



REPORT

Audit report: Precision Training Australia Pty Ltd

RTO number:	91808
CRICOS number:	N/A
Date/s of site visit:	N/A
Date report created:	28/08/2020

Provider details

Provider's legal name:	Precision Training Australia Pty Ltd
Trading name/s:	Precision Training Australia Pty Ltd
RTO number:	91808
CRICOS number:	N/A

Audit team

Lead auditor:	Sharyn Gillick
Auditor/s:	Karen Noble

Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0010701
Audit reason/s:	Compliance Monitoring
Date of opening meeting/discussion	20/08/2020
Date of closing meeting/discussion	21/08/2020
Provider's contact for audit:	Zeeshan Rana Chief Executive Officer shan.rana@kirana.edu.au 1300 885 791
Address/es of site/s visited (if applicable):	N/A – desk audit

Summary of audit findings

Audit finding: Concerning non-compliance

Report completed by: Sharyn Gillick

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

*Indicates a non-compliant clause

Background

Summary of provider and management structure:

- Precision Training Australia Pty Ltd began operations as a registered training organisation in February 2011 and delivered traineeships in New South Wales under state funding arrangements. After a change of ownership, in 2015 the RTO began to operate under the branding of Kirana Colleges.
- Kirana Education operates two subsidiary brands – Kirana Colleges and Kirana Workforce Development. Kirana Colleges operates three separate entity RTOs – Precision Training Pty Ltd, Maxis Solutions Pty Ltd and Collaboration Learning Pty Ltd.
- Each RTO is managed by the same team of management staff, administration and trainers and assessors. Precision Training Australia Pty Ltd currently delivers training and assessment in Queensland under a state funding contract, which has recently been renewed.
- Management structure includes:
 - CEO - Zeeshan Rana
 - Andrew Croft – Quality Assurance Manager
 - Kevin Smalley – QLD Compliance Manager
 - QLD Operations Manager
 - Administration staff
 - Trainers/assessors

Scope of provider's registration:

- CPC20112 Certificate II in Construction
- CPP30316 Certificate III in Cleaning Operations
- FBP20117 Certificate II in Food Processing
- FBP30117 Certificate III in Food Processing
- MSM20116 Certificate II in Process Manufacturing
- MSM30116 Certificate III in Process Manufacturing
- PMA30116 Certificate III in Process Plant Operations
- PMA40116 Certificate IV in Process Plant Technology
- RII20115 Certificate II in Resources and Infrastructure Work Preparation
- TLI20419 Certificate II in Warehousing Operations
- TLI21616 Certificate II in Warehousing Operations
- TLI30319 Certificate III in Supply Chain Operations
- TLI31616 Certificate III in Warehousing Operations
- HLTINFCOV001 Comply with infection prevention and control policies and procedures

Suburb and state of all delivery sites:

- Browns Plains, QLD
- Strathpine, QLD
- Temporary hire venues in south east QLD and far north QLD.

Third party usage:

- Not applicable.

Core clients/target groups:

- Job seekers.

Training Revenue (Funded or fee for service):

- Funded.

Total number of current enrolments in the organisation as at 20/08/2020:

- 129.

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 Precision Training Australia Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Precision Training Australia Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the desk audit of Precision Training Australia Pty Ltd conducted on 20/08/2020.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

Training products sampled

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>MSM30116 Certificate III in Process Manufacturing</i>	Face to face, Mixed,	121
<i>FBP30117 Certificate III in Food Processing</i>	Face to face, Mixed, Workplace	2

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

Interviewees

Name	Position	Training products
Andrew Croft	Quality Assurance Manager	MSM30116, FBP30117
Kevin Smalley	Compliance Manager	MSM30116, FBP30117

About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting a non-compliance may require:

- correcting a process or system that has led to the non-compliance, and implementing a revised process or system
- identifying the impact on learners and carrying out remedial action for current and past learners

Areas of non-compliance and action required

Training and Assessment

Training Delivery and Assessment

Standards for RTOs - Standard 1

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

Clause 1.8

Audit 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

MSM30116 Certificate III in Process Manufacturing

MSMENV272 Participate in environmentally sustainable work practices

MSMWHS300 Facilitate the implementation of WHS for a work group

- Assessment tools:
 - MSM30116 Cluster 1 Safety in the Workplace – Marking Guide V1.3 31/01/2020
 - MSM30116 Practical Assessment Marking Guide Cluster 1 V1.3 31/01/2020
 - MSM30116 Cluster 1 Cleaning, Hygiene and our Environment – Marking Guide V1.2 21/07/2020
 - Learner Assessments (39 knowledge questions, 12 practical tasks)
- Completed student assessment records for:
 - Student RA
 - Student CB
 - Student TB
 - Student AL
 - Student ZR
 - Student FS

