





# REPORT

## Audit report: Central Safety Training and Assessing Services Pty Ltd

RTO number:	32577
CRICOS number:	N/A
Date/s of site visit:	N/A
Date report created:	21/01/2021
Date report updated:	12/03/2021

## Provider details

Provider's legal name: Central Safety Training and Assessing Services Pty Ltd  
Trading name/s: All States Training  
RTO number: 32577  
CRICOS number: N/A

## Audit team

Lead auditor: Judith Keller  
Auditor/s: N/A

## Audit details

Application number: ADDVET0034575  
Audit number: AUDREC0011079  
Audit reason: Application - Change  
Date of opening meeting/discussion: 16/12/2020  
Date of closing meeting/discussion: 16/12/2020  
Provider's contact for audit: De'Anne Daphne Stegert  
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Address/es of site/s visited (if applicable): N/A - Desk.audit

## Summary of audit findings

### Audit finding: Serious non-compliance

Report completed by: Judith Keller

Practice	Standards for RTOs	Finding
Training and Assessment	1.1*, 1.2, 1.3*, 1.8*, 1.9*, 1.11*, 1.13, 1.14, 1.16	Not compliant
Completion	3.1	Compliant
Regulatory Compliance / Governance	8.5*	Not compliant

\*indicates a non-compliant cause

## Summary of audit findings following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 24/02/2021: Minor non-compliance

Report completed by: Judith Keller

Practice	Standards for RTOs	Finding
Training and Assessment	1.1, 1.3, 1.8*, 1.9, 1.11	Not compliant
Regulatory Compliance / Governance	8.5*	Not compliant

\*indicates a non-compliant clause

## Background

### Summary of provider and management structure:

- Central Safety, Training & Assessing Services Pty Ltd, trading as All States Training employs:
  - 3 full time office staff and 1 part time remote office worker
  - 2 full time trainers.

The organisation also engages a number of third parties to provide services on its behalf.

### Scope of provider's registration:

Qualifications as at 13 January 2021

- AHC20116 Certificate II in Agriculture
- AHC20416 Certificate II in Horticulture
- AHC30116 Certificate III in Agriculture
- AHC30716 Certificate III in Horticulture
- AHC30916 Certificate III in Landscape Construction
- AHC32816 Certificate III in Rural Operations
- BSB30115 Certificate III in Business
- CPC10111 Certificate I in Construction
- CPC10120 Certificate I in Construction
- CPP20218 Certificate II in Security Operations
- RII20215 Certificate II in Surface Extraction Operations
- RII20715 Certificate II in Civil Construction
- RII30115 Certificate III in Surface Extraction Operations
- RII30815 Certificate III in Civil Construction Plant Operations
- RII30915 Certificate III in Civil Construction
- RII30919 Certificate III in Civil Construction
- SHB30115 Certificate III in Beauty Services
- SHB30315 Certificate III in Nail Technology
- SHB40115 Certificate IV in Beauty Therapy
- SHB50115 Diploma of Beauty Therapy
- SIT20316 Certificate II in Hospitality
- SIT30616 Certificate III in Hospitality
- TLI40218 Certificate IV in Mobile Crane Operations

Explicit scope units of competency as at 13 January 2021

- AHCPMG304 Use firearms to humanely destroy animals
- AHCPMG311 Use firearms for pest control activities from aircraft
- FWPCOT2237 Maintain chainsaws
- FWPCOT2254 Maintain chainsaws
- HLTAID001 Provide cardiopulmonary resuscitation

- HLTAID002 Provide basic emergency life support
- HLTAID004 Provide an emergency first aid response in an education and care setting
- HLTAID009 Provide cardiopulmonary resuscitation
- HLTAID010 Provide basic emergency life support
- HLTAID012 Provide first aid in an education and care setting
- MSMPER200 Work in accordance with an issued permit
- MSMPER205 Enter confined space
- MSWWHS201 Conduct hazard analysis
- MSWWHS216 Operate breathing apparatus
- MSWWHS217 Gas test atmospheres
- RIIMCP202D Conduct rail despatch operations
- RIIMCU302E Construct and maintain ventilation devices
- RIIMCU302F Construct and maintain ventilation devices
- RIIRIS402D Carry out the risk management process
- RIIRIS402E Carry out the risk management process
- RIIUND207D Conduct underground lifting operations
- RIIUND207E Conduct underground lifting operations
- TLID2004 Load and unload goods/cargo
- TLID3033 Operate a vehicle-mounted loading crane
- TLIF2080 Safely access the rail corridor
- UETTDREL14 Working safely near live electrical apparatus as a non-electrical worker
- UETTDRRF02 Perform pole top rescue
- UETTDRRF03 Perform EWP rescue
- UETTDRRF06 Perform rescue from a live LV panel
- UETTDRRF08 Perform EWP controlled descent escape.

*Accredited course as at 13 January 2021*

- 10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)

*Application to add training products to scope of registration (ADDVET0034575)*

- CPPSEC3101 Manage conflict and security risks using negotiation
- CPPSEC3102 Maintain operational safety and security work environment
- CPPSEC3103 Determine and implement response to security risk situation
- CPPSEC3104 Coordinate monitoring and control of individual and crowd behaviour
- CPPSEC3105 Coordinate provision of quality security services to clients
- CPPSEC3110 Control persons using batons
- CPPSEC3111 Restrain persons using handcuffs
- CPPSEC3114 Control security risk situations using firearms
- CPPSEC3115 Carry, operate and maintain revolvers for security purposes
- CPPSEC3116 Carry, operate and maintain semi-automatic pistols for security purposes
- CPPSEC3117 Carry, operate and maintain shotguns for security purposes
- CPPSEC3118 Inspect and test cash-in-transit security equipment and rectify faults
- CPPSEC3119 Implement cash-in-transit procedures
- CPPSEC3120 Load and unload cash-in-transit in secured and unsecured environments
- CPPSEC3121 Control persons using empty hand techniques
- CPPSEC3122 Plan provision of close protective services
- CPPSEC3123 Implement close protection services.

#### **Suburb and state of all delivery sites:**

- On 17 November 2020 the provider advised the following delivery sites associated with students to whom it had issued statements of attainment within the past 12 months
  - Agnes Waters, Aldgate, Alpha, Aramara, Ardrossan, Auburn, Ayr, Banyo, Bell, Benarby, Benarkin, Berri, Berrimak, Berwick, Biggenden, Biloela, Black River, Bluff, Bohle, Booral, Borroloola, Bowen, Brisbane City, Broadmeadow, Brooklands, Bundaberg, Bunya, Caboolture, Calliope, Cannovale, Capella, Cecil Plains, Charleville, Charters Towers, Childers, Chinchilla, Clare.Clermont, Cloncurry, Coalstoun Lakes, Collinsville, Cooyar, Corinda, D'Aguilar, Darra, Davoren Park, Deepwater, Dudley Park, Dysart, Eagle Farm, Emerald, Eppalock, Everton Hills,

