

REPORT

Audit report: Rise Education & Training Pty Ltd

RTO number:91823CRICOS number:N/ADate/s of audit:04 Jun 2019 - 04 Jun 2019Date report created:6 June 2019Date report updated:6/06/2019

Organisation details

Organisation's legal name:	Rise Education & Training Pty Ltd
Trading name/s:	Rise Education & Training
RTO number:	91823
CRICOS number:	N/A

Audit team

Lead auditor:	Mark Shrubshall
Assistant/s:	N/A

Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0009352
Audit reason/s:	Compliance Monitoring
Address of site/s visited:	Unit 4 322 Old Cleveland Rd COORPAROO QLD 4151 Australia
Date/s of audit:	04 Jun 2019 - 04 Jun 2019
Organisation's contact for audit:	Lifang Xiao Chief Executive Officer lily_xiaoer@hotmail.com 07 3108 4133

Original finding at time of audit

Audit finding: Serious non-compliance Report completed by: Mark Shrubshall

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

*Indicates a non-compliant clause

Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 23/07/2019: Compliant Report completed by: Mark Shrubshall

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1	Compliant
Enrolment	5.1	Compliant
Training and Assessment	1.1, 1.2, 1.8, 1.13	Compliant
Completion	3.1	Compliant

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

• The organisations management structure consists of Chief Executive Officer, Operations Manager, Trainer and Assessor, Student Officer/Admin, Industry Advisor,

Scope of organisation's registration:

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

The organisation submitted two applications on 02/04/2019 and 5/04/2019 to have the following items on scope removed

- BSB40215 Certificate IV in Business
- BSB51915 Diploma of leadership and Management
- BSB51918 Diploma of Leadership and Management
- BSB30115 Certificate III in Business
- 10362NAT Certificate I in Spoken and Written English

Suburb and state of all delivery sites:

• Delivery is based in Queensland

Third party usage:

The organisation does not use third parties for the delivery and assessment of its scope of registration

Core clients/target groups:

• Consist of new entrants and existing workers in the childcare industry

Training Revenue (Funded or fee for service):

Government funded and some fee for service

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

• 30 active students

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 Rise Education & Training Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Rise Education & Training Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Rise Education & Training Pty Ltd conducted on 04 Jun 2019 04 Jun 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
CHC30113 Certificate III in Early Childhood Education and Care	Face to face	8
CHC50113 Diploma of Early Childhood Education and Care	Face to face	22

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

Interviewees		
Name	Position	Training products
Lifang Xiau	Chief Executive Officer	NA
Ray Chua	Operations Manager	NA
Lee Gane	Industry Adviser	NA
Janice de la Rosa	Trainer and Assessor	CHC30113 Certificate III in Early Childhood Education and Care
		CHC50113 Diploma of Early Childhood Education and Care

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

Rise Education & Training Pty Ltd did not meet all requirements for clauses 1.1, 1.2, 1.8, 1.13, 3.1, 4.1 & 5.1

Remedial action is required for the following training products:

CHC50113 Diploma of Early Childhood Education and Care

CHCECE005 Provide care for babies and toddlers CHCECE007 Develop positive & respectful relationships with children

CHC30113 Certificate III in Early Childhood Education and Care

CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety CHCECE03 Provide care for Children

The organisation is required to provide evidence that demonstrates:

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 training product 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.

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 <u>must</u>:
 - Include the full suite of assessment tools for each unit of competency identified as noncompliant
 - 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 carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product 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

Clause 1.13

- The trainers/assessors currently used by the organisation meet the requirements of the standards in particular (Clause 1.13b)
- The organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product 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

Clause 3.1

- The organisation now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course
- The organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product 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

Clause 4.1

- All information, whether disseminated directly by the organisation is now accurate and factual and addresses all of the requirements specified in Standards for RTOs Clause 4.1
- The organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product 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

Clause 5.1

- The organisation now has appropriate systems that are followed to ensure new learners are enrolled into an appropriate training product, considering their existing knowledge, experience and skills that complies with Standards for RTOs Clause 5.1
- The organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product 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

Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by Rise Education & Training Pty Ltd on 23/07/2019, the organisation:

- provided sufficient evidence to demonstrate compliance with:
- Standards for RTOs:

1.1, 1.2,1.8, 1.13,3.1,4.1 & 5.1

Areas of non-compliance

Marketing/Recruitment Practices

Standards for RTOs Clause 4.1

Original Finding: Not compliant

Finding following additional evidence: 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
- I) 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 CHC30113 Certificate III in Early Childhood Education and Care

The following was reviewed in relation to marketing and recruitment practices:

- Training and assessment strategy CHC50113 Diploma of Early Childhood Education and Care
- Training and assessment strategy CHC30113 Certificate III in Early Childhood Education and Care
- Website

The organisations marketing and recruitment practices are not compliant with the requirements of Clause 4.1 of the Standards for Registered Training Organisations (RTOs) as:

• The organisation's marketing material does not align with its demonstrated practice. For example:

CHC50113 Certificate III in Early Childhood Education and Care

- The marketing material identifies the course duration as 9-24 months however, it does not inform the prospective student the shorter period is a fast track route and attendance is 5 days per week rather than the 24-month pathway, which requires attendance of 1 day per week.
- The marketing material does not align to the strategy which identifies the delivery period as 12 to 24 months

CHC50113 Diploma of Early Childhood Education and Care

- The marketing material identifies the course duration as 12-24 months however, it does not inform the prospective student the shorter period is a fast track route and comes with certain condition such as attending 5 days per week rather than the 24-month pathway, which requires attendance of 1 day per week.
- The marketing material does not align to the strategy which identifies the delivery period as 12 to 18 months

Analysis of additional evidence

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

- The following additional evidence was reviewed:
 - Marketing Flyer
 - o Website
 - o Google Advertisement
 - CHC50113 Diploma of Early Childhood Education and Care
 - o CHC30113 Certificate III in Early Childhood Education and Care
 - Course Guide
 - Student Handbook
 - o Activity Management Plan
 - o Marketing register
- The organisation has addressed the non-compliance for future students.
- The organisation has planned sufficient remedial action to identify and address the impact the noncompliance may have caused students.

Enrolment

Standards for RTOs Clause 5.1

Original Finding: Not compliant

Finding following additional evidence: 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.

CHC30113 Certificate III in Early Childhood Education and Care

Australian Skills Quality Authority Audit report – Rise Education & Training Pty Ltd

CHC50113 Diploma of Early Childhood Education and Care

The following evidence was reviewed:

- Pre enrolment form
- Enrolment form
- Higher level Skills fact sheet
- Complaints
- o Refunds form
- Student handbook
- The organisation has not demonstrated that prospective students will receive advice about its delivery of training and conduct of assessment appropriate to meeting their needs. For example,:

Student handbook under the heading 'Assessment' (Page 8 of 19) states:

Your training will depend on your study mode whether you are classed based, external or service based

- Classroom: this requires the student to attend class either part time or full time. The trainer Assessor leads the student through the course or unit.
- External; students receive theory assessment , Practical assessment and also a USB which contains readings activities Students are able to study at a time and place convenient to them. All external students have a trainer and assessor who provides support, on the job training and assessment

The organisation confirmed that they do not provide delivery for external students; only face to face.

The information is misleading to prospective students.

Analysis of additional evidence

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

- The following additional evidence was reviewed:
 - Expression of interest/ Eligibility form
 - o Student Handbook
 - Student Application and Enrolment
 - o Suitability form
- The organisation has addressed the non-compliance for future students.
- The organisation has planned sufficient remedial action to identify and address the impact the noncompliance may have caused students.

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.1

Original 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.

