



REPORT

Audit report: Australian Child Care Career Options (ACCCO) Pty Ltd

RTO number: 5404
CRICOS number: 02483D
Date/s of audit: 18 February 2020
Date report created: 25 February 2020

Organisation details

Organisation's legal name: Australian Child Care Career Options (ACCCO) Pty Ltd
Trading name/s: Australian Child Care Career Options
RTO number: 5404
CRICOS number: 02483D

Audit team

Lead auditor: [REDACTED]
Auditor/s: N/A

Audit details

Application number/s: N/A
Audit number/s: AUDREC0010219
Audit reason/s: Compliance Monitoring
Address of site/s visited: 161 Brunswick Street
Fortitude Valley QLD 4006
Australia
Date/s of audit: 18 Feb 2020 - 18 Feb 2020
Organisation's contact for audit: [REDACTED]
CEO
[REDACTED]@accco.com.au
1300139406

Original finding at time of audit

Audit finding: Concerning non-compliance

Report completed by: [REDACTED]

| Practice | Standards for RTOs | National Code | 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 | 11.1, 11.2, 8.18, 8.19, 8.20 | Not compliant |
| Marketing/Recruitment Practices | 4.1 | 1.1, 1.2, 1.3, 1.4 | Compliant |
| Enrolment | 5.1, 5.2, 5.3, 7.3 | 2.2, 2.1, 3.1, 3.3*, 8.5, 3.4* | Not compliant |
| Support and Progression | 1.7 | 6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.9, 8.1, 8.3, 8.4, 8.9 | Compliant |
| Completion | 3.1* | | Not compliant |

Regulatory Compliance /
Governance

2.3, 2.4, 8.2*

4.1, 4.2*, 4.3*

Not compliant

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

- The organisation was initially registered as an RTO in January 1998 and as a CRICOS provider in May 2003.
- The organisation specialises in early childhood education and care programs.
- It is owned and operated by the CEO - [REDACTED]
- Reporting to the CEO are four management roles:
 - National Training Manager/Operations Manager – [REDACTED]
 - Compliance Coordinator – [REDACTED]
 - Curriculum / Business Development Manager – [REDACTED]
 - HR Advisor – [REDACTED]

Scope of organisation's registration:

- CHC22015 Certificate II in Community Services
- CHC30113 Certificate III in Early Childhood Education and Care
- CHC30213 Certificate III in Education Support
- CHC40113 Certificate IV in School Age Education and Care
- CHC40213 Certificate IV in Education Support
- CHC50113 Diploma of Early Childhood Education and Care
- CHC50213 Diploma of School Age Education and Care
- CHC62015 Advanced Diploma of Community Sector Management
- HLTAID001 Provide cardiopulmonary resuscitation.

Suburb and state of all delivery sites:

- Fortitude Valley, Queensland
- Ingleburn, New South Wales
- Smithfield, South Australia
- Perth, Western Australia.

Third party usage:

- 69 agreements with education agents for the recruitment of international students
- Two agreements with schools for the delivery of training and assessment (VET in schools program).

Core clients/target groups:

- Learners currently employed in the early childhood education and care industry
- Learners who wish to gain employment in the early childhood education and care industry
- International students.

Training Revenue (Funded or fee for service):

- The majority of training revenue comes from state funded programs (QLD, ACT, NSW, SA and WA)
- Fee for service international students.

