



Australian Government
Australian Skills Quality Authority

REPORT

Audit report: Creative's New Edge Pty Ltd

Date/s of audit: 10 and 11/10/2017

Date report created: 27/10/2017



Organisation details

Organisation's legal name:	Creative's New Edge Pty Ltd
Trading name/s:	Australian Healthcare Qualifications and Training
RTO number:	21436
CRICOS number:	N/A

Audit team

Lead auditor:	Jennine Cochrane
Assistant/s:	N/A

Audit details

Application number/s:	INTCRI0000439	
Audit number:	AUDREC0007675	
Audit reason	Application - initial CRICOS	
Address of site/s visited:	6 Slater Parade, East Keilor, VIC, 3033	
Date/s of audit:	11/10/2017	
Organisation's contact for audit:	Mr. Daniel Mastroianni info@australianhealthcareqt.com.au	Chief Executive Officer 0456111225

Original finding at time of audit

Audit finding: Serious non-compliance

Report completed by: Jennine Cochrane

Practice	Standards for RTOs 2015	National Code 2017	Finding
Registration		C12.1.	Not compliant
Registration		C7.1,C7.3, C8.1	Compliant
Registration		C7.2, C10.2	Not audited
Marketing/Recruitment	4.1	D1.2	Compliant
Enrolment	5.1, 5.2, 5.3,	D2.1,D2.2, D3.1, D3.2	Compliant
Enrolment	7.3		Not compliant
Support and Progression	1.7	D6.1, D6.2, D6.3, D6.5, D6.6, D9.1, D9.2, D10.1, D10.2, D11.1-11.6, D13.2	Compliant
Support and Progression		D10.5, D10.6, D11.7 - 11.9	Not audited
Training and Assessment	1.2, 1.14		Compliant
Training and Assessment	1.1, 1.3, 1.8, 1.13, 1.16	D14.1, D14.2	Not compliant
Training and Assessment	1.15, 1.17, 1.18, 1.20		Not audited
Completion	3.1		Not compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	D4.1, D4.3, D4.4. D4.5	Compliant

Background

Summary of organisation and management structure:

- Creative's New Edge Pty Ltd (the applicant) consists of the Chief Executive Officer, Daniel Mastroianni, Kim Slingo, the Compliance Manager, Olivia Comelli the Training Manager, and casual trainers (one at present).

Scope of registration:

- Proposed CRICOS scope of registration is:
 - CHC33015 Certificate III in Individual Support
 - CHC43015 Certificate IV in Ageing Support
 - CHC43115 Certificate IV in Disability.
- Current VET scope (at time of audit) consists of:
 - CHC33015 Certificate III in Individual Support
 - CHC43015 Certificate IV in Ageing Support
 - CHC43115 Certificate IV in Disability.
 - CHC43415 Certificate IV in Leisure and Health
 - HLT33115 Certificate III in Health Services Assistance.

Suburb and state of all delivery locations:

- Intended delivery location is 6 Slater Parade, East Keilor, VIC 3033.
- The RTO delivers to domestic students at 39 Colorado Court, Hallam, VIC 3803.

Third party usage:

- The RTO intends to use Education Agents but had no arrangements in place at time of audit.

Core clients/target groups:

- International students. At present the CEO intends to source students from the Philippines due to connections currently in that country.

Training Revenue (Funded or fee for service):

- The RTO currently receives funding from the Victorian State Government for domestic students
- It is intending to adjust its predominant revenue source to fee-for-service students.

Total number of current enrolments as at audit date:

- 12 students enrolled in *CHC43015 Certificate IV in Ageing Support*.

