Australian Government
Australian Skills Quality Authority

REPORT

Audit report: Australian Catholic University Limited

RTO number: 3578

CRICOS number: N/A

Date/s of audit: 13 November 2019

Date report created: 14 November 2019

Organisation details

Organisation's legal name:	Australian Catholic University Limited
Trading name/s:	Australian Catholic University ACU College
RTO number:	3578
CRICOS number:	N/A

Audit team

Lead auditor:	Paige O'Riley
Auditor/s:	N/A

Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0009998
Audit reason/s:	Compliance Monitoring
Address of site/s visited:	ACU College 115 Victoria Parade FITZROY VIC 3065 Australia
Date/s of audit:	13 November 2019
Organisation's contact for audit:	Shaun McDonagh Executive Director Shaun.McDonagh@acu.edu.au 07 3861 6224

Original finding at time of audit

Audit finding: Serious non-compliance
Report completed by: Paige O'Riley

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1*	Not compliant
Training and Assessment	1.1, 1.2, 1.3, 1.8*, 1.13	Not compliant

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

- Australian Catholic University Limited became a registered training organisation on 1 January 1996 under the Victorian Registration and Qualifications Authority. On 1 July 2011, the organisation's registration was transferred to ASQA
- the Executive Director, Mr Shaun McDonagh, is supported by the Finance Manager (Melbourne) and National Manager (Melbourne). The National Manager (Melbourne) oversees the Industry Engagement, Student Support, Learning & Teaching, Business Operations and Compliance Departments.

Scope of organisation's registration:

- *BSB51918 Diploma of Leadership and Management*
- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC30213 Certificate III in Education Support*
- *CHC33015 Certificate III in Individual Support*
- *CHC40213 Certificate IV in Education Support*
- *CHC50113 Diploma of Early Childhood Education and Care*
- *HLT33015 Certificate III in Allied Health Assistance*
- *HLT54115 Diploma of Nursing*
- *SIS30315 Certificate III in Fitness*
- *SIS40215 Certificate IV in Fitness*
- *HLTAID001 Provide cardiopulmonary resuscitation*
- *HLTAID002 Provide basic emergency life support*
- *HLTAID003 Provide first aid*
- *22237VIC Certificate II in General Education for Adults.*

Suburb and state of all delivery sites:

- Aberfeldie, VIC
- Ballarat, VIC
- Banyo, QLD
- Bendigo, VIC
- Bracken Ridge, QLD
- Echuca, VIC
- Epping, VIC
- Fitzroy, VIC
- Heidelberg, VIC
- North Sydney, NSW
- South Morang, VIC
- Sydenham, VIC
- Tarneit, VIC.

Third party usage:

- the organisation has four auspice agreements for VET in Schools. Currently, the auspice arrangements are located in Victoria only; however, the organisation is looking to establish VET in Schools in Queensland.

Core clients/target groups:

- the organisation primarily focuses on their industry based partnerships. These partnerships share similar ethos to the organisation, and provide employment pathways for their employees. In addition, the organisation targets the general public.

Training Revenue (Funded or fee for service):

- the organisation has state funding in Victoria and Queensland, as well as VET Student Loans for

Diploma and above qualifications. The organisation also enrols students under a fee for service arrangement.

Total number of current enrolments in the organisation as at audit date:
- 926.

In preparing the audit report, consideration has been given and reference made, where relevant, to:
- information provided by students as part of a student survey or interview
- information provided directly by Australian Catholic University Limited to ASQA
- existing information and records held by ASQA concerning Australian Catholic University Limited
- information provided to ASQA's auditors and documentation reviewed during the audit of Australian Catholic University Limited conducted on 13 November 2019
- other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
CHC50113 Diploma of Early Childhood Education and Care	Mixed	18
HLT54115 Diploma of Nursing	Mixed	362
HLT33015 Certificate III in Allied Health Assistance	Mixed	371
HLTAID003 Provide first aid	Face to face	41
BSB51918 Diploma of Leadership and Management	Face to face	28

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

Interviewees

Name	Position	Training products
Shaun McDonagh	Executive Director	N/A
Irene Nerantzoulis	Compliance Manager	N/A
Bianca Lang	Compliance Coordinator	N/A

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.

