit report: Skills Generation Pty Ltd**

Date/s of audit: 28/11/2017

Date report created: 29/11/2017



## Organisation details

Organisation's legal name:	Skills Generation Pty Ltd
Trading name/s:	Skills Generation
RTO number:	41008
CRICOS number:	N/A

## Audit team

Lead auditor:	Bert Hese
Assistant/s:	N/A

## Audit details

Application number/s:	N/A	
Audit number:	AUDREC0000408	
Audit reason	Post initial VET	
Address of site/s visited:	Unit 17/1 Newspaper Place Maroochydore 4558	
Date/s of audit:	28/11/2017	
Organisation's contact for audit:	Leonie Murray	Co Owner
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## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Bert Hese

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

## Background

Summary of organisation and management structure:

- Skills Generation Pty Ltd was registered as an RTO on 24 August 2014. The RTO currently has a organisational structure that comprises of the CEO, operations manager, compliance manager, administrative manager, 3 administrative staff and contract trainers and assessors.

Scope of registration:

- see attached

Suburb and state of all delivery locations:

- The RTO delivers predominately in Queensland but also offers training Australia wide.

Third party usage:

- The RTO currently has a number of third party agreements in place for the recruitment and delivery of training and assessment across a range of qualifications.

Core clients/target groups:

- The core client group is existing workers mainly in the community services sector; however the RTO also delivers training and assessment to school leavers and job seekers.

Training Revenue (Funded or fee for service):

- Training and assessment is usually under certificate III guarantee funding and fee for service.

Total number of current enrolments as at audit date:

- 271

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 Skills Generation Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Skills Generation Pty Ltd
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Skills Generation Pty Ltd conducted on 28/11/2017.
- Other publically available information - including but not limited to, information published on the organisation's and third party websites.

## Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
CHC52015	Diploma of Community Services	Mixed	27
BSB51915	Diploma of Leadership and Management	Mixed	6
CHC40413	Certificate IV in Youth Work	Mixed	123
ACM30612	Certificate III in Pet Grooming	Face to face	0
CHC33015	Certificate III in Individual Support	Mixed	61

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

## Interviewees

Name	Position	Training products
Leonie Murray	Co Owner	CHC52015, BSB51915, CHC40413, ACM30612, CHC33015
David Bradford	Trainer & Assessor	CHC52015, BSB51915, CHC40413
Emily Myatt	Trainer & Assessor	ACM30612
Michelle Knight	Trainer & Assessor	CHC33015
Bruce Bell	CEO	



## About this Report

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

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

Correcting 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

## Action required by RTO

Skills Generation Pty Ltd did not meet all requirements for clauses 1.1, 1.2, 1.8, 2.3, 4.1, 5.2 and 8.2

Remedial action is required for the following clauses and training products:

- **ACM30612 Certificate III in Pet Grooming**  
ACMGAS207A Provide reception services for an animal care facility
- **CHC52015 Diploma of Community Services**

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

### Clause 4.1

- all information whether disseminated directly or by the RTO or on its behalf by third parties is now accurate and factual and addresses all of the requirements specified in clause 4.1.
- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students who received marketing that was not accurate and factual. Remedial action needs to cover current students and students who enrolled with your training provider in the past 3 months.

### Clause 5.2

- The RTO now has appropriate systems that are followed to ensure each learner is provided with accurate information that enables them to make an informed decision about undertaking training with your RTO that complies with clause 5.2.
- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students that were not enrolled in appropriate training products. Remedial action needs to cover current students and students who enrolled with your training provider in the past 3 months.

### Clause 1.1 and 1.2

- The RTO has corrected its training and assessment strategy and practices for future students to ensure they meet the requirements of the training product, including the amount of training provided.
- The RTO carried out remedial action to identify and address the impact the non-compliance may have caused learners in the training product sampled that were impacted by training and

assessment practices that did not meet the requirements of the of the training product (including the amount of training) Remedial action need to cover current students who enrolled or completed with your training provider in the past 3 months.

#### Clause 1.8

- The RTO has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied.
- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to students 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 training provider in the past 3 months.

#### Clause 2.3

- The RTO now has appropriate systems that are followed to ensure that in the future, it will notify the Regulator:
  - of any written agreement entered into under Clause 2.3 for the delivery of services on its behalf within 30 days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and
  - within 30 calendar day of the agreement coming to an end.
- The RTO now has a written agreement with each third party that provides services on its behalf.

#### Clause 8.2

- The RTO ensures each third party that provides services on its behalf, that the third party cooperates with the VET regulator
  - by providing accurate and factual responses to information requests from the VET regulator relevant to the delivery of services, and
  - in the conduct of audits and the monitoring of its operations.

## Areas of non-compliance

### Marketing/Recruitment Practices

#### Standards for RTOs Clause 4.1

Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
  - i) a learner will successfully complete a training product on its scope of registration; or
  - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
  - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

#### **Findings: Not compliant**

Evidence provided:

- Review of third party websites
  - Pet Stylist Academy (Animal Magic Holdings)
  - IXL in Training
- Copy of RTO's social media advertising

Information, whether disseminated directly by the RTO or on its behalf, is not both accurate and factual as the NRT and AQF logos have not been used according to the conditions of use for these logos.

A review of third party websites revealed that Pet Stylist Academy and IXL in Training include the NRT and AQF logos, Non RTOs are not permitted to use the NRT or AQF logo.

Social media advertising material provided by the RTO as part of the pre audit evidence is non-compliant as it did not contain the relevant course code, the advertising material only showed the course name.

These practices and behaviours are non-compliant with Clause 4.1 of the *Standards for RTOs 2015*

## Enrolment

### Standards for RTOs Clause 5.1

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.

### Standards for RTOs Clause 5.2

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.

