



Australian Government

Australian Skills Quality Authority

REPORT

Audit report: Early Childhood Training Pty Ltd

RTO number:	90900
CRICOS number:	N/A
Date/s of audit:	4 and 5 February 2020
Date report created:	6 February 2020

Organisation details

Organisation's legal name:	Early Childhood Training Pty Ltd
Trading name/s:	Childcare Management Systems Australia CMS Training
RTO number:	90900
CRICOS number:	N/A

Audit team

Lead auditor:	Gavin Treacy
Auditor/s:	N/A

Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0010216
Audit reason/s:	Compliance Monitoring
Address of site/s visited:	235 Hawthorn Rd CAULFIELD NORTH VIC 3161 Australia
Date/s of audit:	4 and 5 February 2020
Organisation's contact for audit:	Sam Rosenberg Chief Executive Officer sam@childcarems.com.au 1300139778

Original finding at time of audit

Audit finding: Concerning non-compliance

Report completed by: Gavin Treacy

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

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

- The organisation's initial registration was the 9 September 2003. In 2015, CMS training Pty Ltd purchased the RTO Recovre, which predominantly delivered training and assessment in Work Health and Safety. However, on purchase from Recovre to CMS training Pty Ltd, teach out occurred for current enrolments and then removed these from scope and Early Childhood added to scope of registration. In February 2019, CMS training Pty Ltd changed their legal name to Early Childhood Training. Sam Rosenberg and Megan Sharman are owner and executive owner. Sam an accountant (non-practicing) also has a consultancy service for people seeking to enter the childcare services sector and a board member for Australian Childcare Alliance Victoria. Megan looks after the operational aspect of training and assessment arm of the business.

Scope of organisation's registration:

- CHC30113 Certificate III in Early Childhood Education and Care
- CHC50113 Diploma of Early Childhood Education and Care.

Suburb and state of all delivery sites:

- 235 Hawthorn Rd Caulfield North VIC 3161
- Workplace.

Third party usage:

- N/A.

Core clients/target groups:

- Domestic student.

Training Revenue (Funded or fee for service):

- Government funding (Skills First)
- Fee for service.

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

- 96.

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 Early Childhood Training Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Early Childhood Training Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Early Childhood Training Pty Ltd conducted on 04 Feb 2020.
- 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
<i>CHC30113 Certificate III in Early Childhood Education and Care</i>	Workplace	20
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Workplace	76

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

Interviewees

Name	Position	Training products
Sam Rosenberg	CEO	All
Megan Sharman	Director of education / trainer	All
Sarah Darcy	Trainer / assessor	All
Baz Ilseven	Trainer / assessor	All

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

Early Childhood Training Pty Ltd did not meet all requirements for clauses:

Standards for RTO's, Clauses 1.1, 1.2 and 1.8.

The organisation is required to provide evidence that demonstrates:

Standards for RTOs Clause 1.1 and 1.2

- the organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided.
- the organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the industry area sampled that were impacted by training and assessment practices that did not meet the requirements of the training product (including amount of training). Remedial action needs to cover current students and students who enrolled or completed with your organisation in the past three months.

Standards for RTOs Clause 1.8

- the organisation 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 must:
 - include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant
 - 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.
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the industry area sampled 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 three months.

Areas of non-compliance

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.1

*Original Finding: **Not 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.

Standards for RTOs Clause 1.2

*Original Finding: **Not 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.

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- The following evidence was reviewed:
 - training and assessment strategies
 - Megan Sharman – Interview
 - Sarah Darcy – Interview
 - Baz Ilseven – Interview
 - enrolment confirmation letter
 - centre audit
 - workplace checklist.
- The documented training and assessment strategy for delivery of the above training product is not consistent with the organisation's demonstrated practice. Specifically:
 - entry requirements require the students to acquire a working with children check prior to commencing work in industry. Megan Sharman informed that prospective students are required to have employment in the childcare sector prior to enrolment. However, the training and assessment strategy does not inform this nor how the organisation will support the prospective student in acquiring employment in childcare.
 - does not inform the target cohort and differentiate between a domestic student and/or a traineeship.
 - does not inform the trainer and assessor ratio to student for workplace visits.
- The organisation has not identified a target student cohort within its documented training and assessment strategy for the above training product. Accordingly, it could not be confirmed that the strategy enables each student to meet the requirements for each unit of competency in which they are enrolled. Specifically:
 - delivery mode in the enrolment confirmation letter has part time study of 20 hours study per week, however this is not consistent with the training and assessment strategy.
 - mode of study is offered using a blended learning approach and self-paced in the workplace. However, the training and assessment mode is conducted at the workplace

- training and assessment is conducted in the workplace and the suitability of the childcare facilities where the student is undertaking employment is confirmed by a facilities and WHS assessment of the venue. This is conducted prior to commencing the program by a Memorandum of Understanding (MOU) with centre and workplace checklist. However only a workplace checklist was produced at audit and no MOU was sited for individual centres.
- The organisation's documented training and assessment strategy does not separate training from assessment; therefore, it cannot be confirmed what the actual amount of training is. For example, but not limited to:
 - training and assessment matrix has a training mode of workplace and self-paced. The delivery sequence, for example *CHC30113* is five units over 12 weeks approximately for a training period of 12 to 24 months. The trainer and assessor visits the student every four to five weeks between two to four hours. During interviews with the trainer and assessor it was confirmed that assessment was occurring, therefore, it cannot be confirmed what the actual training is occurring during these visits.

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	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>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.</p>
Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none"> • 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	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none"> • 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	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>

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.

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- The following evidence was reviewed:
 - student assessments:
 - C.C
 - M.C
 - T.P
 - T.B
 - B.P
 - T. B
 - S.S
 - L.B
 - C.F
 - K.M
 - L.S
 - S.T
 - H.W.
 - Megan Sharman (Interview)
- 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 identified below and provide evidence:
 - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
 - that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
 - student P.B for unit *CHCECE016* and *HLTWHS003*, Workplace Visit Form, dated 30 October 2018, the summary of discussion with the supervisor is not confirmed, signed and dated by the supervisor and student. At audit ASQA was advised that all visits and correspondence of the students training and assessment is updated by the trainer and assessor on the organisations Student Management System Vetrack. However, entries on VETrack for P.B were 1 March, 29 April 2019 and 15 May 2019. It cannot be substantiated that the visit actually occurred on 30 October 2018.
 - student C.F for *CHCECE002* assessment task five, the student is required to provide a portfolio of work caring for the health and safety of children. The portfolio covers a number of areas where an educator needs to care for the safety and health of children. The areas are:
 - Part A: Quiet play activities

- Part B: Children's privacy
- Part C: Teaching children about safety
- Part D: Medication
- Part E: Allergies
- Part F: Asthma
- Part G: Keep a safe and clean environment
- Part H: Teaching children about health and hygiene.

All areas of the portfolio were not sighted and signed by the supervisor. Therefore, it cannot be determined if the assessment actually occurred in the presence of the supervisor and validated by the trainer and assessor.