

Performance assessment (audit) report



Kreate Pty Ltd

RTO code: 90782
CRICOS code: N/A
Date report finalised: 12 July 2023



Australian Government
Australian Skills Quality Authority

ASQA

(Working together)

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Assessment and Provider Details

Provider details

Provider's legal name:	Kreate Pty Ltd
Business/Trading names:	KREATE RURALBIZ TRAINING
RTO code:	90782
CRICOS code:	N/A

Assessment details

Application numbers:	ADDVET0044649 ADDVET0044650 ADDVET0044651 ADDVET0044652 ADDVET0044653
Audit number:	AUDREC0011992
Assessment reasons:	Compliance Monitoring Application - Change
Provider's contact details:	Sarah Mosley Chief Executive Officer smosley@ruralbiztraining.com.au 02 6884 8812
Address of site visited (if applicable):	N/A
Date of opening meeting:	19 April 2023
Date of interviews:	1 June 2023
Date of closing meeting:	16 June 2023

Assessment team

Lead Assessment Officer:	Monica McFadyen
Assessment Officers:	Jasmine Szczurko Gene Bourke (observing)

Report Summary

This report details findings against the following:

- *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs)

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

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 students and carrying out remedial action for current and past students.

Assessment findings

Report completed by: Monica McFadyen & Jasmine Szczurko

Practice	Legislation	Compliant	Not Compliant
Training and Assessment	Standards for RTOs	1.1, 1.2, 1.9, 1.14, 1.16	1.3, 1.8, 1.13
Completion	Standards for RTOs		3.1
Marketing and Recruitment	Standards for RTOs	4.1	
Enrolment	Standards for RTOs	5.2	5.1
Regulatory Compliance and Governance	Standards for RTOs	6.5, 7.1	2.2

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

- information provided directly by Kreate Pty Ltd to ASQA
- existing information and records held by ASQA concerning Kreate Pty Ltd
- information provided to ASQA’s assessors, interviews and observations, and documentation reviewed during the performance assessment (audit) of Kreate Pty Ltd
- other publicly available information - including but not limited to, information published on the provider’s website.

Training products sampled

Training Products	Modes of delivery/ assessment	Current enrolments
<p><i>AHC50116 Diploma of Agriculture</i></p> <ul style="list-style-type: none"> • <i>AHCBUS518 Prepare and monitor budgets and financial reports</i> 	<ul style="list-style-type: none"> • Online 	7
<p><i>AHC51222 Diploma of Community Group Coordination and Facilitation</i></p> <ul style="list-style-type: none"> • <i>AHCCCF507 Facilitate the development of group goals and projects</i> 	<ul style="list-style-type: none"> • Online 	N/A
<p><i>AHCSS00074 Agricultural Chemical Skill Set</i></p> <ul style="list-style-type: none"> • <i>AHCCHM304 Transport and store chemicals</i> • <i>AHCCHM307 Prepare and apply chemicals to control pest, weeds and diseases</i> 	<ul style="list-style-type: none"> • Face to Face • Online • Distance 	75

Interviewees

This includes all individuals (except students) present at interview during the entirety of the performance assessment (audit) process.

Full name	Position
Sarah Mosley	Chief Executive Officer
Angela Stewart	Training Manager
Melanie Moeller	Business Development Manager
Maureen Devine	Student Progress Officer
Joe Newbery	RTO Consultant

Details of Findings

Training and Assessment

Training and Assessment Strategies

Standards for RTO's 2015 - 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.

Clause 1.2

Finding: Compliant

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.

Minor deficiency

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

- The provider did demonstrate, for full qualifications, that an amount of training had been determined. However, the provider did not demonstrate for *AHCSS00074 Agricultural Chemical Skill Set*, that it has determined an amount of training to enable learners to meet the requirements for each unit of competency. Specifically:
 - The provider delivers *AHCSS00074 Agricultural Chemical Skill Set* online to individuals and to groups, face to face and via distance education. Each mode of delivery has a different duration, ranging from 5 to 9 hours for face to face, online self-paced 20 to 30 hours, distance 9 to 15 hours and online groups 6 to 9 hours. The strategies do not provide a rationale as to why the duration differs for each delivery method. All strategies state the following regarding the student cohort - '*Learners are farm workers who have experience in general chemical application which is directly applicable to these units.*'

The training and assessment strategies do not include a benchmark of how many hours are dedicated to training and how many hours are dedicated to assessment.