Standards for RTOs Clause 1.2

Original Finding: Not compliant

Finding following additional evidence: 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:

- o CHC30113 Certificate III in Early Childhood Education and Care training and assessment strategy
- o CHC50113 Diploma of Early Childhood Education and Care training and assessment strategy
- The organisation's documented training and assessment strategy does not describe arrangements for delivery of the above training product which would enable each student to meet the requirements for each unit of competency in which they are enrolled. Specifically:
 - The training and assessment strategy provides a list of units included in the qualification however it does not identify a framework for delivery or assessment, for example but not limited to:
 - A sequence in which the units are delivered and which ones must be completed prior to work placement.
 - At what stage students are able to start work placement
 - The number of visits and when the assessor will attend the work placement
 - Under the heading Assessment Resources it states:
 - Assessment will be formative and conducted so that skills, knowledge and understanding may be demonstrated in the simulated workplace environment. Assessment of knowledge and skills will be integrated with their assessment of their practical application

The strategy does not inform the reader how it ensures that the simulated environment simulates the real-life working environment where skills and knowledge would be performed, with all the relevant equipment and resources of that working environment as required in the training package.

It is also unclear how the organization ensures that a simulated environment used in multiple locations would be managed to ensure consistency.

- The evidence provided does not describe when assessment will occur. For example, but not limited to:
 - \circ The training and assessment strategy under the heading assessment resources states that:
 - Projects/tasks and work evidence will be progressively gathered by the assessor for units of competency until sufficient valid evidence is gathered to make assessment decisions on competency. Evidence of skills and knowledge will be gathered simultaneously

The lack of clear structure for assessment does not support an exit strategy for a student that does not complete all the units and finishes early. The student does not know what they can be potentially awarded at any possible exit point in the course therefore is potentially being disadvantaged.

In addition, the lack of structure could place student and children at the center at risk when on work placement. For example, the strategy does not indicate if the students must have completed and passed the HLTAID004 Provide an emergency first aid response in an education and care setting prior to attending work placement in a childcare center

• 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.

Analysis of additional evidence

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- The following additional evidence was reviewed:
 - CHC30113 Certificate III in Early Childhood Education and Care training and assessment strategy
 - CHC50113 Diploma of Early Childhood Education and Care training and assessment strategy
- The organisation has addressed the non-compliance for future students.
- The organisation has planned sufficient remedial action to identify and address the impact the noncompliance may have caused students.

Standards for RTOs Clause 1.8

Original Finding: Not compliant

Finding following additional evidence: 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	l
	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. Evidence presented for assessment is consistently interpreted and assessment results Reliability 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

CHCECE005 Provide care for babies and toddlers

CHCECE007 Develop positive & respectful relationships with children

CHC30113 Certificate III in Early Childhood Education and Care

CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety CHCECE03 Provide care for Children

- The following evidence was reviewed:
 - o Master assessment tools theory
 - Master assessment tools practical
 - o Benchmarking
 - Completed student files
- The assessment tools do not address all unit of competency requirements. For example, but not limited to:
 - Knowledge Evidence:
 - o CHCECE005 Provide Care for babies and toddlers
 - Food safety guidelines
 - Recommendations for oral health, including restricting bottles, meal times only
 - Brain development in babies and toddlers
 - o CHCECE003 Provide care for children
 - Recommendations for physical activity for 5-12 year-olds in the national Physical Activity Guidelines for Australians
- Theory assessment tools are structured to provide students with the answer.

This is a systemic issue across the scoped units viewed at audit and the organisation advised that as assessment tools were purchased it would be found in all unit in both qualifications. For example but not limited to.

• CHCECE005 Provide care for babies and toddlers

Question 8

To complete this task refer to (155-156) of your textbook The Big Picture List the five key procedures for infection control

Suggested answers (benchmarking)

- Regular cleaning regime
- Hand washing
- Health screening
- Monitor children's immunisation status
- Managing illness

This is the exact list found on the bottom of page 155 and the top of page 156

Completed student files confirmed an exact copy of the benchmarking / list from the textbook. The question leads the student to the answer and therefore it does not test the students' knowledge.

Reliability of the assessment is called into question

Work placement.

All units

• The supervisor report consists of a checklist, which contains unit code/title and performance evidence.