Original action required by Organisation

Australian Catholic University Limited did not meet all requirements for Clauses 1.8 and 4.1 of the Standards for RTOs.

Remedial action is required for the following training products:
- *CHC50113 Diploma of Early Childhood Education and Care*
- *HLT54115 Diploma of Nursing*
- *HLT33015 Certificate III in Allied Health Assistance*
- *HLTAID003 Provide first aid*
- *BSB51918 Diploma of Leadership and Management.*

The organisation is required to provide evidence that demonstrates:

Marketing and recruitment

- all information, whether disseminated directly by the organisation or on its behalf by third parties is now accurate and factual and addresses all of the requirements specified in Standards for RTOs Clause 4.1

- it has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all scope items who received marketing that was not accurate and factual. Remedial action needs to cover current students and students who enrolled with your organisation in the past six months.

Training and assessment

- it has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided <u>must</u>:
  - o include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant
  - o demonstrate the organisation will implement an assessment system that ensures assessment:
    - complies with the assessment requirements of the relevant training product(s)
    - will be conducted in accordance with the Principles of Assessment and Rules of evidence.

- it has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all scope items that were assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action needs to cover current students and students who were assessed by your organisation in the past six months.

Areas of non-compliance

Marketing/Recruitment Practices

Standards for RTOs Clause 4.1

*Original Finding: **Not compliant***

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

a) accurately represents the services it provides and the training products on its scope of registration;

b) includes its RTO Code;

c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;

d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;

e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;

f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;

g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;

h) includes the code and title of any training product, as published on the National Register, referred to in that information;

i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;

j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;

k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and

l) does not guarantee that:

   i) a learner will successfully complete a training product on its scope of registration; or

   ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or

   iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

CHC50113 Diploma of Early Childhood Education and Care

HLT33015 Certificate III in Allied Health Assistance

HLT54115 Diploma of Nursing

HLTAID003 Provide first aid

BSB51918 Diploma of Leadership and Management

The following evidence was reviewed:
- *BSB51918 Diploma of Leadership and Management*
  - Course Outline 2019
  - General Introduction Presentation (February 2019)
  - Office of Student Success Presentation (February 2019)
  - Learning Environment Online Orientation Presentation (February 2019).
- *CHC50113 Diploma of Early Childhood Education and Care*
  - Course Brochure (August 2019)
  - pathways into teaching for Ballarat and Melbourne (Victoria).

- *HLT33015 Certificate III in Allied Health Assistance*
  - o Course Brochure (June 2019).
- *HLT54115 Diploma of Nursing*
  - o Course Brochure (May 2019).
- *HLTAID003 Provide first aid*
  - o Course Brochure (October 2018).
- other
  - o website text for Cabrini (July 2018)
  - o poster targeting patients at Cabrini (July 2018)
  - o Marshall White Board for Cabrini / ACU College (July 2018)
  - o TV advertisement for Café screens
  - o ACU College / Cabrini Posters (July 2018)
  - o Cabrini website banners (July 2018)
  - o Cabrini intranet banners (July 2018)
  - o feature article for institute report
  - o Cabrini Staff Bulletin
  - o https://universityreviews.com.au/australian-rankings/best-nursing/
  - o news
  - o article in CONNECT (March 2018)
  - o ACU College Website links, including access to websites on 13 November 2019
  - o Undergraduate Course Guide 2020.