Findon, Gayndah, Gladstone, Goomeri, Gracemere, Gumlow, Gympie, Hervey Bay, Hindmarsh, Home Hill, Injune, Ipswich, Kadanga, Kanigan, Kilcoy, Kingaroy, Kirwan, Kuitpo, Laglan, Laidley, Landsborough, Launceston, Logan Central, Mackay, Maidenwell, Maitland, Maryborough, McArthur, McLaren Vale, Meadowbrook, Melbourne, Melrose Park, Memerambi, Meringur, Middlemount, Mile End, Mingela, Mirani, Mondure, Moranbah, Mount Mee, Moura, Munduberra, Mungar, Murarrie, Murgon, Nanango, Narangba, Nhulunbuy, Noosa Heads, North Lakes, Nuriootpa, Officer, Oxley, Oakhurst, Pialba, Plainland, Proserpine, Proston, Purrawunda, Quilpie, Rainbow Beach, Redbank, Redcliffe, Renmark, Richmond Hill, Riverside, Rochedale, Rockhampton, Roma, Roxby Downs, Rufus, Salisbury, Seaton, Semaphore, Sharon, Shoal Point, South Kolan, Springwood, Strathpine, Tamborine, Tannum Sands, Tarong, Texas, Thargomindah, Tiaro, Tin Can Bay, Toogum, Toowoomba, Townsville, Tumby Bay, Underwood, Virginia, Wacol, Wallumbilla, Wamuran, Wandoan, Warwick, Whitsundays, Whyalla, Wondai, Woorim, Wooroolin, Yatala, Yeppoon, Yirrkala

**Third party usage:**

- The organisation has arrangements in place with approximately 37 third parties to provide services on its behalf, including:
  - delivery of training and/or assessment
  - enrolment of learners
  - recruitment of prospective learners.

**Core clients/target groups:**

- General public/individuals
- Individuals needing to update their qualifications/units of competency for the industry they work in, experienced or required to retain employment
- Experienced individuals wanting to upgrade from current positions and improve job prospects.

**Training Revenue (Funded or fee for service):**

- Fee for service only

Total number of current enrolments in the organisation as at 16/12/2020: 16

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
- information provided directly by Central Safety Training and Assessing Services Pty Ltd to ASQA
- existing information and records held by ASQA concerning Central Safety Training and Assessing Services Pty Ltd
- information provided to ASQA's auditor and documentation reviewed during the desk audit of Central Safety Training and Assessing Services Pty Ltd
- other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Training products sampled

Training Products	Models of delivery/assessment*	Current enrolments
CPP20218 Certificate II in Security Operations	Face to face	0
CPPSEC3101 Manage conflict and security risks using negotiation	Face to face	NIA
CPPSEC3103 Determine and implement response to security risk situation	Face to face	N/A
CPPSEC3104 Coordinate monitoring and control of individual and crowd behaviour	Face to face	NIA
CPPSEC3110 Control persons using batons	Face to face	NIA
CPPSEC3114 Control security risk situations using firearms	Face to face	NIA
CPPSEC3118 Inspect and test cash-in-transit security equipment and rectify faults	Face to face	N/A
CPPSEC3121 Control persons using empty hand techniques	Face to face	N/A

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

## Interviewees

Name	Position	Training products
De'Anne Stegert	Chief Executive Officer	NIA
Amanda Starkey	Operations Manager	NIA

## About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs). 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.

## Areas of non-compliance and action required

### Training and Assessment

#### Training Delivery and Assessment

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##### Standards for RTOs • Standard 1

**The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.**

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##### Clause 1.1

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

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.

##### Key sources of evidence relevant to finding

*CPPSEC3114 Control security risk situations using firearms*

- TAS Security Guard Development Course.pdf - dated 3 December 2020
- Firearms Session Plan - dated 3 December 2020
- TAS Security Guard Development Course 15OCT20.docx - provided on 18 December 2020
- Firearm Session Plan.pdf - dated 18 December 2020

Interview:

- De'Anne Siegert - CEO

##### Evidence analysis

The provider demonstrated that it has a documented training and assessment strategy to support the delivery of unit *CPPSEC3114 Control security risk situations using firearms*. Information about the planned delivery of the unit is also included in the provider's 'Firearms Session Plan'.

The initial version of the training and assessment strategy document (dated 3 December 2020) submitted by the provider did not identify that in order to undertake unit *CPPSEC3114 Control security risk situations using firearms* a learner must firstly have achieved at least one of units *CPPSEC3115*, *CPPSEC3116* or *CPPSEC3117*, or a firearms training course approved in the relevant jurisdiction. This pre-requisite unit requirement is specified in the CPP Training Package for unit *CPPSEC3114 Control security risk situations using firearms*.

It was also stated in the provider's accompanying Firearms Session Plan dated 3 December 2020 (with reference to units *CPPSEC3114*, *CPPSEC3115*, *CPPSEC3116* and *CPPSEC3117*) that 'These units can be accessed individually or in combination with other units meeting the CPP Property Service Training Package Requirements'. According to the assessment conditions specified in the CPP Training Package for unit *CPPSEC3114*, the unit must be assessed in conjunction with one of the other units (either *CPPSEC3115*, *CPPSEC3116* or *CPPSEC3117*) unless the person has already completed an approved firearms course in the relevant jurisdiction and can provide appropriate supporting evidence. Therefore, the statement in the provider's Firearms Session Plan dated 3 December 2020 which indicated that unit *CPPSEC3114* could be 'accessed individually' could only apply when a student has already completed an approved firearms course in the relevant jurisdiction and can provide appropriate supporting evidence; hence the information was incomplete and may result training and assessment practices that would contradict the CPP Training Package requirements in the event that a student had not already completed an approved firearms training course.

When asked for an explanation as to how the RTO will ensure that both the pre-requisite and assessment conditions requirements specified in the CPP Training Package will be met in relation to the delivery of unit *CPPSEC3114*, the CEO advised that she would need to discuss this with the RTO's nominated trainer and assessor for the unit before providing a response. An updated training and



## Evidence analysis

assessment strategy document - TAS Security Guard Development Course 15OCT20.docx - was subsequently provided on 18 December 2020, accompanied by an amended Firearms Session Plan document and updated/replacement assessment tools for unit *CPPSEC3114*.

The provider's updated 'Firearms Session Plan' dated 18 December 2020 contains information that is unclear and potentially inconsistent with the assessment conditions specified in the CPP Training Package for unit *CPPSEC3114*. Specifically, on page 2 in the session plan document it is stated:

*'The units covered for the course are:*

- *CPPSEC3114 Control security risk situations using firearms*
- *CPPSEC3115 Carry, operate, and maintain revolvers for security purposes, or*
- *CPPSEC3116 Carry, operate, and maintain semi-automatic pistols for security purposes, or*
- *CPPSEC3117 Carry, operate, and maintain shotguns for security purposes, or*
- *Firearms training course approved in the relevant State/Territory jurisdiction*

*The unit CPPSEC3114 Control security risk situations using firearms, is delivered, and assessed as a standalone unit. A student must achieve competence in 1 of the other 3 units or have a firearms training course approved in the relevant jurisdiction and the remaining units can be co-assessed depending on the students (sic) needs for their employment.'*

However, according to the assessment conditions specified in the CPP Training Package for unit *CPPSEC3114*, the only time when unit *CPPSEC3114* may be assessed as a standalone unit is when the person has already completed firearms training course in the relevant jurisdiction and can provide appropriate supporting evidence. Under other circumstances, unit *CPPSEC3114* must be assessed in conjunction with either unit *CPPSEC3115*, or unit *CPPSEC3116*, or unit *CPPSEC3117*.