During the management interview, the Training Manager advised that for students studying face to face there is a component of pre-course study to be undertaken by students. The Training Manager acknowledged the need to clarify and define an amount of training for all delivery modes.

Standards for RTO's 2015 - 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.

Clause 1.3

Finding: Not 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

- Management interview conducted on 1 June 2023
- Trainer and assessor file – Ms Danielle Andersson
- ACTION PLAN - for transition to AHC release 9
- Learning Management System, RuralBiz Training Online
- Registration Details Chemical Redacted
- Student assessment records:
 - Student TP
 - Student WB

Evidence analysis

Providers must demonstrate that for all training products on its scope of registration, it has sufficient trainers and assessors, educational and support services, learning resources, and facilities and equipment, that are consistent with its training and assessment strategies.

The provider did demonstrate that it has educational and support services to meet the needs of the learner cohorts. However, the provider did not demonstrate it has sufficient trainers and assessors, learning resources and access to sufficient equipment. Specifically:

- Trainers and assessors

The evidence provided did not demonstrate the provider has access to sufficient trainers and assessors to deliver *AHC51222 Diploma of Community Coordination and Facilitation*. In particular, the trainer and assessor file submitted for delivery and assessment of the unit *AHCCCF507 Facilitate development of group goals and projects*, did not demonstrate that they meet the requirements of Clause 1.13. There were no other trainers and assessors nominated as delivering or assessing this unit of competency.

- Learning resources

The provider did not submit evidence to demonstrate that it has access to sufficient learning resources for release 9 of the sampled *AHC – Agriculture, Horticulture and Conservation and Land Management* training products.

The provider developed an action plan to transition AHC training products from Release 8 to Release 9 over a period of time. The plan details the required actions to be undertaken by the provider from January 2023. The action plan includes the submission of an add to scope application to ASQA in February 2023. The action plan includes the purchase of learning resources, and an analysis of these is noted to commence at the beginning of April 2023.

The action plan includes the requirement to review existing learning materials against the new requirements of the current training product versions and mapping the differences; however, no timeframe is allocated to this action item.

Within the provider's learning management system, for *AHCCCF507 Facilitate the development of group goals and projects*, it is noted that the unit is under development transition from AHCCCF502 – AHCCCF507.

During the management interview, the Chief Executive Officer advised that the provider is part-way through updating their training material.

- Facilities and equipment

The provider did not demonstrate that it ensures that students have access to sufficient equipment. In particular, students studying *AHCSS00074 Agricultural Chemical Skill Set* via online or distance education.

For example, as observed in the sampled student assessment records, 2 students submitted photographs taken directly from the internet in response to an assessment task requiring the student to demonstrate the practical application of their skills.

During the management interview, when asked how the provider ensures students have access to the equipment required, the Chief Executive Officer stated that they 'hope that students read the information on the website' and that 'most farms have this equipment'.

Following the management interview, the provider submitted information stating that a reasonable adjustment was applied for one of the students to submit pictures sourced from the internet as the student's circumstances changed and they were unable to access the equipment. Reasonable adjustment is applied to accommodate a students' temporary or permanent disability and should not compromise the integrity of the training product requirements and assessment process.

Furthermore, the provider did not provide a response as to why the second student had submitted photographs from the internet.

Performance assessment (audit) finding

The provider did not demonstrate it has sufficient trainers and assessors, learning resources and access to sufficient equipment.

Action required

The provider must:

- Ensure, it has sufficient trainers and assessors, learning resources and students have access to sufficient equipment that are consistent with the training and assessment strategies
- Demonstrate it has understood the causes of the issues.

- Establish and implement appropriate systems that are followed to ensure the provider has sufficient trainers and assessors, learning resources and that students have access to sufficient facilities and equipment that are consistent with the training package requirements and the provider's training and assessment strategies.

Trainers and Assessors

Standards for RTOs 2015 – 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.

Clause 1.13

Finding: Not Compliant

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:

- vocational competencies at least to the level being delivered and assessed;
- current industry skills directly relevant to the training and assessment being provided; and
- 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.

Key sources of evidence relevant to finding

- Management interview conducted on 1 June 2023
- Trainer and assessor files:
 - Reginald Kidd
 - Danielle Andersson

Evidence analysis

Providers must ensure that training and assessment is delivered only by persons who have vocational competencies at least to the level being delivered and assessed, current industry skills directly relevant to the training and assessment being provided, and current knowledge and skills in vocational training and learning that informs their training and assessment.

