



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

# REPORT

## **Audit report: Nova428 Pty Ltd**

Date/s of audit: 31 January 2018

Date report created: 6/02/2018



## Organisation details

Organisation's legal name:	Nova428 Pty Ltd
Trading name/s:	Nova College
RTO number:	41187
CRICOS number:	N/A

## Audit team

Lead auditor:	Seth Farrington
Assistant/s:	N/A

## Audit details

Application number/s:	N/A	
Audit number:	AUDREC0000817	
Audit reason:	Post initial	
Address of site/s visited:	77 Lexton Street, STRETTON Qld 4116	
Date/s of audit:	31/01/2018	
Organisation's contact for audit:	Karen Yu	CEO
	Karen@nova.edu.au	0414350096

## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Seth Farrington

Practice	Standards for RTOs 2015	Finding
Marketing/Recruitment	4.1	Compliant
Enrolment	5.1, 5.3	Compliant
Enrolment	5.2	Not compliant
Enrolment	7.3	Not audited
Support and Progression	1.7	Compliant
Training and Assessment	1.1, 1.2, 1.8, 1.13	Not compliant
Training and Assessment	1.3, 1.14, 1.15, 1.16	Compliant
Training and Assessment	1.17, 1.18, 1.20	Not audited
Completion	3.1	Compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	Not audited

## Background

Summary of organisation and management structure:

- The organisation became a Registered Training Organisation on 24 June 2015. The CEO of the organisation is supported by a Student Manager, an Administration Manager, a Training Manager, a Development Manager (who is currently reviewing opportunities in providing non-accredited programs) and a team of contract trainers/assessors.

- Initial delivery commenced June 2016. Since that time the organisation has had four intakes of students – predominately in CHC50113 Diploma of Early Childhood Education and Care.
- The organisation uses the VETtrak student management system.

Scope of registration:

- BSB30415 Certificate III in Business Administration
- BSB51915 Diploma of Leadership and Management (application to withdraw in process)
- CHC30113 Certificate III in Early Childhood Education and Care
- CHC50113 Diploma of Early Childhood Education and Care

Suburb and state of all delivery locations:

- 77 Lexton Street, STRETTON Qld 4116

Third party usage:

- N/A

Core clients/target groups:

- New entrants and those currently working in the applicable industry

Training Revenue (Funded or fee for service):

- Funded – Certificate III Guarantee, Higher skills
- Fee for service. \$3800 – over 3 payments – never more than \$1500

Total number of current enrolments as at audit date:

- 85

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 Nova428 Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Nova428 Pty Ltd
- Information provided to ASQA’s auditors and documentation reviewed during the site audit of Nova428 Pty Ltd conducted on 31 January 2018.
- 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
CHC30113	Certificate III in Early Childhood Education and Care	Mixed	4
CHC50113	Diploma of Early Childhood Education and Care	Mixed	81
BSB30415	Certificate III in Business Administration	Face to face	0

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

## Interviewees

Name	Position	Training products
Karen Yu	CEO	N/A

Guo Ying Ni	Marketing Student Manager	N/A
Jenny Chen	Manager Assistant	N/A
Ken Li	Administration Manager	N/A
Wendy Wen	Director of Nova	N/A
Lee Gane	Training Manager	CHC30113, CHC50113

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## 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

Nova428 Pty Ltd did not meet all requirements for clauses 1.1, 1.2, 1.8, 1.13 and 5.2

Remedial action is required for the following training products:

- CHC30113 Certificate III in Early Childhood Education and Care
- CHC50113 Diploma of Early Childhood Education and Care
- *CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety*

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

Clause 1.1:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- Provide the training and assessment strategies it intends to implement that include:
  - the framework to guide the learning requirements and training and assessment arrangements consistent with the requirements of the CHC Community Services Training Package and enables each learner to meet the requirements of each unit of competency; and
  - includes an appropriate amount of training for each learner cohort.
- The RTO has carried out remedial action to address the impact the non-compliance may have caused to students currently enrolled with the RTO

Clause 1.2:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- Provide, for each training product listed, the training and assessment strategies it intends to implement that demonstrate how the proposed amount of training is sufficient and has been determined based on the prospective learner cohort's existing skills, knowledge and experience and the proposed mode of delivery.
- The RTO has carried out remedial action to address the impact the non-compliance may have caused to students currently enrolled with the RTO

Clause 1.8:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

*CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety*

- Provide evidence for the unit of competency listed above that demonstrates it will implement an assessment system that ensures assessment:
  - complies with the 'Assessment Conditions' of the CHC Community Services Training Package
- The RTO has carried out remedial action to address the impact the non-compliance may have caused to students currently enrolled with the RTO.