### **Findings: Not compliant**

Evidence provided:

- Review of third party websites
  - Pet Stylist Academy (Animal Magic Holdings)
  - Institute of Pacific Australia
  - IXL in Training

#### Institute of Pacific Australia

The course information on the website did not include any information in relation to work placement requirements for the community services qualifications, specifically who is responsible for organising the placement.

#### IXL in Training

The course information on the website did not include any information in relation to work placement requirements for the community services qualifications, specifically who is responsible for organising the placement.

There is no information on the website that indicates there is a third party arrangement in place and that IXL in Training is delivering training and assessment in partnership with Skills Generation.

These practices and behaviours are non-compliant with Clause 5.2 of the *Standards for RTOs 2015*.



## Training and Assessment

### Standards for RTOs Clause 1.1

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

### Standards for RTOs Clause 1.2

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

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

**Findings: Not compliant**

### ACM30612 Certificate III in Animal Grooming

Evidence provided:

- Training and Assessment strategy

The training and assessment strategy shows that the qualification is delivered intensively over a period of 4 full time weeks not less than 160 hours in total. Discussion with the RTO revealed that in addition to the intensive training learners are required to complete assessment activities in a workbook as part of the assessment requirements for the qualification This is to be done in the learners own time. The amount of time for a learner to complete the required learnings and research in their own time, to enable them to complete the workbook is not reflected in the amount of training.

The amount of training shown in the strategy is insufficient to enable the learner to meet all the requirements of the qualification they are enrolled in and also does not reflect all the modes of delivery.

### CHC52015 Diploma of Community Services

Evidence provided:

- Aotoa - Training and Assessment Strategy
- IOPA - Training and Assessment Strategy

The RTO has a number of training and assessment strategies developed for themselves and the third parties delivering this qualification. The training and assessment strategies for third parties Aotoa Teleaga (Aotoa) and Institute of Pacific Australia (IOPA) do not meet the requirements of this clause.

The above mentioned strategies have entry requirements that:

require potential learners to be recognised as competent in the following units of competency from the qualification CHC40708 Certificate IV in Community Services Work :

- HLTHIR403C Work effectively with culturally diverse clients and co-workers
- CHCCS411C Work effectively in the community sector

or have sufficient relevant experience and knowledge of community work and/or community services to indicate likely success at this level of qualification....

The entry requirements are unrealistic as they include superseded units of competency that potential learners are unlikely to hold or be able to gain. The RTO was aware of the superseded units of competency and advised of their intent to remove these entry requirements from the qualification.

Both third party strategies refer to Industry Skills Council Community Services and Health Industry Skills Council. The industry skills council was replaced by Skills Services Organisation – Skills IQ as of 1 January 2016. Reference to industry skills councils is outdated and needs to be removed or replaced with up to date information.

- IOPA - Training and Assessment Strategy

Training and assessment strategies are not consistent with the requirements of the training product and the practices of the RTO

The strategy reflects each unit of competency was delivered as a stand-alone unit. The RTO advised that units of competency CHCAOD001 Work in alcohol and other drugs context and CHCSOH001 Work with people experiencing or at risk of homelessness are delivered and assessed in a cluster. There was no indication in the strategy that these units were delivered in a clustered arrangement.

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

#### **Standards for RTOs Clause 1.8**

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

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

#### ***Findings: Not compliant***

##### **ACM30612 Certificate III in Pet Grooming**

ACMGAS207A Provide reception services for an animal care facility

Evidence provided:

- Student files for Tracey Masterton and Kayla Eley
- Assessment marking guide

Assessment is not conducted in accordance with the principles of assessment and rules of evidence.

The marking guide contained insufficient guidance to the assessor to enable the assessor make consistent assessments of competency. There was a lack of sufficient guidance to the assessor or a range of acceptable answers/benchmarks for all the assessment tasks.

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

## Regulatory Compliance / Governance

### Standards for RTOs Clause 2.3

The RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.

### Standards for RTOs Clause 2.4

The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and uses these to ensure that the services delivered comply with these Standards at all times.

#### **Findings: Not compliant**

Evidence provided:

- ASQAnet third party report:
- Third party agreement between Skills Generation and The RW Collection Pty Ltd; and
- Conversation with Skills Generation

The RTO has not demonstrated compliance with the requirements of clause 2.3 as:

- The RTO does not have a written agreement with all third parties, that provide services on its behalf, and
- ASQA has not been informed of all written agreements entered into within 30 calendar days of that agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first.

The RTO advised that they utilise Rapid Response First Aid (RTO number 91222) to deliver training and assessment of HLTAID003 Provide first aid to Skills Generation learners. The RTO was unable to provide any evidence of a third party agreement being in place between the RTO and Rapid Response First Aid

The RTO provided a copy of a third party agreement between itself and The RW Collection Pty Ltd for the recruitment of learners and delivery of training and assessment dated 26/10/2016. There is no record of this agreement in the ASQAnet database meaning ASQA has not been advised of this written agreement

These practices and behaviours are non-compliant with Clause 2.3 of the *Standards for RTOs 2015*

### Standards for RTOs Clause 8.2

The RTO ensures that any third party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) in the conduct of audits and the monitoring of its operations.

#### **Findings: Not compliant**

Evidence provided:

- The RTO provided copies of third party agreements between the RTO and
  - Animal Magic Holdings Pty Ltd
  - Aotoa Teleaga
  - Cunnamulla Aboriginal Corporation for Health
  - The Institute of Pacific Australia Pty Ltd
  - IXL in Training
  - The Rural Woman

The written agreements did not contain a clause that the third party is required to cooperate with the VET Regulator:

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) in the conduct of audits and the monitoring of its operations.

These practices and behaviours are non-compliant with Clause 8.2 of the *Standards for RTOs 2015*