The provider did not demonstrate the sampled trainers and assessors possess the required vocational competencies, current industry skills and current knowledge and skills in vocational training and learning. Specifically:

- Reginald Kidd
 - AHCSS00074 Agricultural Chemical Skill Set*
 - Current knowledge and skills in vocational training and learning

The provider did not provide evidence to demonstrate current knowledge and skills in vocational training and learning.

During the management interview, the Chief Executive Officer acknowledged Mr Kidd's lack of professional development in vocational training and learning, and stated that the provider

was working on getting improvements in this space. Further evidence was requested to demonstrate current knowledge and skills in vocational training and learning; however, no further evidence was provided.

o Current industry skills leading to vocational competency

Evidence was submitted of Mr Kidd's qualifications and industry experience. Mr Kidd is actively involved in industry advisory bodies relevant to agricultural chemicals; however, the chemical certification for Mr Kidd had expired in 2016. The units of competency in this skill set note, *'State or territory licensing, legislative or certification requirements apply in some jurisdictions'*. The NSW Environmental Protection Authority states, *'competency must be maintained by renewing training every 5 years or participating in a quality assurance or stewardship program approved by the EPA.'*

The EPA NSW [website](#) notes under Maintaining competence and being reassessed every 5 years:

- *'All pesticide users must maintain their competence in pesticide use due to significant ongoing developments in:*
 - *the number of pesticides available*
 - *application technology*
 - *community expectations regarding pesticides management*
- *If pesticides users' application skills are not periodically reassessed, some users could:*
 - *develop poor practices*
 - *remain unaware of new techniques to manage pests*
 - *misapply pesticides, risking their health, the health of those around them, and the health of the environment.'*

The evidence did not demonstrate Mr Kidd has current industry skills directly relevant to the training and assessment being provided.

During the management interview, the Chief Executive Officer acknowledged that Mr Kidd's vocational currency had lapsed and stated that work was underway to update the required credentials.

Following the management interview on 1 June 2023, the provider submitted a completed Recognition of Prior Learning (RPL) assessment for Mr Kidd, dated 5 June 2023. Evidence collected to support the RPL assessment included a third-party statement completed by another trainer and assessor and a statement of attainment dated 16 March 2011, expiring on 9 March 2016. The evidence did not support current certification in handling chemicals or current industry experience.

The RPL assessment decision by the assessor acknowledged that Mr Kidd has extensive industry experience; however, the assessor advised:

- *"As Reg's accreditation in the AQF3 and AQF4 chemical certificates is more than 5 years out of date it is recommended that he apply to another RTO (eg. Smartrain, Chemcert etc.) for enrolment in these courses to upgrade both qualifications."*

The assessor confirmed in this statement that Mr Kidd does not have current industry skills directly relevant to the training and assessment being provided.

- Danielle Andersson

AHC51222 Diploma of Community Group Coordination and Facilitation

- Vocational competency and current industry skills

The evidence submitted did not demonstrate Ms Andersson has vocational competency and current industry skills in community group coordination and facilitation. Ms Andersson's CV indicates a history of participation in conservation land care groups; however, this experience is dated 2002-2005.

Performance assessment (audit) finding

The provider did not demonstrate that its training and assessment is only delivered by persons who have current industry vocational competencies at least to the level being delivered and assessed.

Action required

The provider must:

- Ensure trainers and assessors possess current vocational competencies at least to the level being delivered and assessed, current industry skills and current knowledge and skills in vocational training and learning.
- Demonstrate it has understood the causes of the issues.
- Establish and implement appropriate systems to ensure only trainers and assessors possessing vocational competencies at least to the level being delivered and assessed are used, with current industry skills and current knowledge and skills in vocational training and learning.

Assessment

Standards for RTOs 2015 – 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.