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

- Information provided directly by Creative's New Edge Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Creative's New Edge Pty Ltd
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Creative's New Edge Pty Ltd conducted on 10/10/2017.
- 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
CHC33015	Certificate III in Individual Support	Mixed: face to face and work placement	0
CHC43015	Certificate IV in Ageing Support	Mixed: face to face and work placement	12
CHC43115	Certificate IV in Disability	Mixed: face to face and work placement	0

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

Interviewees

Name	Position	Training products
Daniel Mastroianna	CEO	All
Kim Slingo	Compliance Manager	All
Olivia Comelli	Training Manager	All

About this Report

This report details findings against the *Standards for Registered Training Organisations 2015* (Standards for RTOs 2015) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2017* (National Code). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting a non-compliance may require:

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

Action required by RTO

Creative's New Edge Pty Ltd did not meet all requirements of:

- **Standards for Registered Training Organisations 2015 (Standards for RTOs 2015)**
 - Clauses: 7.3, 1.1, 1.3, 1.8, 1.13, 1.16, 3.1.
- **The National Code of Practice for Providers of Education and Training to Overseas Students 2017:**
 - Part C Registration on CRICOS Section 12.1
 - Part D Standards for Registered Providers 14.1,14.2

Remedial action is required for the following training products:

- *CHC33015 Certificate III in Individual Support*
- *CHC43015 Certificate IV in Ageing Support*
- *CHC43115 Certificate IV in Disability*

The RTO is required to provide evidence that demonstrates:

Registration on CRICOS

National Code Part C - Section 12.1.

- That it has the capacity for the requested 200 international students as opposed to the identified capacity by the auditor of 190, taking into account the total capacity of its premises at any one time, arrangements for work placement, facilities, resources, equipment, materials and ratio of staff to student numbers.

Enrolment

Standards for RTOs 2015 - Clause 7.3.

- Where the RTO requires students (including both current and prospective students) to pay in excess of \$1500 in advance, either directly or through a third party, the RTO has fee protection arrangements in place that meet the requirements set out in the *Requirements for Fee Protection in Schedule 6* of the *Standards for RTOs 2015*.
- Alternatively, if the RTO no longer requires learners to pay in excess of \$1500 in advance, provide evidence that all documentation advising both current and prospective learners of their fees obligations has been updated to reflect the change in the RTO's fee collection practice.

Training and Assessment

Standards for RTOs 2015 - Clauses 1.1, 1.8

National Code Part D - Standard 14.2.

- The RTO has corrected its proposed training and assessment strategies and practices for each of the sampled training products to ensure all future students meet all of the assessment requirements specified in the CHC Community Services training package.
- The RTO has corrected its assessment system - in particular, its assessment instruments for unit *CHCPAL001 Deliver care services using a palliative approach* and the Work Placement Log Book (relevant to all three qualifications) - to ensure that assessment:
 - a) complies with the assessment requirements of the CHC Community Services training package; and
 - b) is conducted in accordance with the principles of assessment and rules of evidence.
- The RTO has carried and remedial action to identify and address the impact the non-compliance may have caused to learners currently enrolled in *CHC43015 Certificate IV in Ageing Support* that have been either (i) assessed in a manner that did not meet the requirements of Clause 1.8; or (ii) not assessed in a manner that met the requirements of Clause 1.8; and/or (iii) incorrectly assessed as having met the requirements of the training product.

Standards for RTOs 2015 - Clauses 1.3, 1.13

National Code Part D - Standard 14.1.

- The RTO's trainers/assessors for each of the sampled training products meet all of the requirements of the *Standards for RTOs 2015*, and, in particular, have:
 - o the vocational competencies at least to the level being delivered and assessed, and
 - o current industry skills directly relevant to the training and assessment being provided.
- The RTO has implemented its policies and procedures to ensure its staffing resources are adequate and have the capabilities as required by the quality assurance framework, *Standards for Registered Training Organisations 2015*.
- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to learners that have been trained or assessed by the trainer/assessor that did not meet the requirements of the *Standards*. Remedial action needs to cover current students enrolled in the sampled training products.

Standards for RTOs 2015 - Clauses 1.16

- The RTO has developed and implemented appropriate processes to ensure that all trainers and assessors have and will continue to undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

Completion

Standards for RTOs 2015 - Clause 3.1

- The RTO has corrected its assessment system as detailed above in relation to Clause 1.8, to ensure that AQF certification documentation is only issued to learners who have been assessed as meeting the requirements of the sampled training products, as specified in the CHC Community Services training package.