The organisation has not demonstrated that they provide accurate and accessible information to prospective and current students. For example, but not limited to:

- the organisation's marketing material does not contain the required codes and/or title information relevant to the training products being promoted and in accordance with the requirements of Clause 4.1. For example:
  - o the Undergraduate Course Guide 2020 does not have the code 'CHC50113' with the qualification title 'Diploma of Early Childhood Education and Care'
  - o the following forms of advertising do not have the qualification code 'HLT54115' when citing the 'Diploma of Nursing' qualification:
    - ▪ poster targeting patients at Cabrini (July 2018)
    - ▪ ACU College / Cabrini Posters (July 2018)
    - ▪ Cabrini website banners (July 2018).

- the organisation's marketing material does not consistently contain the required RTO code in accordance with the requirements of Clause 4.1. For example, the RTO code was not specified in:
  - o Pathways into teaching for Ballarat and Melbourne (Victoria) brochure
  - o Undergraduate Course Guide 2020
  - o ACU College VET courses website page – as at 13 November 2019.

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.8

*Original 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.**

Table 1.8.1 Principles of Assessment

| Fairness | The individual learner's needs are considered in the assessment process. |

	Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.
	The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.
Flexibility	Assessment is flexible to the individual learner by: • reflecting the learner's needs; • assessing competencies held by the learner no matter how or where they have been acquired; and • drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner. Validity requires: • assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance; • assessment of knowledge and skills is integrated with their practical application; • assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and • judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.

Table 1.8.2 Rules of Evidence

Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

CHC50113 Diploma of Early Childhood Education and Care
CHCECE004 Promote and provide healthy food and drinks
CHCECE009 Use an approved learning framework to guide practice

HLT33015 Certificate III in Allied Health Assistance
CHCCOM005 Communicate and work in health or community services
HLTAHA001 Assist with an allied health program

HLT54115 Diploma of Nursing
HLTENN007 Administer and monitor medicines and intravenous therapy
HLTENN012 Implement and monitor care for a person with chronic health problems

• The following evidence was reviewed:
   o assessment tools for:
      ▪ *BSB51918 Diploma of Leadership and Management*

- BSBLDR511 Develop and use emotional intelligence
  - assessment pack
  - marking guide.
- BSBMGT517 Manage operational plan
  - assessment pack
  - marking guide.
- CHC50113 Diploma of Early Childhood Education and Care
  - CHCECE004 Promote and provide healthy food and drinks
    - assessment pack – Cluster 2
    - marking guide – Cluster 2a
    - marking sheet assessment 2 (2a)
    - assessment 4 – Experience Exemplar
    - instructions for Practicum Assessors
    - Practical Placement Workbook (Excerpt)
    - Practical Placement Workbook marking guide.
  - CHCECE009 Use an approved learning framework to guide practice
    - assessment pack – Cluster 3 Professional Standards
    - marking guide – Cluster 3 Professional Standards
    - instructions for Practicum Assessors
    - Practical Placement Workbook
    - Practical Placement Workbook marking guide.
- HLT33015 Certificate III in Allied Health Assistance
  - CHCCOM005 Communicate and work in health or community services
    - assessment pack
    - marking guide.
  - HLTAHA001 Assist with an allied health program
    - assessment pack
    - marking guide.
- HLT54115 Diploma of Nursing
  - HLTENN007 Administer and monitor medicines and intravenous therapy
    - Assessment Cover Sheet
    - Online Quizzes 1 – 7
    - Knowledge Tests 1 – 4
    - Knowledge Test Marking Guides 1 – 4
    - Medication Calculation Test
    - Medication Calculation Test – Marking Guide
    - IV Calculation Test
    - IV Calculation Test – Marking Guide.
  - HLTENN012 Implement and monitor care for a person with chronic health problems
    - Online Quizzes 1 – 3
    - assessment pack
    - marking guide.
- HLTAID003 Provide first aid
  - assessment pack
  - marking guide
  - MCQ Knowledge Test.
- Student files:
  - BSB51918 Diploma of Leadership and Management
    - academic files
      - LM.
    - administration files
      - LM
      - NH
      - SR.
  - CHC50113 Diploma of Early Childhood Education and Care
    - academic files
      - BT