Clause 1.13:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- The following trainer/assessor has:
  - current industry skills directly relevant to the training and assessment being provided
    - Fei Yu
- The RTO has carried out remedial action to address the impact the non-compliance may have caused to students currently enrolled with the RTO.

Clause 5.2:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused learners enrolled in the sampled training products who either (i) did not receive all of the information specified in Clause 5.2 prior to the commencement of training and assessment, and/or (ii) received information that was not current and accurate. Remedial action needs to cover current learners.

## Areas of non-compliance

### Enrolment

#### 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**

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

Evidence reviewed:

- Training and assessment strategies for the above qualifications
- Student files reviewed under clause 1.8
- RTO website
- Discussion with RTO representatives at audit

Findings:

Insufficient evidence was provided to confirm that 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 all of the information required by clause 5.2. For example, but not limited to:

- No information was provided concerning the currency of the training product in which the learner is to be enrolled, as published on the National Register;
- Information about work placement arrangements requiring the service to be registered is not clearly articulated to perspective learners;

- Information about requiring learners to purchase text books for the course is not clearly articulated for those on Government funded programs.

**NB:** It should be noted that evidence was provided at audit demonstrated the organisation had rectified the above non-compliances for future students.

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**

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

Evidence reviewed:

- Training and assessment strategies for the above qualifications
- Student files reviewed under clause 1.8
- Discussion with RTO representatives at audit
  
- Identified learner cohort
  - Adults, predominantly female
  - May work full or part time while completing training
  - May have never worked in early childhood education and care industry
  - Current workers in the early childhood education and care industry

Findings:

The RTO's current documented training and assessment strategies for the above qualifications are not compliant with the requirements of the *Standards for RTOs 2015* they do not accurately reflect the RTO's actual practice in delivering the qualification.

For example but not limited to:

- The RTO's documented training and assessment strategies have conflicting information to actual practice concerning the provision of text books. The strategies state these are provided to learners but in actual practice learners are to purchase them.
- Qualification packaging for CHC30113 has omitted the unit CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety.

**NB:** It should be noted that evidence was provided at audit that demonstrated the organisation had rectified the above non-compliances for future students.

The RTO's intended practices with regard to its delivery of the above training products are not compliant with the requirements of the *Standards for RTOs 2015*, as it could not be confirmed that for all learners the RTO will determine an amount of training to be provided consistent with the requirements of Clause 1.2.

For example but not limited to:

- The RTO has not demonstrated how they have determined the proposed amount of training is appropriate for the identified student cohort as identified in the training and assessment strategies.
  - The RTO's learner cohort is broad and will have characteristics across a continuum of skills and experience relevant to CHC30113 and CHC50113 which must impact the

amount of training that would be required. Moreover, the variance in learner skills and experience does not support that a single approach to amount of training is appropriate and will achieve the required rigour and depth of training including for learners new to the early childhood education and care industry.

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

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### **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**

CHC30113 Certificate III in Early Childhood Education and Care  
CHC50113 Diploma of Early Childhood Education and Care  
*CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety*

Evidence reviewed:

- Training and assessment strategies for the above qualifications
- Completed student assessments for SL, TZ, LT, JG and YZ
  - Theory questions
  - Research questions
  - Marking guide
- Master assessment tools
  - Theory questions
  - Research questions
  - Workplace tasks
  - Evidence marking guides
- Discussion with RTO representatives at audit

Findings:

The evidence provided for completed assessment of *CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety* does not address all the training package requirements and does not confirm assessment will be conducted in accordance with the Principles of Assessment and the Rules of Evidence, for the following reasons:

- No evidence was provided to demonstrate for the completed assessments that there was a mechanism that addressed Performance Evidence requirements. Furthermore, there was no mechanism in place that ensured assessment involves the sufficient recording of an assessor's critical analysis of the evidence provided and the specific recording of their judgement based on that critical analysis of evidence – why the evidence suggests/supports competence of the candidate's demonstrated ability concerning the Performance Evidence requirements.

**NB:** It should be noted that evidence was provided at audit that demonstrated the organisation had rectified the above non-compliances for future students.

- No evidence was provided to demonstrate Assessment Conditions are addressed concerning the requirement that assessment must involve persons approved of by relevant local community elders.

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

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**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.

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**Findings: Not compliant**

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

Evidence reviewed:

- Training and assessment strategies for the above qualifications
- Student files reviewed under clause 1.8
- Trainer/Assessor files
- Discussion with RTO representatives at audit

Findings:

The evidence provided did not demonstrate the RTO's training and assessment is delivered only by persons who have:

- current industry skills directly relevant to the training and assessment being provided.
- The evidence provided for trainer/assessor Fei Yu did not demonstrate she has current industry skills directly relevant to the training and assessment being provided for the above qualifications.

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

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