Clause 1.8

Finding: 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

- *AHCCHM304 Transport and store chemicals*
- *AHCCHM307 Prepare and apply chemicals to control pest, weeds and diseases*
 - Chemical Card Plus Marking Guide Ver 4.1
 - Chemical Card Plus Assessment Workbook Ver 4.1
 - Student assessment records:
 - Student TP
 - Student WB

- *AHCBUS518 Prepare and monitor budgets and financial reports*
 - AHCBUS518 Assessment workbook V2
 - AHCBUS518 Assessment task case study 1.82
- *AHCCCF507 Facilitate the development of group goals and projects*
 - ACTION PLAN - for transition to AHC release 9
 - Learning Management System, RuralBiz Training Online
- Recognition of Prior Learning
 - RBT RPL Handbook Ver 9.0
 - Trainer and assessor file – Mr Reginald Kidd
 - Reg Kidd-RPL Assessment record (trainers)
 - Third party report template sign
 - 2011_03_16 Octec Chemical Training exp 09032016
 - Statement of Attainment - Kidd, Reginald
- Management interview conducted on 1 June 2023

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.

An assessment system is a coordinated set of documented policies and procedures (including assessment materials and tools) that ensure assessments are consistent and are based on the Principles of Assessment and the Rules of Evidence.

The Principles of Assessment require that no matter which assessment pathway or method a provider uses, the principles of fairness, flexibility, validity and reliability must be met. The Rules of Evidence require that the evidence used to make a decision about competence must be valid, sufficient, authentic and current.

The evidence does not support that the provider has implemented an assessment system that ensures assessment complies with the assessment requirements of the relevant training package and is conducted in accordance with the Rules of Evidence.

The findings for clause 1.8 are separated into the following three categories:

- **Critical impact to vocational outcome**

The evidence obtained through ASQA's performance assessment indicates that students have not been appropriately assessed against the unit of competency requirements that could result in:

- harm to themselves or others within the industry
- student not meeting licensing/regulated industry requirements.

- **Substantial impact to vocational outcome**

The evidence obtained through ASQA's performance assessment does not demonstrate that the students possess the skills and knowledge to undertake the intended vocational outcome.

- **Lower impact to vocational outcome**

The findings of non-compliance do not immediately indicate an adverse impact on a student's skills and knowledge to perform the vocational outcomes of the unit of competency but do not align with all the requirements of the relevant training product.

The provider did not demonstrate that it has developed and implemented an assessment system that ensures assessment complies with the assessment requirements of the relevant training package and is conducted in accordance with the Principles of Assessment and Rules of Evidence.

In reviewing the provider's assessment system, student records, interviews and observations, the findings for Clause 1.8 fall into the following category:

- **Substantial impact to vocational outcome**

ASQA considers the following non-compliances as having substantial impacts to a student's vocational outcome as they may not possess the skills and knowledge to undertake the intended vocational outcome.

Evidence of non-compliant assessment practice includes:

AHCSS00074 Agricultural Chemical Skill Set

AHCCHM304 Transport and store chemicals

AHCCHM307 Prepare and apply chemicals to control pest, weeds and diseases

The provider does not ensure that it implements an assessment system that meets the Principles of Assessment and Rules of Evidence. The assessment tool does not demonstrate that it supports sufficiency, validity, and reliability.

Specifically:

The assessment tool does not capture sufficient evidence of students demonstrating the practical application of the required skills and knowledge to confirm competency.

The checklist for the practical tasks requires students to submit a series of photographs to demonstrate the application of their skills and knowledge. The photographic evidence on its own is not reliable as it does not confirm that the student being assessed conducted the required tasks. For example, 2 of the 9 non face-to-face students completed assessments sampled, consisted only of photographs obtained from the internet. The other 7 students included themselves in the photos with no other supporting evidence to confirm they actually conducted the task in practice themselves.

AHCCHM304 Transport and store chemicals includes the following requirements, for example, but not limited to:

- Performance Criteria:
 - '1.3 Ensure transport vehicle complies with transport regulations
 - 1.4 Ensure containers are secured, protected and in a condition to be safely transported according to workplace procedures, manufacturer instructions, legislative and regulatory requirements
 - 1.6 Ensure transport arrangements comply with legislative and regulatory requirements for the transport of hazardous substances
 - 2.1 Handle, transport and load chemicals according to chemical safety data information, chemical label, legislative and regulatory requirements'

- Performance Evidence:
 - 'There must be evidence that on at least one occasion the individual has demonstrated that they have safely transported and stored chemicals, including:
 - ensured transport vehicle meets regulations and that chemicals were loaded, secured and protected according to regulations and procedures
 - handled, transported and stored chemicals safely'.

The assessment task mapped to these requirements, required students to submit a photograph showing '*chemicals transported safely*'. Students provided a single photograph showing chemicals in the back of a utility vehicle. This does not confirm the student applied these skills in practice themselves.