- o CO.
  - administration files
    - o BT
    - o CO
    - o GM
    - o SL.
- *HLT33015 Certificate III in Allied Health Assistance*
  - academic files
    - o CK
    - o JP
    - o RF
    - o TD – credit transfer documentation.
  - administration files
    - o BH
    - o CK
    - o CM
    - o EB
    - o IB
    - o JP
    - o MM
    - o RF
    - o TD.
- *HLT54115 Diploma of Nursing*
  - administration and academic files – including placement documentation
    - o AB
    - o AL
    - o AO – includes Certificate and Academic Transcript – dated 23 July 2019, certificate number 12360
    - o CB – includes Certificate and Academic Transcript – dated 23 September 2019, certificate number 12607
    - o LK
    - o NJ – includes Certificate and Academic Transcript – dated 10 September 2019, certificate number 12562
    - o PP
    - o SK
    - o TS – includes Certificate and Academic Transcript – dated 19 July 2019, certificate number 12340.
- *HLTAID003 Provide first aid*
  - administration and academic files
    - o DP – includes Statement of Attainment – dated 10 June 2019, certificate number 12283
    - o JD – includes Statement of Attainment – dated 10 July 2019, certificate number 12342
    - o PS – includes Statement of Attainment – dated 10 July 2019, certificate number 12349
    - o MC – includes Statement of Attainment – dated 18 July 2019, certificate number 12397
    - o SC – includes Statement of Attainment – dated 18 July 2019, certificate number 12398
    - o NC – includes Statement of Attainment – dated 23 July 2019, certificate number 12435.

The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system for each unit of competency for all non-compliances and provide evidence:
- of a revised assessment system for each unit of competency that addresses all requirements of Clause 1.8.

The organisation has not demonstrated they have implemented an assessment system that ensures that assessment complies with the assessment requirements of the relevant training package and is conducted

in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:

- the organisation has adopted a graded approach for *HLT54115 Diploma of Nursing*, as indicated by the Academic Transcripts provided for students CB, NJ, AO and TS. Although the trainers '*ensure that all requirements have been met*' when making an assessment decision, the marking guide does not set out what is a competent answer, as opposed to a credit or distinction. Therefore, as the *HLT54115 Diploma of Nursing* assessment tools do not provide an outline for grading, it cannot be confirmed that every student has meet the requirements of the training product.

- Validity and sufficiency – the assessment practices do not demonstrate that the organisation ensures they have gathered enough evidence to make a valid judgement of competence and that it is directly related to the competency being assessed. Therefore, it cannot be confirmed the below students have achieved competence for the relevant unit of competency. For example:
  o *CHCCOM005 Communicate and work in health or community services* and *CHCCCS020 Respond effectively to behaviours of concern* (*HLT33015 Certificate III in Allied Health Assistance*) – students were marked as satisfactory where they did not address all parts of the question. For example:
    - Question 1H 'Describe how you could negotiate a new timeframe for the report and state two (2) reasons why the extension would be necessary'
      - CK response – 'the extension would be necessary and assessment would be affected'
      - RK response – 'the term is finishing later then they want the report which isn't consistent. Your progress report will be affected as you don't have enough time to give an accurate report (progress) on client'.

      Both answers provided by Students CK and RK did not address how they would negotiate a new timeframe for the report. In addition, Student CK did not state two reasons why the extension would be necessary.
  o *CHCECE004 Promote and provide healthy food and drinks* (*CHC50113 Diploma of Early Childhood Education and Care*) – Based on the feedback provided by Assessors, it did not appear that student answers were satisfactory and met the benchmark requirement. However, the student assessment tools are marked satisfactory. For example:
    - CO was provided with the following trainer feedback for the Play Experience Plan:
      - 'what type of examples are you referring to'
      - 'I am not sure where the animal types fit into your experience about learning about good nutrition?'
      - 'please find time to see me next week so we can go through your plan together and make some adjustments'.