Information contained in the provider's updated training and assessment strategy document-TAS Security Guard Development Course 15OCT20.docx - i.§ consistent with assessment conditions specified in the CPP Training Package whereby it is stated on page 17 that unit *CPPSEC3114* must be assessed with one of *CPPSEC3115* or *CPPSEC3116* or *CPPSEC3117* unless the person has already completed an approved firearms training course in the relevant jurisdiction and can provide appropriate supporting evidence. However, the information in the updated training and assessment strategy document (provided on 18 December 2020) is contradicted by the information contained in the updated 'Firearms Session Plan' document (dated 18 December 2020) which states that unit *CPPSEC3114* is delivered and assessed as a standalone unit.

## Audit finding

*Not compliant*

The provider has not demonstrated that its intended strategy for delivery of unit *CPPSEC3114 Control security risk situations using firearms* is consistent with the requirements of the CPP Property Services Training Package for the unit.

## Action required

Provide evidence that unequivocally demonstrates the provider's intended training and assessment strategy for unit *CPPSEC3114 Control security risk situations using firearms* will ensure that it will fully address all requirements of the CPP Property Services Training Package as relevant to the unit

## Additional evidence provided in response to audit report

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### Key sources of evidence relevant to findings

*CPPSEC3114 Control security risk situations using firearms*

- Firearms Session Plan.pdf
- Meeting with Mark 010221.pdf.

### Evidence analysis

The provider has addressed the non-compliance, having submitted additional evidence in the form of an amended Firearms Session Plan to supplement the provider's updated training and assessment strategy document submitted in December 2020. Collectively, the evidence indicates that the provider intends to implement a training and assessment strategy that will enable learners to meet all of the requirements specified in the CPP Training Package for unit *CPPSEC3114 Control security risk situations using firearms*

### Finding following additional evidence

Compliant

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### Standards for RTOs - Standard 1

**The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.**

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#### Clause 1.3

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

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.

#### Key sources of evidence relevant to finding

- TAS Security Guard Development Course.pdf
- Resources Checklist for Security Units.pdf
- Training Room & Equipment for Security.pdf
- Stat Dec from Mark regarding Equipment.pdf
- Radios to use.pdf
- Equipment pictures.pdf

Interview:

- De'Anne Stegert- CEO

### Evidence analysis

Registered training organisations seeking to add training products to their scope of registration are expected to have access to all required resources for each training product including in their application at the time of submitting their application. Resources included trainers and assessors, educational and support services, learning resources, facilities and equipment. These resources must be consistent with the provider's training and assessment strategies, be accessible to learners and enable them to meet the requirements for each unit of competency.

Guidance regarding these requirements is outlined in the General Direction *Resourcing requirements - for applicants seeking initial registration or change to scope of registration*. With reference to facilities and equipment, the General Direction states:

*Applicants seeking registration must have equipment (owned or leased) to deliver all units of competency included in strategies for training and assessment.*

Compliance with the requirements of the General Direction is a condition of registration.

## Evidence analysis

The organisation has demonstrated that it owns learning resources and has access to a trainer/assessor to deliver the units of competency that it is seeking to add to its scope of registration via its third party arrangement with non-RTO, Impact Firearms Training.

Whilst the organisation also demonstrated that it has access to most of the equipment required to deliver the units that it is seeking to add to scope, the availability of some required equipment was unable to be confirmed from the evidence provided during the audit. Specifically:

- Ballistic vests - The RTO's third party trainer/assessor provided a statutory declaration stating that these are not able to be purchased by non-authorized persons and that they will be purchased prior to training commencing.
- Alarm system, access control system, surveillance camera - This equipment is listed in the organisation's training and assessment strategy (ref: TAS Security Guard Development Course.pdf, page 16) and in the assessment conditions specified in the CPP Training Package for unit *CPPSEC3118 Inspect and test cash-in-transit security equipment and rectify faults*, where it is stated:  
*'Assessors are responsible for ensuring that the person demonstrating competency has access to: ...*
  - *alarm system*
  - *access control system*
  - *surveillance camera.....'*

However, the above security equipment was not listed in the RTO's 'Resources Checklist for Security Units', nor was it included in any photographic evidence of equipment provided by the organisation during the audit. Whilst it is indicated in the instructions for the practical assessment tasks contained the assessment tools for unit *CPPSEC3118* that students will 'need access to' the above equipment, it is unknown how the provider (or its assessor) will ensure that students have access to an appropriate alarm system, access control system and surveillance camera when delivering unit *CPPSEC3118*, for no evidence has been provided to demonstrate that the RTO or its assessor have, or have access to, this equipment.

## Audit finding

*Not compliant*

The provider did not demonstrate how it will ensure that students have access to all of the equipment specified in the training package as required for delivery of unit *CPPSEC3118 Inspect and test cash-in-transit security equipment and rectify faults* that the RTO is seeking to add to its scope of registration.

## Action required

- Provide evidence that demonstrates how the RTO will ensure students will have access to all of the required equipment when undertaking assessment for unit *CPPSEC3118 Inspect and test cash-in-transit security equipment and rectify faults*, in particular:
  - o an alarm system
  - o access control system
  - o surveillance camera.

## Additional evidence provided in response to audit report

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### Key sources of evidence relevant to findings

- Clause 1.3 Rectification.pdf
- Meeting with Mark 010221.pdf
- Resources Checklist for Security Units.pdf

## Evidence analysis

The provider has addressed the non-compliance, having submitted additional evidence in the form of photographs, copies of receipts and an updated resource checklist to support that it has access to

- o an alarm system
- o access control system
- o surveillance camera.

The provider's further explanation about its current inability to provide evidence of having access to ballistic vests due to other overriding Queensland legislative/regulatory requirements is noted. It is also noted that the provider has advised that once the RTO has the unit *CPPSEC311 B Inspect and test cash-in-transit security equipment and rectify faults* on its scope of registration, it will purchase the ballistic vests as it will have a 'genuine reason' to do so in line with relevant legislative/regulatory requirements.

## Finding following additional evidence

Compliant

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### Standards for RTOs - Standard 1

**The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.**

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#### Clause 1.8

**Audit Finding: Not compliant**

**Finding following additional evidence: Not compliant**

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.

#### Key sources of evidence relevant to finding

*CPP20218 Certificate II in Security Operations*

*CPPSEC2107 Patrol premises to monitor property and maintain security*

- Assessment tools:
  - CPPSEC2107 Underpinning Knowledge.docx, V1.02 June 2020
  - CPPSEC2107 Underpinning Knowledge Marking Guide.docx, V1.02 June 2020
- Completed student assessments for:
  - Student KP

*CPPSEC2111 Apply security procedures to manage intoxicated persons*

- Assessment tools:
  - CPPSEC2111 Underpinning Knowledge.docx, V1.02 June 2020
  - CPPSEC2111 UK Marking Guide.docx, V1.02 June 2020
  - CPPSEC2111 Case Scenario.docx, V1.02 June 2020
  - CPPSEC2111 Case Scenario Marking Guide.docx, V1.02 June 2020
  - CPPSEC2111 Practical 1.docx, V1.02 June 2020
  - CPPSEC2111 Practical 1 Marking Guide.docx, V1.02 June 2020
  - CPPSEC2111 Practical 2.docx, V1.02 June 2020
  - CPPSEC2111 Practical 2 Marking Guide.docx, V1.02 June 2020
  - CPPSEC2111 Mapping.docx, V1.02 June 2020

Additional documents:

- CPPSEC2111 Practical 1 Note Book.docx
- CPPSEC2111 Practical 2 Note Book.docx
- CPPSEC2111 Resource for Practical 1 Note Book.docx

### Key sources of evidence relevant to finding

- CPPSEC2111 Resource for Practical 2 Note Book.docx
- Layout of Glamorama Night Club.png
- Completed student assessments for:
  - Student KP

Interview:

- De'Anne Stegert - CEO.