FBP30117 Certificate III in Food Processing

FDFFS3001A Monitor the implementation of quality and food safety programs

- Assessment tools:
 - FBP30117 Cluster 3 Marking Guide V1.4 24/05/2019
 - Learner Assessments (38 knowledge questions, 7 practical tasks)
- Completed student assessment records for:
 - Student KA
 - Student PK
 - Student TK
 - Student DB
 - Student NH
 - Student SM

Interviews

- Quality Assurance Manager – Andrew Croft
- QLD Compliance Manager – Kevin Smalley

Evidence analysis

A provider must develop and implement a system to ensure:

- all assessment requirements of the relevant training package are met

Evidence analysis

- the Principles of Assessment and Rules of Evidence are applied in the assessment practices.

The Principles of Assessment require that no matter which assessment pathway or method a provider uses, the 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.

MSM30116 Certificate III in Process Manufacturing

MSMENV272 Participate in environmentally sustainable work practices

The provider has not evidenced compliance with the principles of validity and sufficiency under the Principles of Assessment and Rules of Evidence as the provider has not demonstrated that each student has been assessed against all assessment requirements outlined in the unit of competency. Specifically:

- Cluster 1 Safety in the Workplace is designed to assess six units of competency, one of which is *MSMENV272 Participate in environmentally sustainable work practices*. Performance criteria for this unit require students to read and follow environmental policies and procedures to ensure compliance with federal, state/territory and local government laws, by-laws, regulations and mandated codes of practice, and codes and standards that the organisation applies voluntarily. Additionally, assessment conditions stipulate the use of environmental regulations, guidelines and procedures. The knowledge question mapped to these requirements asks the student to identify relevant environmental state laws and to outline consequences for the company if the laws were not followed. This question does not capture evidence a student has the ability to read and follow said protocols, rather it asks them to identify them.
- When asked, the Quality Assurance Manager and QLD Compliance Manager agreed the mapped question did not cover these unit of competency requirements, however asked for the time to review the assessment cluster to see if it was covered in other questions or tasks.
- In response to this gap in assessment, the provider submitted a revised Cluster 1 Marking Guide that was developed 21/07/2020. The revised cluster has been developed to assess a different set of units of competency that are grouped under the title of cleaning, hygiene and our environment. A review of the new knowledge questions confirm this requirement is now met. It was confirmed this updated assessment cluster has not yet been implemented as there are more changes the provider intends to make as part of their ongoing continuous improvement.
- Therefore, the provider has evidenced compliance for future students. The identified non-compliance relates to demonstrated practice only.

MSMWHS300 Facilitate the implementation of WHS for a work group

The provider has not evidenced compliance with the principle of reliability under the Principles of Assessment as the provider has not demonstrated assessment tools contain sufficient performance benchmarks for each skill and/or behaviour to be observed; therefore it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors. Specifically:

- Cluster 1 Safety in the Workplace is designed to assess six units of competency, one of which is *MSMWHS300 Facilitate the implementation of WHS for a work group*. Practical task 6 requires students to consult with a work group and while doing so, demonstrate a range of skills/behaviour. Students are provided with a checklist of what needs to be demonstrated that is designed for the student to self-assess by ticking against each requirement. Assessor instructions stipulate the assessor must observe the student implementing the task and mark accordingly in the observation checklist. The observation checklist for the assessor's use does not align to the students' checklist and simply asks if the student consulted the workgroup for feedback and collaboration.
- This is of concern because the task is designed to capture demonstration of performance evidence within the assessment condition of the inclusion of a demonstration of communication of WHS information to a group and the use of appropriate consultation and participation from within that group. The student self-assessed checklist and the existing assessor observation checklist do not ensure reliability of the making of consistent judgements due to limited assessor observation and insufficient performance benchmarks.

Evidence analysis

- When raised with the provider, it was agreed the assessment tool needed to be amended in order to capture the evidence in a way that is consistent and reliable.

FBP30117 Certificate III in Food Processing

FDFFS3001A Monitor the implementation of quality and food safety programs

The provider has not evidenced compliance with the principles of validity and sufficiency under the Principles of Assessment and Rules of Evidence as the provider has not demonstrated that each student has been assessed against all assessment requirements outlined in the unit of competency.

The provider has not evidenced compliance with the principle of reliability under the Principles of Assessment as the provider has not demonstrated assessment tools contain sufficient performance benchmarks for each skill and/or behaviour to be observed; therefore it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of students and assessors.