AHCCHM307 Prepare and apply chemicals to control pest, weeds and diseases includes the following requirements, for example but not limited to:

- Knowledge Evidence:
 - 'characteristics of chemicals, their mode of action and relevance to chemical selection and use, including:
 - Eradicant'.
- Performance Criteria:
 - '2.2 Calculate the volume, rate or dose according to chemical label instructions
 - 2.3 Identify and select application equipment and set-up requirements according to application plan and operator instructions
 - 2.6 Select appropriate mixing equipment and suitable location to prepare and load chemicals according to workplace procedures
 - 2.8 Return unused chemical to store and clean preparation equipment and work site of residues and spillage according to chemical label instructions and workplace procedures'.
- Performance Evidence:
 - 'There must be evidence that the individual has on at least one occasion demonstrated the ability to safely prepare and apply chemicals ensuring they have:
 - identified and selected the chemical required for the target and calculated the amount and rates required according to chemical label
 - identified and selected application equipment and suitable location, and determined the set up parameters according to application plan and operator instructions
 - prepared and loaded chemicals and returned unused chemicals to store in accordance with label, application plan and workplace procedures
 - applied chemicals safely according to chemical labels, regulations and workplace procedures'.

The assessment task mapped to these requirements required students to submit a photograph showing 'Mixes Biffo using label instructions for mixing' and 'Applies Biffo safely'; students provided a photograph to show themselves holding a spray knapsack, and a jug filled with liquid. This does not confirm the student applied these skills in practice themselves.

For both units of competency:

- The combined checklist does not include observable behaviours that are to be demonstrated by students to ensure the tasks are being performed safely and competently. The evidence is not

sufficient in demonstrating the sampled students competently applied the skills and knowledge for the transportation, safe application and handling of chemicals in practice themselves.

- Furthermore, as students are not being assessed on all components of the unit of competency, the assessments are not collecting sufficient and valid evidence of a student's competency in accordance with the Rules of Evidence.

Where photographs have been produced from internet sources by students instead of their real work environment the assessment relied on for marking did not meet the Rules of Evidence. The provider's response advised that reasonable adjustment was applied for one of the two students as their circumstances changed and they no longer had access to the equipment. This is not considered reasonable adjustment as the student did not present with a temporary or permanent disability and the integrity of the course outcomes were not maintained as the evidence gathered did not meet the rules of validity, sufficiency and authenticity.

Recognition of Prior Learning

The provider has a Recognition of Prior Learning (RPL) system that when implemented would meet the Principles of Assessment and Rules of Evidence. The provider's RPL handbook details the process to be undertaken for assessment of qualifications on its scope of registration, the handbook does not detail the process for assessment recognition of prior learning for *AHCSS00074 Agricultural Chemical Skill Set*. All training and assessment strategies provided stated that full assessment via RPL is not recommended for this skill set.

Following the management interviews, the provider submitted an RPL assessment for its trainer and assessor, Mr Reginald Kidd.

Evidence collected to support the RPL assessment included a third-party statement completed by another assessor and a statement of attainment dated 16 March 2011, expiring on 9 March 2016. There was no evidence of current competency or industry experience collected relevant to the *Agricultural Chemical Skill Set*.

The RPL assessment decision by the assessor acknowledged that Mr Kidd has extensive industry experience; however, the assessor correctly identified and advised:

- *"As Reg's accreditation in the AQF3 and AQF4 chemical certificates is more than 5 years out of date it is recommended that he apply to another RTO (eg. Smartrain, Chemcert etc.) for enrolment in these courses to upgrade both qualifications."*

Mr Kidd was deemed competent and issued a statement of attainment despite the acknowledgement by the assessor of not meeting the rule of currency.

The RPL assessment undertaken for Mr Kidd did not meet the Principles of Assessment and Rules of Evidence, furthermore it did not meet the provider's own policies and procedures.

Performance assessment (audit) finding

The provider did not demonstrate its assessment systems are effective as they do not ensure:

- all assessment requirements of the sampled training products are met, and
- the Principles of Assessment and Rules of Evidence are applied in its assessment practices.

Action required

The provider must:

- Demonstrate it has understood the causes of the issues, rectified assessment practices (to comply with Clause 1.8) and has established appropriate systems that are followed. The evidence to be provided must:
 - demonstrate the provider will implement an assessment system that ensures assessment:
 - complies with the requirements of the relevant training products
 - will be conducted in accordance with the Principles of Assessment and Rules of evidence.
 - include the full suite of assessment tools for each unit of competency identified as non-compliant.