### Evidence analysis

A provider must develop and implement an assessment system to ensure:

- all assessment requirements of the relevant training package are met
- the principles of assessment and rules of evidence are applied in the assessment practices.

The *principles of assessment* require that no matter which assessment pathway or method a provider uses, the principle of *reliability* must be applied. This means that evidence presented for assessment is consistently interpreted. Providers typically develop evidence criteria (i.e. decision-making rules) which may be articulated, for example, in the form of model answers (where appropriate) and/or descriptions of observable behaviours, to help assessors when judging the quality of a learner's performance and to ensure consistent judgements about competence.

In addition, the *rules of evidence* require that the assessment evidence used to make a decision must be *valid* and *sufficient*. With respect to these principles, learners may be required to demonstrate skills and knowledge across a range of environments and contexts relevant to a unit, to ensure that sufficient evidence is gathered to confirm that the learner is able to apply the relevant skills and knowledge in a range of situations and in a practical way.

The evidence reviewed does not support that the provider has implemented an assessment system that ensured that all assessment conducted for the qualification *CPP20218 Certificate II in Security Operations* has been conducted in accordance with the principle of assessment - reliability and the rules of evidence - validity and sufficiency

*CPP20218 Certificate II in Security Operations* (existing scope training product)

*CPPSEC2107 Patrol premises to monitor property and maintain security*

*CPPSEC2111 Apply security procedures to manage intoxicated persons*

The provider has evidenced that it has assessment tools, including marking guides, for the assessment tasks required to be undertaken by a learner for each of the above units. However, the provider has not demonstrated for some assessment tasks that valid and/or sufficient evidence has been collected through the assessment process in line with the evidence criteria provided in the relevant marking guide document to support the assessor's judgement about a learner's performance on the assessment task. Specifically:

- For sampled student KP, the student's written responses to questions 26A and 26B of the underpinning knowledge assessment for unit *CPPSEC2107* did not relate to the questions and did not align with the response guidance provided in the *CPPSEC2107 Underpinning Knowledge Marking Guide* document, however, the student's response had been marked 'S' (satisfactory). Under the heading 'Assessor to indicate how this professional judgement was made' it is stated in handwriting 'assessed written response'. The disparity between the content of the student's written responses and the response guidance provided in the marking guide document for questions 26A and 26B was discussed with the CEO during the audit, who advised that she would speak with the assessor about this matter. No additional information or evidence was provided by the RTO to demonstrate that valid evidence aligned to the response guidance in the marking guide was collected through the assessment process to support the assessor's judgement about KP's knowledge in relation to questions 26A and 26B of the underpinning knowledge assessment for unit *CPPSEC2107*.
- For sampled student KP, the student's written response to questions 15, 17 and 19 of the underpinning knowledge assessment for unit *CPPSEC2111* did not reflect the breadth and depth of responses provided in the *CPPSEC2111 UK Marking Guide* document, however the student's responses had been marked 'S' (satisfactory). Under the heading 'Assessor to

## Evidence analysis

indicate how this professional judgement was made' for each question it is stated in handwriting 'written response'. The disparities between the content of the student's written responses and the response guidance provided in the marking guide document for questions 15, 17 and 19 were discussed with the CEO during the audit, who advised that she would speak with the assessor about these matters. No additional information or evidence was provided by the RTO to demonstrate that sufficient evidence aligned to the response guidance in the marking guide was collected through the assessment process to support the assessor's judgement about KP's knowledge in relation to questions 15, 17 and 19 of the underpinning knowledge assessment for unit *CPPSEC2111*.

- For sampled student KP, the assessment documents provided did not include evidence of the student's responses to Case Scenario Assessment Tasks 1A, 1B, 1C and 1D (the Suncorp Stadium scenario) for unit *CPPSEC2111*, including evidence that such responses had been assessed in accordance with the evidence guidance contained in the *CPPSEC2111 Case Scenario Marking Guide* document. During audit discussions, the provider was asked to explain how/where the assessment documents provided for student KP addressed the requirements of the case scenario assessment tasks - for the assessment documents provided (consisting of *CPPSEC2111 Practical 1 Note Book entry*, and *CPPSEC2111 Practical 2 Note Book entry*) did not appear to relate to the case study assessment task requirements, nor did they align with the evidence guidance contained in the *CPPSEC2111 Case Scenario Marking Guide* document for Assessment Task 1. In response, the CEO advised that the documents were provided by the assessor and that she would check with the assessor. Review of an additional document subsequently provided by the RTO found that it contained handwritten comments-and appeared to be an amended version (copy) of page 63 in the previously provided document *CPPSEC2111 K Pitchford.pdf*. Under the heading 'Assessor to indicate how this professional judgement was made', were the handwritten words 'assessed on worksheet', 'As per observation', 'Workbook' and 'Notebooks'. It is not clear how these assessor comments relate to the case scenario assessment task 1 requirements, where the task consists of 4 specific questions referring to the Suncorp Stadium scenario provided - for example, Task 1A states, '*Consider how calm, courteous and respectful oral communication supported by appropriate non-verbal language may be used in this situation. Discuss the strategies you would use to calm the young lady. Approximately 100 words*'. Based on the assessment documentation provided for student KP, it cannot be confirmed that the student completed all of the case scenario tasks and was assessed in accordance with the relevant evidence guidance (marking guide) that forms part of the RTO's assessment system for the unit.

## Audit finding

### *Not compliant*

The provider has not demonstrated that in implementing its assessment system for the qualification *CPP20218 Certificate II in Security Operations* all assessment has been conducted in accordance with the principle of assessment - reliability and the rules of evidence - validity and sufficiency.

## Action required

Provide evidence that demonstrates:

- the provider has taken action to ensure that all future assessment of students for units from *CPP20218 Certificate II in Security Operations* will be conducted in accordance with the principles of assessment and rules of evidence
- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused students enrolled in *CPP20218 Certificate II in Security Operations* who were not assessed in a manner that did not meet the requirements of clauses 1.8. Remedial action needs to cover current students and students who enrolled in and/or completed any units from the qualification during the past six months.

## Addit:mal evidence provided in response to audit report

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### Key sources of evidence relevant to findings

CPP20218 Certificate II in Security Operations (existing scope training product)

CPPSEC2107 Patrol premises to monitor property and maintain security

CPPSEC2111 Apply security procedures to manage intoxicated persons

- Gap Training Rectification.msg
- Gap Training Rectification (1).msg
- Security Gap Training.xlsx
- Meeting with Mark 010221.pdf

### Evidence analysis

The provider has not fully addressed the non-compliance with respect to the 'Action required'. Specifically:

- With reference to ensuring that all future assessment of students for units from *CPP20218 Certificate II in Security Operations* will be conducted in accordance with the principles of assessment and rules of evidence, the provider has advised that it has provided the assessor with an extract from the 'User's Guide to the Standards for Registered Training Organisations 2015' containing information about clauses 1.8 to 1.12. The actions taken are referred to in the provider's written response as follows:  
*Handout of Clauses 1.8 to 1.12 Conduct effect (sic) assessment given to (name of assessor) to have for his records*  
*(Name of assessor) it (sic) going to read through the Clauses 1.8 to 1.12 Conduct effect (sic) assessment at his own leisure now that we have been through it together. If he has any questions, he will address them to me as soon as possible.*

Whilst the provider's response indicates that it has taken action to inform/remind the assessor of the requirements for assessment to be conducted in accordance with the principles of assessment and rules of evidence, the efficacy of this approach in *ensuring* that all future assessments will be conducted in accordance with the principles of assessment and rules of evidence can only be determined upon implementation. No additional information has been provided in the organisation's response about the mechanisms or strategies that it will use to *ensure* that all future assessment of students *will be* conducted in accordance with the principles of assessment and rules of evidence.