The supervisor report states that:

The nominated workplace supervisor will verify the skills of the student in the workplaces via the Supervisor report. The supervisor must hold a qualification equal or higher than the qualification the student is enrolled in who is willing to provide support <u>and verify competency</u>.

The documentation suggests that the supervisor is required to verify competence in the workplace against unit requirements. Therefore, the supervisor is being asked to assess the student's competence in the workplace against the training package requirements. Taking on the role of the trainer and assessor.

The organisation does not ensure that the supervisor meets the requirements of the relevant standard 1.13-1.16 of the Standards for registered Training Organisations (RTOs) 2015.

Analysis of additional evidence

CHC50113 Diploma of Early Childhood Education and Care

CHCECE005 Provide care for babies and toddlers CHCECE007 Develop positive & respectful relationships with children

CHC30113 Certificate III in Early Childhood Education and Care

CHCDIV002 Promote Aboriginal and/or Torres Strait Islander cultural safety CHCECE03 Provide care for Children

- The following additional evidence was reviewed:
 - CHCECE003 TheoryTasks v7
 - CHCECE003 WP Tasks v7
 - CHCECE005 Theory Task v7
 - CHCECE005 WP Task v7
 - Additional Questions ECE003 and ECE005v
 - CHCECE003 validation assessment report
 - CHCECE005 validation assessment report
 - Annual Moderation and Validation Plan
 - Validation Annual Plan 2019-2023
 - Cert III ECEC Validation of Assessment tools and judgements HLTWHS001
 Participate in WHS
 - HLTAID004 validation assessment report
 - CHCECE001-CHCDIV002 Theory Tasks Trainer v7
 - CHCECE001-CHCDIV002 WP Tasks Trainer v7
 - CHCECE003 Theory Tasks Trainer v7
 - CHCECE003 WP Tasks Trainer v7
 - CHCECE005 Theory Task Trainer v7
 - CHCECE005 WP Trainer Task v7
 - CHCECE007 Theory Tasks Trainer v7
 - CHCECE007 WP Trainer Task v7
 - Physical Resources Checklist
 - Validation Plan
 - Validation Report CHCECE003 & CHCECE005
 - Validation of Assessment Tools and Judgements
 - Redress Strategic Plan
 - Redress Student Observation
 - Redress Student Assessment
 - Trainer and Assessor Resource kit

- The organisation has addressed the non-compliance for future students.
- The organisation has planned sufficient remedial action to identify and address the impact the noncompliance may have caused students.

Trainer and assessor competency

Standards for RTOs Clause 1.13

Original Finding: Not compliant

Finding following additional evidence: 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:

- a) vocational competencies at least to the level being delivered and assessed;
- b) current industry skills directly relevant to the training and assessment being provided; and
- c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

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

- The following evidence was reviewed:
 - o Qualifications
 - o HR files
 - The organisation did not provide sufficient evidence to demonstrate that the below listed trainer and assessors possess relevant industry currency: Janice De la Rosa

Analysis of additional evidence

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

Janice De la Rosa

- The Qualifications
- Industry Currency
- Trainer Matrix
- VET Professional Development
- The organisation has addressed the non-compliance.

Completion

Standards for RTOs Clause 3.1

Original Finding: Not compliant

Finding following additional evidence: 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.

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

- The following evidence was reviewed:
 - Student issuance data
 - Completed student files
- The organisation has not demonstrated that its assessment system complies with the Principles of Assessment and Rules of Evidence (refer to non-compliance identified with Clause 1.8) with respect to students who were assessed as meeting the requirements of the training product and were issued with AQF certification documentation.

Analysis of additional evidence

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

- The following additional evidence was reviewed:
 - Activity Management Plan
 - o Policy and Procedure Continuous improvement and Quality Practice
 - o Complaints and Appeals Register
 - o Internal VET Delegations
 - o Compliance Register
 - Continuous Improvement Register
- The organisation has addressed the non-compliance for future students.
- The organisation has planned sufficient remedial action to identify and address the impact the noncompliance may have caused students.