Minor deficiency

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

AHC50116 Diploma of Agriculture

AHCBUS518 Prepare and monitor budgets and financial reports

- Knowledge evidence:
 - 'Audience for financial reports, including:
 - Committees
 - Councils
 - Financial management systems used within the business
 - Standards for organisational recordkeeping and audit requirements'.

Completion

Standards for RTOs 2015 – Standard 3

The RTO issues, maintains and accepts AQF certification documentation in accordance with these Standards and provides access to learner records.

Clause 3.1

Finding: Not Compliant

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.

Key sources of evidence relevant to finding

- Management interview conducted on 1 June 2023
- Trainer and assessor file – Mr Reginald Kidd
 - Reg Kidd-RPL Assessment record (trainers)
 - Third party report template sign
 - 2011_03_16 Octec Chemical Training exp 09032016
 - Statement of Attainment - Kidd, Reginald

Evidence analysis

A provider must have systems in place to ensure qualifications and statements of attainment are only issued to students whom it has assessed as meeting the requirements of the training product.

The provider has not demonstrated that it has an appropriate system to ensure students are deemed competent and meet the requirements of the training product as specified in the relevant training package. Specifically:

- The provider's trainer and assessor, Mr Reginald Kidd, was deemed competent for *AHCSS00074 Agricultural Chemical Skill Set* and issued a statement of attainment on 6 June 2023. However, the RPL assessment undertaken for Mr Kidd did not meet the Rules of Evidence for sufficiency and currency. Furthermore, it did not meet the provider's own policies and procedures that detail RPL is not recommended for full assessment of the *AHCSS00074 Agricultural Chemical Skill Set*.

Performance assessment (audit) finding

The provider does not have an appropriate system to ensure that AQF certification documentation is only issued to a student whom it has assessed as meeting the requirements of the training product as specified in the relevant training package.

Action required

The provider must:

- Establish and implement appropriate systems that are followed to ensure that any AQF certification documentation is only issued to a student whom it has assessed as meeting the requirements of the training product as specified in the relevant training package.
- Demonstrate it has understood the causes of the issues.

Enrolment

Standards for RTOs 2015 – Standard 5

Each learner is properly informed and protected.

Clause 5.1

Finding: Not Compliant

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

Key sources of evidence relevant to finding

- RuralBiz Training Management Manual v10
- RuralBiz Training Student Handbook version 9.9
- Student enrolment records:
 - Student CA
 - Student CE
 - Student CB
 - Student GH
 - Student TP
- Management interview conducted on 1 June 2023

Evidence analysis

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

The provider did not demonstrate that it has a system in place to suitably assess the existing skills and knowledge of prospective students intending to undertake *AHCSS00074 Agricultural Chemical Skill Set*. Specifically, the Language Literacy and Numeracy (LLN) skills of each student to ensure the course selected is suitable for the student based on their existing skills and knowledge.

Specifically:

- The provider's enrolment process, as documented within the Training Management Manual, states students enrolling in Certificate IV, Diploma and Advanced Diploma and individual units are to undertake independent literacy and numeracy tests. Furthermore, the enrolment process states that it is a requirement that LLN testing emails be sent to all applicants.

The provider's entry requirements for Certificate III level courses state students must be able to demonstrate completion of year 10 or equivalent, or be able to demonstrate at least one year of relevant experience.

The Student Enrolment Journey flowcharts provided demonstrate for full qualifications that students undertake LLN testing; however, the requirement is not included in the Agricultural Chemical Skill Set flowchart.

The sample student enrolment records for students enrolled in *AHCSS00074 Agricultural Chemical Skill Set* confirm that LLN testing is not conducted.

Enrolment forms for 2 of the sampled students, demonstrate that the students have not undertaken education since completing schooling in over 65 years. Of which, one student stating their highest level of schooling completed was year 8 or below. The enrolment

documentation does not confirm that relevant experience was verified by the provider as required by the provider's course entry requirements.

The *NSW EPA APPROVED UNITS OF COMPETENCY AND COMPETENCY STANDARDS Pesticides Regulation 2017* advises:

- Pesticide users who have language or literacy difficulties and are unable to fulfil the requirements of the AQF3 units of competency can be deemed competent at AQF2 units of competency, so long as the users have successfully demonstrated competence at the AQF2 level. The unit of competency for an AQF2 level is *AHCCHM201 Apply Chemicals under Supervision*.