Areas of non-compliance

Enrolment

Standards for RTOs Clause 7.3

Where the RTO requires, either directly or through a third party, a prospective or current learner to prepay fees in excess of a total of \$1500 (being the threshold prepaid fee amount), the RTO must meet the requirements set out in the Requirements for Fee Protection in Schedule 6.

Findings: Not compliant.

The following evidence was reviewed in relation to fee protection:

- CRICOS Policy and Procedure document: Statement on page 47 - 'Payment schedule – An administration fee of \$1,500.00 AUD is required on acceptance of enrolment offer. The remaining of fees are due at commencement of training. Payment plan options are available subject to CEO approval. A payment plan agreement will be negotiated and entered into'.
- Letter of Offer
- Course Outline
- Student Agreement
- Flyer for all three qualifications.

The applicant's proposed practices are not compliant with Clause 7.3 of the *Standards for RTOs 2015* as the RTO was unable to demonstrate that it has, or will have in place, appropriate fee protection measures that meet the *Requirements for Fee Protection* specified in Schedule 6 to the *Standards for RTOs 2015*, where learners are required to prepay fees in excess of a total of \$1500 .

Evidence of non-compliant practice includes:

- The evidence provided indicated that international students will be required to pay \$1500 prior to commencement and the balance outstanding (\$13500) upon commencement in one payment, unless they request to pay in instalments on approval from the CEO. Instalment payment amounts were not specified and not the expected norm. The RTO was unable to demonstrate how it will ensure that student's prepaid fees in excess of \$1500 will be protected in accordance with the *Requirements for Fee Protection* specified in Schedule 6 to the *Standards for RTOs 2015*.

These practices and behaviours are non-compliant with clause 7.1 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.

Findings: Not compliant.

The following evidence was reviewed in relation to training and assessment:

- Training and assessment strategies for:
 - *CHC33015 Certificate III in Individual Support*

- *CHC43015 Certificate IV in Ageing Support*
- *CHC43115 Certificate IV in Disability*
- Assessment resources for the following unit of competency:
 - *CHCPAL001 Deliver care services using a palliative approach* (contained within *CHC43015 Certificate IV in Ageing Support*)
- Assessment resources relevant to all three of the above qualifications:
 - Work placement Journal/Log Book.
 - Refer to evidence specified in Clause 1.8 for details.

The RTO's proposed assessment practices are not compliant with Clause 1.1 of the *Standards for RTOs 2015*, as they are not consistent with the requirements of the CHC Community Services training package and will not enable each learner to meet the requirements for each unit of competency in which they are enrolled.

Evidence of proposed non-compliant assessment practice includes:

- Review of the RTO's assessment instruments for unit *CHCPAL001 Deliver care services using a palliative approach* and the Work Placement Log Book (relevant to all three qualifications), found that they were not valid or reliable and would result in insufficient evidence being collected through the assessment process to support a decision of competence. Refer to the findings detailed at Clause 1.8 in this report.

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

Standards for RTOs Clause 1.3

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment;**
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;**
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and**
- d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.**

National Code Standard D14.1

The registered provider must have and implement policies and procedures to ensure its staffing resources are adequate and have the capabilities as required by the quality assurance framework applying to the course.

National Code Standard D14.2

The registered provider must have adequate education resources, including facilities, equipment, learning and library resources and premises as required by the quality assurance framework applying to the course.

Findings: Not compliant

The following evidence was reviewed in relation to training and assessment resources:

- Training and assessment strategies for the sampled training products
- Training resources - learner guides, classroom activity booklets, PowerPoint presentations, equipment (beds/ lifting equipment/ shower facilities)
- Premises, facilities and lease for 6 Slater Parade, East Keilor VIC 3033
- Evidence as detailed in relation to Clause 1.13

The applicant's proposed practices and behaviours are not compliant with Clause 1.3 of the *Standards for RTOs 2015* and with Standard 14.1 of the *National Code 2017* as the RTO has insufficient trainers and assessors who meet all of the requirements of the *Standards* to deliver the proposed training and assessment.