- The evidence provided demonstrates that the provider has contacted two students by email to offer gap training in relation to units *CPPSEC2017* and *CPPSEC111*. No other information was provided about the provider's remedial action plan to identify and address the impact the non-compliance may have caused to the students.

### Finding following additional evidence

Not compliant

Insufficient information and evidence has been provided to demonstrate that:

- action taken by the provider will *ensure* that all future assessment of students for units from *CPP20218 Certificate II in Security Operations* will be conducted in accordance with the principles of assessment and rules of evidence
- the provider has carried out remedial action - or has a remedial action plan in place - to address the impact the non-compliance may have caused students enrolled in *CPP20218 Certificate II in Security Operations* who were not assessed in a manner that did not meet the requirements of clauses 1.8.

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## Standards for RTOs - Standard 1

The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.

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### Clause 1.9

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

The RTO implements a plan for ongoing systematic validation of assessment practices and judgements that includes for each training product on the RTO's scope of registration:

- a) when assessment validation will occur;
- b) which training products will be the focus of the validation;
- c) who will lead and participate in validation activities; and
- d) how the outcomes of these activities will be documented and acted upon.

### Clause 1.11

**Audit Finding: Not compliant**

**Finding following additional evidence: Compliant**

For the purposes of Clause 1.9, systematic validation of an RTO's assessment practices and judgements is undertaken by one or more persons who are not directly involved in the particular instance of delivery and assessment of the training product being validated, and who collectively have:

- (i) vocational competencies and current industry skills relevant to the assessment being validated;
- (ii) current knowledge and skills in vocational teaching and learning; and
- (iii) the training and assessment credential specified in Item 2, or Item 5 of Schedule 1.

Industry experts may be involved in validation to ensure there is the combination of expertise set out above.

### Key sources of evidence relevant to finding

- 10618NAT Validation.pdf
- 10618NAT Moderation.pdf
- AHCMOM216 Validation.pdf
- AHCPMG304 Validation.pdf
- AHCPMG304 Moderation.pdf
- AHCPMG311 Validation.pdf
- AHCPMG311 Moderation.pdf
- CPP20218 Validation.pdf
- HLTA1D001 Moderation.pdf
- HLTAID006 Validation.pdf
- RII30815 Moderation.pdf
- RII30915 Moderation.pdf
- TLILIC0002 Validation.pdf
- TLILIC0003 Validation.pdf
- TLILIC0003 Validation 2.pdf
- TLILIC0012 Validation.pdf
- UETDRRF03 Validation.pdf
- UETDRRF06 Validation.pdf
- Mod & Val for ASQA Oct 2020.pdf
- Mod & Val Report Oct 2020.pdf

Interview:

- De'Anne Stegert - CEO

### Evidence analysis

Validation is defined in the *Standards for Registered Training Organisations (RTOs) 2015* as follows:



## Evidence analysis

*Validation is the quality review of the assessment process. Validation involves checking that the assessment tool/s produce/s valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the training package or VET accredited courses are met. It includes reviewing a statistically valid sample of the assessments and making recommendations for future improvements to the assessment tool, process and/or outcomes and acting upon such recommendations.*

The organisation provided documents identified as 'Assessment Validation Report' and 'Assessment Moderation Report' for a number of training products during the audit. The documents identified as an 'Assessment Validation Report' were found to document reviews conducted by an 'Assessment Validation Panel' on 'pre-assessment tools - that is, tools that have not yet been implemented' (as noted on the first page of each report); whilst the documents identified as an 'Assessment Moderation Report' were found to document the review of completed student assessments.

With respect to the meaning of 'validation' as defined in the Standards, the RTOs 'Assessment Validation Report' documents alone do not reflect an adequate validation process, as the provider's validation process did not include review of a statistically valid sample of assessments to check that the assessment tool/s produce/s valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the training package are met. Rather, it appears that the 'moderation' process used by the RTO and reported in the 'Assessment Moderation Report' documents is, in fact, more akin to the definition of validation. (and not moderation - refer to Clause 8.5 for further details) as that process did include review of completed student assessments.

Taking into account the information contained collectively in both the RTO's validation and moderation documents, and with respect to the conduct of validation as required under Standards, some evidence has been provided to support that the RTO has undertaken validation activities for the following training products:

- 10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)
- AHCPMG304 Use firearms to humanely destroy animals
- AHCPMG311 Use firearms for pest control activities from aircraft
- HLTAID001 Provide cardiopulmonary resuscitation
- RI30815 Certificate III in Civil Construction Plant Operations
- RI30915 Certificate III in Civil Construction.

However, it is not clear from the evidence provided that the number of assessments reviewed was a statistically valid sample of assessments.

With respect to the following training products, insufficient evidence has been provided to demonstrate that the RTO has conducted adequate validation:

- AHCMOM216 Operate side by side utility vehicles
- CPP20218 Certificate II in Security Operations
- HLTAID006 Provide advanced first aid\*\*
- TLILIC002 Licence to operate a vehicle loading crane (capacity 10 metre tonnes and above)\*
- TLILIC003 Licence to operate a forklift truck\*
- TLILIC0012 Licence to operate a vehicle loading crane (capacity 10 metre tonnes and above)\*\*\*
- UETDRRF03 Perform EWP rescue
- UETDRRF06 Perform rescue from a live LV panel.

Specifically, the evidence provided indicates that for the above training products, only 'pre-assessment tools' have been reviewed. No evidence has been provided to demonstrate and confirm that in implementing its plan for validation, the RTO's validation process for the above training products included review of a statistically valid sample of assessments and, additionally, that validation of the assessment practices and judgements was undertaken by one or more persons who collectively met the requirements of clause 1.11.

*\*Training product has been removed from the RTO's explicit scope of registration, but remains as a name elective in RI/ qualifications that the provider has on scope.*

## Evidence analysis

*\*\* Unit is an implicit scope unit, being a named elective in the TL/40218 qualification that the provider has on scope. No students were identified in delivery data submitted by the RTO as having completed this unit.*

*\*\*\*Superseded training product that has been removed from the RTO's explicit scope of registration. No students were identified in delivery data submitted by the RTO as having completed this unit.*

## Audit finding

*Not compliant*

The provider has not demonstrated that in implementing its plan for validation of the identified training products, the validation process included review of assessment practices and judgements for a statistically valid sample of assessments. Consequently, it also could not be confirmed that for all training products identified by the RTO as having undergone validation, validation of the assessment practices and judgements was conducted in accordance with the requirements of clause 1.11.