Performance assessment (audit) finding

The provider did not demonstrate that it provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.

Action required

The Provider must:

- Ensure that prior to enrolment or the commencement of training and assessment, whichever comes first, the provider advises prospective students about the training product appropriate to meeting their needs, taking into account their individual existing skills and competencies.
- Demonstrate it has understood the causes of the issues.
- Establish and implement appropriate systems to ensure new students will be enrolled into an appropriate training product, in consideration of their existing knowledge, experience and skills.

Regulatory Compliance and Governance

Staffing and Management

Standards for RTOs 2015 – Standard 2

The operations of the RTO are quality assured.

Clause 2.2

Finding: Not Compliant

The RTO:

- a) systematically monitors the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1; and
- b) systematically evaluates and uses the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices. Evaluation information includes but is not limited to quality/performance indicator data collected under Clause 7.5, validation outcomes, client, trainer and assessor feedback and complaints and appeals.

Key sources of evidence relevant to finding

- Management interview conducted on 1 June 2023
- RuralBiz Training Management Manual v10
- Findings provided in Clauses 1.2, 1.3, 1.8 and 1.13

Evidence analysis

Providers are responsible for monitoring and evaluating quality training and assessment strategies and practices that meet training package requirements. Systematic monitoring of internal systems, strategies and practices allow providers to respond quickly to changes in the marketplace or to stakeholder expectations. The outcomes of reviews are used to decide whether changes to the provider's strategies or practice are needed.

The provider did not demonstrate that it has sufficient systems in place to monitor training and assessment strategies and activities in accordance with Standard 1 or that it evaluates and uses the outcomes to continually improve its training and assessment strategies and practices. In particular:

- The provider's Training Management Manual includes a requirement for annual reviews of policies, processes, and outcomes by the Chief Executive Officer. However, evidence was not provided to demonstrate that systematic annual reviews are being implemented. The provider submitted an internal audit report conducted in March 2016, and an undated 'Internal audit and discussion' form. The evidence provided did not demonstrate that systematic monitoring is being conducted of internal systems, strategies, and practices resulting in the following:
 - Clause 1.2 – training and assessment strategies for *AHCSS00074 Agricultural Chemical Skill Set* do not include a benchmark of how many hours are dedicated to training and how many hours are dedicated to assessment.
 - Clause 1.3 – sufficient trainers and assessors have not been engaged to deliver the training and assessment. Learning resources for proposed add to scope items are not finalised. Furthermore, the provider is not ensuring that students undertaking training and assessment in individual units of competency or skill sets have sufficient access to facilities and equipment.

- Clause 1.8 - assessment tools do not ensure that students will be assessed in a manner that meets the Principles of Assessment and Rules of Evidence.
- Clause 1.13 – monitoring of the vocational competencies, current industry skills and current knowledge and skills in vocational training and assessment of the provider's trainers and assessors has not occurred. In particular:
 - The provider did not demonstrate vocational competency and industry currency for Mr Reginald Kidd. In New South Wales, competency of *AHCSS00074 Agricultural Chemical Skill Set* must be renewed every 5 years. Evidence collected to support Mr Kidd's RPL assessment demonstrates that certification expired on 9 March 2016. During the management interview, the Chief Executive Officer advised that they were aware that Mr Kidd's *AHCSS00074 Agricultural Chemical Skill Set* certification had lapsed.

During the management interview, the provider's representatives advised that formal internal audits are not conducted as standard practice, the last internal audit was conducted in 2018. The Chief Executive Officer demonstrated a commitment to improving systematic monitoring by conducting annual reviews and engaging an external consultant to assist approximately every 2 years.

Performance assessment (audit) finding

The provider did not demonstrate it applies appropriate systems to systematically monitor and evaluate its training and assessment strategies and practices and uses the outcomes to ensure ongoing compliance with Standard 1. As a result, the provider did not demonstrate it evaluates and uses the outcomes of evaluations to continually improve its training and assessment strategies and practices.

Action required

The provider must:

- Establish and implement appropriate systems to monitor training and assessment strategies and practices to ensure ongoing compliance with Standard 1.
- Demonstrate it has understood the causes of the issues.
- Establish and implement appropriate systems that it will follow to evaluate and use the outcomes to continually improve the provider's training and assessment strategies and practices.