Evidence of non-compliance includes:

- The applicant's one proposed trainer/assessor did not meet all of the requirements of Clause 1.13. Refer to the findings detailed at Clause 1.13 in this report.

These practices and behaviours are non-compliant with clause 1.3 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

The following evidence was reviewed in relation to assessment:

- *CHC33015 Certificate III in Individual Support*
CHC43115 Certificate IV in Disability
CHC43015 Certificate IV in Ageing Support
 - Workplace Journal/Log Book
- *CHC43015 Certificate IV in Ageing Support*
CHCPAL001 Deliver care services using a palliative approach
 - CHCPAL001 - Assessors Guide - V1.0
 - CHCPAL001 - Assessment kit - V1.0

The RTO's proposed assessment practices are not compliant with the requirements of Clause 1.8 of the *Standards for RTOs 2015*, as review of assessment instruments did not confirm that the RTO will implement an assessment system that ensures assessment:

- a) complies with the assessment requirements of the CHC Community Services Training Package, and
- b) will be conducted in accordance with the principles of assessment and rules of evidence.

Evidence of non-compliant proposed practice includes:

- Review of the RTO's assessment instruments for unit *CHCPAL001 Deliver care services using a palliative approach* and the Work Placement Log Book (relevant to all three qualifications), found that they were not valid or reliable and would result in insufficient evidence being collected through the assessment process to support a decision of competence.
- With reference to *CHC43015 Certificate IV in Ageing Support*
CHCPAL001 Deliver care services using a palliative approach
 - The assessment activities did not comply with the units Performance Evidence requirements of the CHC Community Services training package. That is:

- ‘The candidate must show evidence of the ability to complete tasks outlined in elements and performance criteria of this unit, manage tasks and manage contingencies in the context of the job role. There must be evidence that the candidate has:
 - supported, reported and documented issues and needs of 3 people in palliative care

There were no assessment activities in place to provide for the observation and evidence to demonstrate the student providing support to 3 people in palliative care.

- Assessment conditions were not met. That is:
 - **Skills must be demonstrated in the workplace or in a *simulated environment that reflects workplace conditions*. The following conditions must be met for this unit: modelling typical workplace conditions, including:**
 - typical workplace documentation and reporting processes
 - scenarios and simulations in provision of care using a palliative approach in a range of contexts’

There were no assessment conditions at 6 Slater Parade, East Keilor that reflect workplace conditions and no scenarios and simulations in place to allow for the provision of care using a palliative approach in a range of contexts.

- With reference to all three training products - *CHC33015 Certificate III in Individual Support, CHC43115 Certificate IV in Disability, CHC43015 Certificate IV in Ageing Support*
 - The Workplace Journal/Log Book was not valid, reliable or sufficient. It contained no guidance for the workplace supervisor or the learner about the various activities to be completed in the workplace. It required the learner to record attendance times, dates and activities assigned to them by the workplace but no guidance to ensure activities, relevant to the various units of competency, are allocated and performed by the learner.

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

Standards for RTOs Clause 1.13

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

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

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

Standards for RTOs Clause 1.16

The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

Findings: Not compliant

CHC33015 Certificate III in Individual Support

CHC43115 Certificate IV in Disability

CHC43015 Certificate IV in Ageing Support

The following evidence was reviewed in relation to trainers and assessors:

- Various employment documents – including copies of qualifications, resume, non-accredited training, employment contract - for the RTO’s sole nominated trainer/assessor, Kathleen McCartney, for delivery of the above qualifications to international students.