## Action required

- For each of the following training products - provide additional evidence of the process and outcomes from validation of the assessment practices and judgements for a statistically valid sample of assessments, undertaken to check that the assessment tool/s produce/s valid, reliable, sufficient, current and authentic evidence to enable reasonable judgements to be made as to whether the requirements of the training package are met:
  - 10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)
  - AHCMOM216 Operate side by side utility vehicles
  - AHCPMG304 Use firearms to humanely destroy animals
  - AHCPMG311 Use firearms for pest control activities from aircraft
  - CPP20218 Certificate II in Security Operations
  - HLTAID001 Provide cardiopulmonary resuscitation
  - RIICOM201D Certificate III in Civil Construction Plant Operations
  - RIIGOV201D Certificate III in Civil Construction
  - UETDTRRF03 Perform EWP rescue
  - UETDTRRF06 Perform rescue from a live LV panel.

In providing evidence of the validation process for each training product, the provider must also demonstrate how the requirements of clause 1.11 have been satisfied.

## Additional evidence provided in response to audit report

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### Key sources of evidence relevant to findings

- Assessment Validation Report.pdf
- Assessment Moderation Report.pdf
- Assessment Val Schedule 2020 - 2025.pdf
- Pre-Validation folder containing the following documents:
  - 10618 NAT Validation.pdf - date of pre-assessment validation 08/02/2021
  - AHCMOM216 Validation.pdf - date of pre-assessment validation 08/02/2021
  - AHCPMG304 Validation.pdf - date of pre-assessment validation 08/02/2021
  - AHCPMG311 Validation.pdf - date of pre-assessment validation 09/02/2021
  - CPPSEC211 Validation.pdf - date of pre-assessment validation 10/02/2021
  - CPPSEC2107 Validation.pdf - date of pre-assessment validation 10/02/2021
  - HLTAID001 Validation.pdf - date of pre-assessment validation 12/02/2021
  - RIICOM201D Validation.pdf - date of pre-assessment validation 15/02/2021
  - RIIGOV201D Validation.pdf - date of pre-assessment validation 14/02/2021
  - RIISAM204D Validation.pdf - date of pre-assessment validation 10/02/2021
  - RIIWHS202D Validation.pdf - date of pre-assessment validation 01/02/2021
  - UETDTRRF03 Validation.pdf - date of pre-assessment validation 10/02/2021
  - UETDTRRF06 Validation.pdf - date of pre-assessment validation 16/02/2021

### Key sources of evidence relevant to findings

- Post-Validation folder containing the following documents:
  - 10618 NAT Post Validation.pdf - date of post-assessment validation 15/02/2021, 40 students
  - AHCMOM216 Post Validation.pdf - date of post-assessment validation 14/02/2021, 13 students
  - AHCPMG304 Post Validation.pdf - date of post-assessment validation 14/02/2021, 19 students
  - AHCPMG311 Post Validation.pdf - date of post-assessment validation 15/02/2021, 12 students
  - CPPSEC2107 Post Validation.pdf - date of post-assessment validation 16/02/2021, 2 students
  - CPPSEC2111 Post Validation.pdf - date of post-assessment validation 18/02/2021, 2 students
  - HLTAID001 Post Validation.pdf - date of post-assessment validation 18/02/2021, 42 students
  - RIICOM201D Post Validation.pdf - date of post-assessment validation 15/02/2021, 19 students
  - RIIGOV201D Post Validation.pdf - date of post-assessment validation 14/02/2021, 19 students
  - RIISAM204D Post Validation.pdf - date of post-assessment validation 15/02/2021, 9 students
  - RIIWHS202D Post Validation.pdf - date of post-assessment validation 17/02/2021, 19 students
  - UETTDRRF03 Post Validation.pdf - date of post-assessment validation 14/02/2021, 8 students
  - UETTDRRF06 Post Validation.pdf - date of post-assessment validation 16/02/2021, 38 students

### Evidence analysis

The evidence provided indicates that the provider has undertaken action to address the previous non-compliance with respect to clauses 1.9 and 1.11 of the Standards.

Whilst the provider has endeavoured to demonstrate how the requirements of clause 1.11 have been satisfied when undertaking validation, it was noted that the identification of the training and assessment credential required by at least one member of the validation team (as specified in the validation documents submitted by the provider) does not fully align with the requirements of the Standards for RTOs. Specifically, in the provider's pre-validation and post-validation documents provided it was stated that:

*Assessment validation is to be undertaken by one or more persons who collectively hold:*

*3. TAE40110 Certificate IV in Training and Assessment (or its successor) or TAESS00001 Assessor skill set (or its successor)*

The above statement does not fully and accurately reflect the requirements of clause 1.11 (b) (iii) of the Standards for RTO's which refers to the training assessment credential specified in Item 2 or Item 5 of Schedule 1. With respect to Item 2, the credential specified at Item 2 of Schedule 1 of the Standards is:

*Credential:*

*TAE40116 Certificate IV in Training and Assessment or its successor*

*or*

*Credential:*

*TAE40110 Certificate IV in Training and Assessment, and one of the following:*

- (i) TAELLN411 Address adult language, literacy and numeracy skills or its successor or*
- (ii) TAELLN401A Address adult language, literacy and numeracy skills*

## Evidence analysis

and one of the following:

- (iii) TAEASS502 Design and develop assessment tools or its successor or
- (iv) TAEASS502A Design and develop assessment tools or
- (v) TAEASS5028 Design and develop assessment tools.

An individual holding the credential TAE40110 Certificate IV in Training and Assessment, by itself, would not fully satisfy the training and assessment credential requirements under clause 1.11. Although there is no evidence indicating that the RTO has relied on the incomplete statement about credential requirements (as specified in its validation documents) when undertaking its validation processes, the provider may wish to consider revising its validation documentation to ensure that it fully aligns with the requirements specified in clause 1.11 with respect to the credential requirements for persons undertaking validation.

## Finding following additional evidence

Compliant

## Regulatory Compliance / Governance

### Compliance with legislation

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Standards for RTOs - Standard 8

The RTO cooperates with the VET Regulator and is legally compliant at all times.

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Clause 8.5

**Audit Finding: Not compliant**

**Finding following additional evidence: Not compliant**

The RTO complies with Commonwealth, State and Territory legislation and regulatory requirements relevant to its operations.

#### Key sources of evidence relevant to finding

- 10618NAT Validation.pdf
- 10618NAT Moderation.pdf
- AHCMOM216 Validation.pdf
- AHCPMG304 Validation.pdf
- AHCPMG304 Moderation.pdf
- AHCPMG311 Validation.pdf
- AHCPMG311 Moderation.pdf
- CPP20218 Validation.pdf
- HLTAID001 Moderation.pdf
- HLTAID006 Validation.pdf
- RII30815 Moderation.pdf
- RII30915 Moderation.pdf
- TLILIC0002 Validation.pdf
- TLILIC0003 Validation.pdf
- TLILIC0003 Validation 2.pdf
- TLILIC0012 Validation.pdf
- UETDRRF03 Validation.pdf
- UETDRRF06 Validation.pdf
- Mod & Val for ASQA Oct 2020.pdf
- Mod & Val Report Oct 2020.pdf
- Delivery Data and Student Survey Data Template.xlsx
- Update to minor registration details - Changes submitted via the ASQAnet portal, 19/10/2020.