Specifically:

- Cluster 3 is designed to assess three units of competency, one of which is *FDFFS3001A Monitor the implementation of quality and food safety programs*. Practical task 4 requires students to act in the role of a quality control officer by conducting weight checks in a simulated workplace, however the task has not been designed in a manner to reflect industry requirements. For example, the use of sanitary wipes is deemed an acceptable method to clean and sanitise equipment used for the task, whereas in a real workplace environment this method would be not be used.
- The marking guide does not include sufficient benchmarks to describe the expected standard performance, for example, with the type of footwear or other clothing, or specific equipment required for the task. Therefore, it cannot be confirmed consistent judgements will be made across a range of students and assessors, and that the following required skills would be addressed:
 - model safe food handling and quality practices and procedures to achieve required outcomes, including demonstrating:
 - cleaning and sanitising equipment
 - sampling and testing as appropriate according to quality and food safety requirements
 - maintaining personal hygiene
 - wearing appropriate clothing and footwear as required by the work task
 - handling, cleaning and storing equipment, utensils and packaging materials as appropriate
- When raised with the provider, it was agreed the assessment task needed to be amended in order to reflect realistic industry requirements and to ensure consistent and reliable assessment decisions are made that meet all training package requirements.

The provider has not evidence compliance with authenticity under the Rules of Evidence as the provider has not demonstrated that each assessor is assured evidence presented for assessment is the learner's own work. Specifically:

- The completed assessment records included a sample of five students from the same cohort and location (Gympie) that were assessed by the same assessor. Written responses to multiple short answer questions submitted by these students were identical in word selection and sentence structure, and did not come from the learner guide or match the sample response provided in the marking guide.
- This is of concern because it does not evidence the learner's application of knowledge with regard to the context of the question and suggests written responses were copied from a single source. When raised with the provider, both the Quality Assurance Manager and QLD Compliance Manager agreed the evidence raised concerns about the way the assessment was conducted by the single assessor.

Audit finding

Not compliant

The provider has not demonstrated students have been assessed against all units of competency requirements and that its assessment tools and practices are consistently implemented so as to ensure the Principles of Assessment and Rules of Evidence for validity, sufficiency, reliability and authenticity have been met.

Action required

Provide evidence that demonstrates:

- the provider 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 provider 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 provider has 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 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 provider in the past one month.

Trainer and assessor competency

Standards for RTOs - Standard 1

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

Clause 1.13

Audit 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:

- 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.

Key sources of evidence relevant to finding

FBP30117 Certificate III in Food Processing

- Current Industry Knowledge and Skills FBP30117 July to December 2019 Steven Nicholls
- Current Industry Skills FBP30117 Certificate III in Food Processing Jan to Jun 20 Steven Nicholls
- Copy of qualification FBP30117 Certificate III in Food Processing for Steven Nicholls dated 15/02/2019
- Copy of qualification FDF30110 Certificate III in Food Processing for Steven Nicholls dated 12/12/2014 (achieved through Australian Apprenticeship arrangements).

Interviews

- Quality Assurance Manager – Andrew Croft
- QLD Compliance Manager – Kevin Smalley

Evidence analysis

Providers must ensure the RTO's training and assessment is delivered only by persons who have vocational competencies at least to the level being delivered and assessed, and current industry skills directly relevant to the training and assessment being provided.

The provider has not provided sufficient evidence to demonstrate that training and assessment has been delivered by persons who have current industry skills directly relevant to the training and assessment being provided. Specifically:

- While Steven Nicholls has achieved the equivalent qualification to demonstrate vocational competency, evidence provided does not demonstrate he has current industry skills for food processing. The relevant qualification was achieved under apprenticeship arrangements in 2014, indicating he was working in the industry at the time, however no evidence was provided to support his work history since that date.
- Evidence provided to support industry currency includes the reading of newsletters, reviewing the content of books and setting up observation kits for students to use. The current industry knowledge and skills document does not describe how these activities relate to the linked units of competency within the qualification. Combined with the lack of evidence to support work history in the food processing industry, the provider has not provided sufficient evidence to support current industry skills directly relevant to training and assessment being provided.
- When raised with the provider, it was agreed the provided evidence was not sufficient to demonstrate Steven Nicholls' current industry skills.

Audit finding

Not compliant

The provider has not demonstrated the RTO's training and assessment is delivered only by persons who have current industry skills directly relevant to the training and assessment being provided.

Action required

Provide evidence that demonstrates:

- the provider now has appropriate processes to ensure it only uses trainers/assessors who meet the requirements of the standards to provide training and assessment (Clause 1.13)
- the trainers/assessors currently used by the provider meet the requirements of the standards (Clause 1.13)
- the provider has 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 trained or assessed by a trainer/assessor that did not meet the requirements of the standards. Remedial action needs to cover current students and students who enrolled or completed with your provider in the past one month.

Minor deficiencies

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

- The Student Fees and Refund Policy refers to an enrolment fee, however an enrolment fee is not applicable to funded students. The enrolment fee only applies to full fee paying students.