The RTO's practices in relation to training and assessment are not compliant with the requirements of the *Standards for RTOs 2015*, as the evidence reviewed in relation to the RTO's nominated trainer/assessor did not confirm that the trainer/assessor meets all of the requirements specified in Clause 1.13 of the Standards. In addition, there was insufficient evidence to confirm that the RTO had ensured that the requirements of Clause 1.6 have been satisfied:

Evidence of non-compliance includes:

- The applicant did not provide sufficient evidence to confirm that its current trainer, Kathleen McCartney, who has been delivering *CHC43015 Certificate IV in Ageing Support* throughout 2016, had:
 - the vocational competencies at least to the level being delivered and assessed; and
 - current industry skills directly relevant to the training and assessment being provided. (ref: Clause 1.13 (a) and (b))

Additionally, there was no evidence that the trainer/assessor had undertaken professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment (ref: Clause 1.16).

- The trainer/assessor held superseded qualifications, of which all units of competency are now superseded or deleted in the current qualifications. The trainer/assessor did not hold any of the current units of competency in any of the qualifications to be included on the RTO's CRICOS scope of registration and had not demonstrated equivalence in vocational competency for any of the units.
- In addition, there was no evidence:
 - to support claims of current employment made by the trainer/assessor in relation to industry currency, and
 - of professional development undertaken by the trainer/assessor relating to the fields of knowledge and practice of vocational training, learning and assessment, including competency based training and assessment, since obtaining *TAE40110 Certificate IV in Training and Assessment* in 2014.

These practices and behaviours are non-compliant with clauses 1.13 and 1.16 of the *Standards for RTOs 2015*

Completion

Standards for RTOs Clause 3.1

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

Findings: Not compliant.

The following evidence was reviewed in relation to the certification of learners:

- Assessment tools as detailed for Clause 1.8 for the sampled training products.

Due to the non-compliance identified in relation to Clause 1.8 it could not be confirmed that the RTO will only issue AQF certification to learners assessed as meeting the requirements of the sampled training product as specified in CHC Community Services training package, as required by Clause 3.1 of the *Standards for RTOs 2015*.

Evidence of non-compliance includes:

- The applicant's proposed assessment practices prevent it from issuing AQF certification documentation, to a learner it has assessed as meeting the requirements of the CHC Training Package, because the proposed assessment instruments themselves do not meet the requirements of the CHC Training Package. Refer to non-compliance identified in relation to Clause 1.8.

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

National Code Standard C12.1

As part of the registration approval process the ESOS agency will decide whether to approve the maximum number of students that a provider can enrol. In making this decision, the ESOS agency will consider the capacity of the provider in terms of its premises, approved arrangements with other providers, facilities, resources, equipment, materials and ratio of staff to student numbers.

Findings: Not compliant.

The following evidence was reviewed:

- Application for registration submitted 3/07/2017 by Daniel Mastroianni requested capacity of delivery to following cohorts:
 - Domestic learners - 1000
 - International learners - 200
- Premises at 6 Slater Parade, East Keilor VIC 3033
- Proposed delivery timetables
- Signed Work Placement Agreements.

The proposed number of international students is not supported by information regarding the capacity of the applicant's premises and work placement agreements, and therefore is not consistent with the requirements of Section 12.1 of Part C of the *National Code 2017*.

Evidence of non-compliance includes:

- The capacity of the premises at 6 Slater Parade East Keilor VIC 3033 will not accommodate the number of students identified by the applicant. The applicant applied for a capacity of 1000 domestic and 200 international students. The capacity of the premises is 71 students at any one time on the premises. A total capacity of 190 is calculated, based on the current structure, resources and proposed delivery schedules.
- In addition, the applicant had capacity for placing 53 students in total with host employers for the purpose of the mandatory 120 hours work placement for all three qualifications.

On referral to the Delegate, the RTO was advised that, contingent on successful CRICOS registration, the total approved capacity will be for 100 students. The RTO was also advised that, contingent on successful CRICOS registration, it may apply at a later date for an increase in its capacity of up to 190 students in total for the site, providing it demonstrates it has the capacity to place all 190 students in work placement arrangements.