## Key sources of evidence relevant to finding

Interview:

De'Anne Stegert - CEO

## Evidence analysis

In accordance with the Administrative Appeals Tribunal Terms of Agreement dated 19 February 2020, ASQA imposed the following condition on the registration of Central Safety Training and Assessing Services Pty Ltd under section 29 (1) of the NVR Act:

- (b) *Validate assessment materials, in accordance with clauses 1.9 and 1.11 of the Standards, for 20% of all training products on scope by 31 October 2020. Evidence of the validation process and outcomes must be retained to present to ASQA upon request between 1 November 2020 and 1 November 2021.*
- (c) *Moderate ten (10) completed student assessment files, or otherwise 100% of completed student assessment files available, against the requirements of clause 1.8 of the Standards, from each of the following training products on scope by 31 October 2020*
  - (i) *AHCPMG304 Use firearms to humanely destroy animals*
  - (ii) *HLTAID001 Provide cardiopulmonary resuscitation*
  - (iii) *R/130915 Certificate III in Civil Construction*
  - (iv) *R/130815 Certificate III in Civil Construction Plant Operations*
  - (v) *SHB30115 Certificate III in Beauty Services*
  - (vi) *1061BNAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)*
  - (vii) *AHCPMG311 Use firearms for pest control activities from aircraft**Evidence of the moderation process and outcomes must be retained to present to ASQA upon request between 1 November 2020 and 1 November 2021.*

As previously noted with respect to clauses 1.9 and 1.11, the provider has submitted insufficient evidence to confirm and that the RTO has conducted adequate validation for training products which form part of the 20% sample of all training products that the RTO claims it had validated by 31 October 2020.

Furthermore, for several units that were included among those that the RTO claims it had validated by 31 October 2020, no students were identified in the delivery data submitted by the RTO as having completed the unit within the past 6 months or having been awarded a statement of attainment for the unit within the past 12 months. These units included *HLTAID006 Provide advanced first aid* (it was noted that this unit is not part of the RTO's explicit scope of registration but is a named elective in the training package the qualification *TLI40218 Certificate IV in Mobile Crane Operations*) and superseded unit *TLILIC0012 Licence to operate a vehicle loading crane (capacity 10 metre tonnes and above)*. It is unclear why, if there were no completed assessments to sample and review during the validation process, these training products were identified for validation. In addition, with reference to unit *TL/LIC0012*, it is also noted that (according to ASQA's records) on 19 October 2020 the provider submitted an 'Update to minor registration details' advice to ASQA requesting removal of the unit from its scope of registration; yet the 'date of validation' recorded in the provider's document 'Assessment Validation Report' for unit *TLILIC0012* (ref: *TLILIC0012 Validation.pdf*) is '20/10/2020', being the day after the provider requested removal of the training product from its scope of registration. In this particular case it is unknown why validation (on 'pre-assessment tools') would have been conducted for this training product when the provider had already requested that it be removed from its scope.

With respect to the requirement for moderation of complete students assessment files against the requirements of clause 1.8 for specified training products - Whilst moderation is not defined in the *Standards for Registered Training Organisations (RTOs) 2015*, ASQA's Fact Sheet 'Conducting Validation' describes moderation as follows:

**Moderation** is a quality control process aimed at bringing assessment judgements into alignment. Moderation is generally **conducted before the finalisation of student**

## Evidence analysis

**results** as it ensures the same decisions are applied to all assessment results within the same unit of competency.

However, the 'Assessment Moderation Report' documents submitted suggest that the moderation process used by the organisation is more akin to validation rather than moderation; for a number of students listed in the moderation samples and moderation reports for the following training products were recorded as having completed the unit some weeks or months prior to the date of moderation of the student's completed assessment/s. These findings raise questions about whether moderation of the completed assessments was conducted prior to finalisation of the student results, consistent with a moderation process

- (vi) For unit *AHCPMG304 Use firearms to humanely destroy animals*, completed Assessment Moderation Report documents were provided for 9 students. All of the moderation reports stated the date of moderation as 08/10/2020. However, 7 of the 9 students had reported unit completion dates in May or June 2020 (as reported in the document 'Delivery Data and Student Survey Data Template.xlsx'), being several months prior to the moderation date.
- (vii) For unit *AHCPMG311 Use firearms for pest control activities from aircraft*, completed Assessment Moderation Report documents were provided for 8 students. All of the moderation reports stated the date of moderation as 08/10/2020. However, 3 of the 8 students had reported unit completion dates in May or June 2020 (as reported in the document 'Delivery Data and Student Survey Data Template.xlsx'), being several months prior to the moderation date.
- (viii) For unit *HLTAID001 Provide cardiopulmonary resuscitation*, a single completed Assessment Moderation Report document (3 pages) was provided listing 10 students. The date of moderation stated in the document was 16/10/2020. However, for the students listed the reported unit completion dates were August 2020 (as reported in the document 'Delivery Data and Student Survey Data Template.xlsx'), being at least 6 or more weeks prior to the moderation date.

Under the heading 'Moderation report' in the document 'Mod & Val Report Oct 2020.pdf', the provider has stated with reference to units *SHBXIND001* and *SHBBMUP001* from *SHB30115 Certificate III in Beauty Services* that 'No students completed but have some that are enrolled and continuing'. Whilst, based on this information, it would not have been possible for the RTO to moderate completed assessments for units *SHBXIND001* and *SHBBMUP001*, the enrolment and completion data provided by the organisation (as reported in the document 'Delivery Data and Student Survey Data Template.xlsx') indicates that 3 students did complete other units from the qualification during August and October 2020. The data provided indicates that there were at least 4 such completed student assessments that could possibly have been moderated against the requirements of clauses 1.8 of the Standards - as three students completed core unit *SHBBFSA001* and one student completed core unit *SHBBBOS001*. However, no evidence has been provided to support that any completed student assessments from the training product *SHB30115 Certificate III in Beauty Services* were moderated against the requirements of clause 1.8 by 31 October 2020.

The moderation evidence provided by the RTO was also noted to contain several anomalies, which included wording in the footer of the RTO's Moderation Reports where it is stated 'Assessment Validation Report', in addition to a statement within the Moderation Report documents that 'To determine the appropriate sample size of completed student files to be reviewed, the Sample Calculator from the ASQA website may be used', with a web link to the 'Conducting validation' webpage on ASQA's website (which only contains a 'validation sample size calculator', not a moderation sample size calculator).

## Audit finding

*Not compliant*

The organisation has provided insufficient evidence to demonstrate and confirm that it has fully complied with the validation and moderation requirements imposed as conditions on its registration, under section 29 (1) of the NVR Act.

## Action required

Provide additional evidence of (a) the validation process and outcomes, and (b) the moderation process and outcomes, that clearly demonstrates and confirms that the organisation has fully complied with the following conditions imposed by ASQA on the registration of Central Safety Training and Assessing Services Pty Ltd under section 29 (1) of the NVR Act:

- (b) Validate assessment materials, in accordance with clauses 1.9 and 1.11 of the Standards, for 20% of all training products on scope by 31 October 2020
- (c) Moderate ten (10) completed student assessment files, or otherwise 100% of completed student assessment files available, against the requirements of clauses 1.8 of the Standards, from each of the following training products on scope by 31 October 2020
  - (i) AHCPMG304 Use firearms to humanely destroy animals
  - (ii) HLTAID001 Provide cardiopulmonary resuscitation
  - (iii) RII30915 Certificate III in Civil Construction
  - (iv) RII30815 Certificate III in Civil Construction Plant Operations
  - (v) SHB30115 Certificate III in Beauty Services
  - (vi) 10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)
  - (vii) AHCPMG311 Use firearms for pest control activities from aircraft.

## Additional evidence provided in response to audit report

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### Key sources of evidence relevant to findings

- Pre-Validation folder containing the following documents:
  - o 10618 NAT Validation.pdf - date of pre-assessment validation 08/02/2021
  - o AHCMOM216 Validation.pdf - date of pre-assessment validation 08/02/2021
  - o AHCPMG304 Validation.pdf - date of pre-assessment validation 08/02/2021
  - o AHCPMG311 Validation.pdf - date of pre-assessment validation 09/02/2021
  - o CPPSEC211 Valildation.pdf - date of pre-assessment validation 10/02/2021
  - o CPPSEC2107 Validation.pdf - date of pre-assessment validation 10/02/2021
  - o HLTAID001 Validation.pdf - date of pre-assessment validation 12/02/2021
  - o RIICOM201D Valildation.pdf - date of pre-assessment validation 15/02/2021
  - o RIIGOV201D Validation.pdf - date of pre-assessment validation 14/02/2021
  - o RIISAM204D Validation.pdf - date of pre-assessment validation 10/02/2021
  - o RIIWHS202D Validation.pdf - date of pre-assessment validation 01/02/2021
  - o UETDRRF03 Validation.pdf - date of pre-assessment validation 10/02/2021
  - o UETDRRF06 Validation.pdf - date of pre-assessment validation 16/02/2021
- Post-Validation folder containing the following documents:
  - o 10618 NAT Post Validation.pdf - date of post-assessment validation 15/02/2021, 40 students
  - o AHCMOM216 Post Validation.pdf - date of post-assessment validation 14/02/2021, 13 students
  - o AHCPMG304 Post Validation.pdf - date of post-assessment validation 14/02/2021, 19 students
  - o AHCPMG311 Post Validation.pdf - date of post-assessment validation 15/02/2021, 12 students
  - o CPPSEC2107 Post Validation.pdf - date of post-assessment validation 16/02/2021, 2 students
  - o CPPSEC2111 Post Valildation.pdf - date of post-assessment validation 18/02/2021, 2 students
  - o HLTAID001 Post Validation.pdf - date of post-assessment validation 18/02/2021, 42 students
  - o RIICOM201D Post Valildation.pdf - date of post-assessment validation 15/02/2021, 19 students
  - o RIIGOV201D Post Validation.pdf - date of post-assessment validation 14/02/2021, 19 students
  - o RIISAM204D Post Validation.pdf - date of post-assessment validation 15/02/2021, 9 students

**Evidence analysis**

No evidence of moderation has been provided in relation to the training product *SHB30115 Certificate III in Beauty Services*. No additional information/evidence has been submitted by the provider with its evidence provided on 24 February 2021 in relation to the moderation of completed student assessments for this particular training product.

**Finding following additional evidence**

Non-compliant

Insufficient information and evidence has been provided to confirm that the organisation has taken action to fully address all of the moderation requirements that form part of the conditions that have been imposed under section 29 (1) of the NVR Act on the provider's registration.



### Key sources of evidence relevant to findings

- o RIIWHS202D Post Validation.pdf - date of post-assessment validation 17/02/2021, 19 students
- o UETTDRRF03 Post Validation.pdf - date of post-assessment validation 14/02/2021, 8 students
- o UETTDRRF06 Post Validation.pdf - date of post-assessment validation 16/02/2021, 38 students
- Moderation folder containing the following documents:
  - o 10618NAT Moderation HA.pdf - date of moderation 4/02/2021, 11 students
  - o 10618NAT Moderation SB Feb 2021.pdf - date of moderation 4/02/2021, 10 students
  - o AHCMOM216 Moderation SB Feb 2021.pdf - date of moderation 5/02/2021, 13 students
  - o AHCPMG304 Moderation HA.pdf - date of moderation 4/02/2021, 19 students
  - o AHCPMG311 Moderation DS Feb 2021.pdf - date of moderation 08/02/2021, 12 students
  - o CPPSEC2017 & 2111 Moderation.pdf - date of moderation not specified, 2 students
  - o HLTAID001 Moderation SB Feb 2021.pdf - date of moderation 5/2/2021, 11 students
  - o RIICOM201D Moderation HA.pdf - date of moderation 4/2/2021, 10 students
  - o RIIGOV201D Moderation HA.pdf - date of moderation 4/2/2021, 10 students
  - o RIISAM204D Moderation.pdf - date of moderation 19/02/2021, 10 students
  - o RIIWHS202D Moderation.pdf - date of moderation 19/02/2021, 10 students
  - o UETTDRRF03 Moderation DS Feb 2021.pdf - date of moderation 19/02/2021, 8 students
  - o UETTDRRF06 Moderation HA.pdf - date of moderation 4/2/2021, 10 students
  - o UETTDRRF06 Moderation SB Feb 2021.pdf - date of moderation 9/2/2021, 10 students.

### Evidence analysis

The provider has submitted additional evidence that demonstrates that the organisation has undertaken additional action directed towards addressing the validation and moderation requirements imposed as a condition on the registration of Central Safety Training and Assessing Services Pty Ltd under section 29 (1) of the NVR Act, in accordance with the Administrative Appeals Tribunal Terms of Agreement dated 19 February 2020. The relevant conditions on the provider's registration included the following requirements:

- (b) *Validate assessment materials, in accordance with clauses 1.9 and 1.11 of the Standards, for 20% of all training products on scope by 31 October 2020. Evidence of the validation process and outcomes must be retained to present to ASQA upon request between 1 November 2020 and 1 November 2021.*
- (c) *Moderate ten (10) completed student assessment files, or otherwise 100% of completed student assessment files available, against the requirements of clauses 1.8 of the Standards, from each of the following training products on scope by 31 October 2020*
  - (i) *AHCPMG304 Use firearms to humanely destroy animals*
  - (ii) *HLTAID001 Provide cardiopulmonary resuscitation*
  - (iii) *R/130915 Certificate III in Civil Construction*
  - (iv) *R/130815 Certificate III in Civil Construction Plant Operations*
  - (v) *SHB30115 Certificate III in Beauty Services*
  - (vi) *10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)*
  - (vii) *AHCPMG311 Use firearms for pest control activities from aircraft**Evidence of the moderation process and outcomes must be retained to present to ASQA upon request between 1 November 2020 and 1 November 2021.*

With respect to (b), the provider has submitted sufficient evidence, albeit noting that some validation activities have been undertaken outside of the end date timeframe of 31 October 2020.

With respect to (c), sufficient evidence has been provided in relation to moderation of completed student assessments for 6 of the 7 specified training products listed above, albeit noting that some moderation activities have occurred outside of the end date timeframe of 31 October 2020.

## Minor deficiencies

During the course of the audit, some minor deficiencies were noted. These were not significant such that they resulted in a finding of non-compliance against the relevant clause. They were however discussed with the provider and the provider agreed to remedy these. This included:

- During review of information about *CPPSEC20218 Certificate II in Security Operations* on the organisation's website on 18 November 2020 and 16 December 2020, it was noted that under the heading 'Certification' it was stated that on successful completion students would be issued with a statement of attainment; when in fact a student who successfully completes all units listed for the qualification should be issued with a testamur.

*Prior to the conclusion of audit discussions on 16 December 2020, the organisation's CEO sent the Lead Auditor an email advising that the website information for CPPSEC20218 had been corrected. Upon subsequent review of the webpage by the Lead Auditor it was noted that the previous information about certification had been removed.*