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

- 2421

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 Child Care Career Options (ACCCO) Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Australian Child Care Career Options (ACCCO) Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Australian Child Care Career Options (ACCCO) Pty Ltd conducted on 18 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>CHC50113 Diploma of Early Childhood Education and Care</i> | Face to face, Workplace, Traineeship | 1148 |
| <i>HLTAID001 Provide cardiopulmonary resuscitation</i> | Face to face | 0 |

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

Interviewees

| Name | Position | Training products |
|------------|--|---------------------------------|
| [REDACTED] | CEO | - |
| [REDACTED] | National Training Manager/Operations Manager | <i>CHC50113 & HLTAID001</i> |
| [REDACTED] | Compliance Coordinator | - |
| [REDACTED] | HR Advisor | - |
| [REDACTED] | Curriculum/Business Development Manager | <i>CHC50113 & HLTAID001</i> |

About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting 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 Child Care Career Options (ACCCO) Pty Ltd did not meet the following requirements:

Standards for RTOs: 1.8, 3.1, 8.2

National Code: 3.3, 3.4, 4.2, 4.3

Remedial action is required for the following training products:

- *CHC50113 Diploma of Early Childhood Education and Care*
- *HLTAID001 Provide cardiopulmonary resuscitation*

The organisation is required to provide evidence that demonstrates:

Training and assessment

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 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 organisation in the past three months.

Enrolment

National Code Standards 3.3 and 3.4

- the provider now has entered into written agreements with all students that provides clear and accurate information regarding the services offered by the provider, the requirements for

maintaining satisfactory course progress, the fees payable and information on refunds, and that complies with National Code Standards 3.3 and 3.4.

Completion

Standards for RTOs 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 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 issued with AQF certification documentation and were not assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course. Remedial action needs to cover students issued with AQF certification in the past three months.

Regulatory compliance and governance

Standards for RTOs Clause 8.2 and National Code Standards 4.2 and 4.3

- the organisation now has a written agreement with each third party that provides services on its behalf that meets the requirements of the Standards for RTOs Clause 8.2 and the National Code Standards 4.2 and 4.3.

Areas of non-compliance

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 | <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 | <p>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.</p> |
| Sufficiency | <p>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.</p> |
| Authenticity | <p>The assessor is assured that the evidence presented for assessment is the learner's own work.</p> |

| | |
|----------|---|
| 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

HLTAID001 Provide cardiopulmonary resuscitation

- The following evidence was reviewed:
 - Assessment tools for:
 - CHCECE005 Provide care for babies and toddlers*
 - Mapping document
 - Session plan
 - PowerPoint presentations
 - Learner guide
 - Student assessment booklet including:
 - Assessment A – written questions
 - Assessment B – project
 - Assessment C – supervisor report
 - Assessment D – observation report
 - Trainer marking guide
 - Draft version of the assessment system for the unit (to reflect upcoming 2020 training package release)
 - CHCECE020 Establish and implement plans for developing cooperative behaviour*
 - PowerPoint presentations
 - Learner guide
 - Student assessment booklet including:
 - Assessment A – written questions
 - Assessment B – case study
 - Assessment C – supervisor report
 - Assessment D – observation report
 - Trainer marking guide
 - HLTAID001 Provide cardiopulmonary resuscitation*
 - Mapping document
 - Session plan
 - PowerPoint presentation
 - Learner guide
 - Student assessment booklet including
 - Assessment A – written questions (pre-learning)
 - Assessment B – CPR observation report
 - Assessment C – emergency scenario and incident report form
 - Trainer marking guide
 - Training and assessment strategy
 - Emergency scenarios list
 - Completed student assessment items (and the assessment tools used):
 - CHCECE005 Provide care for babies and toddlers*
 - Learners [REDACTED]
 - Assessment A – written questions
 - Assessment B – project
 - Assessment C – supervisor report
 - Assessment D – observation report
 - CHCECE020 Establish and implement plans for developing cooperative behaviour*
 - Learners [REDACTED]
 - Assessment A – written questions
 - Assessment B – case study
 - Assessment C – supervisor report
 - Assessment D – observation report

HLTAID001 Provide cardiopulmonary resuscitation

- Learners [REDACTED]
 - Assessment A – written questions (pre-learning)
 - Assessment B – CPR observation report
 - Assessment C – emergency scenario and incident report form
- 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.
- Validity and Sufficiency - the assessment tools do not address all unit of competency requirements. For example, but not limited to:
 - Performance Evidence:

CHCECE020 Establish and implement plans for developing cooperative behaviour

 - Assessment D – observation report does not require the assessor to confirm that the learner has '*observed and analysed children's behaviour on at least three occasions in a range of student contexts*'. The learner assessment work reviewed included various types of observation records that had been completed by the learners, however not all learner files contained three different observations and there were no instructions to the learner requiring them to conduct and analyse three observations.
 - The assessment tool for this unit do not demonstrate that the learner has '*created, implemented and measured the effectiveness of at least one plan*'.
 - Knowledge Evidence:

CHCECE020 Establish and implement plans for developing cooperative behaviour

 - '*different family styles of discipline*' was not covered in the assessment tools for this unit.
- Reliability - the assessment tools do not contain sufficient performance benchmarks for each skill and/or behaviour to be demonstrated; 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. For example, but not limited to:
 - *CHCECE005 Provide care for babies and toddlers*

The trainer marking guide for assessment A – written questions, lists four 'suggested' articles for the question about the UN Convention of the Rights of the Child. A review of learner assessment work showed that learners who listed only one article for this question were marked as satisfactory. In discussions held during the audit it was established that the learner was only required to provide one article for a satisfactory result, however, the organisation has not provided evidence to demonstrate that all assessors will make a consistent judgement on this question as this information is not detailed in the marking guide.
 - *HLTAID001 Provide cardiopulmonary resuscitation*

The observation checklist for the CPR demonstration is an exact list of the performance evidence from the unit of competency. The observation checklist in the trainer marking guide does not contain performance benchmarks that a learner is required to meet. For example, the item '*responded appropriately in the event of regurgitation and vomiting*' does not detail what tasks a learner must do to demonstrate they have met this requirement.

Enrolment

National Code Standard 3.3

Original Finding: Not compliant

In addition to all requirements in the ESOS Act, the written agreement must, in plain English:

- 3.3.1 outline the course or courses in which the student is to be enrolled, the expected course start date, the location(s) at which the course will be delivered, the offered modes of study for the course, including compulsory online and/or work-based training, placements, and/or other community-based learning and/or collaborative research training arrangements
- 3.3.2 outline any prerequisites necessary to enter the course or courses, including English language requirements
- 3.3.3 list any conditions imposed on the student's enrolment
- 3.3.4 list all tuition fees payable by the student for the course, the periods to which those tuition fees relate and payment options (including, if permitted under the ESOS Act, that the student may choose to pay more than 50 per cent of their tuition fees before their course commences)
- 3.3.5 provide details of any non-tuition fees the student may incur, including as a result of having their study outcomes reassessed, deferral of study, fees for late payment of tuition fees, or other circumstances in which additional fees may apply
- 3.3.6 set out the circumstances in which personal information about the student may be disclosed by the registered provider, the Commonwealth including the TPS, or state or territory agencies, in accordance with the Privacy Act 1988
- 3.3.7 outline the registered provider's internal and external complaints and appeals processes, in accordance with Standard 10 (Complaints and appeals)
- 3.3.8 state that the student is responsible for keeping a copy of the written agreement as supplied by the registered provider, and receipts of any payments of tuition fees or non-tuition fees
- 3.3.9 only use links to provide supplementary material.

- The following evidence was reviewed:
 - Letters or offer for learners [REDACTED]
- The organisation's written agreement omits the following information required by Standard 3.3 regarding the prospective student's enrolment:
 - Information on work placement arrangements for the *CHC50113 Diploma of Early Childhood Education and Care*.
 - The learner's obligation to keep copies of the written agreement and receipts of payment to the provider.
 - The learner's obligation to advise the provider of any changes to emergency contacts within 7 days of the change.

National Code Standard 3.4

Original Finding: Not compliant

The registered provider must include in the written agreement the following information, which is to be consistent with the requirements of the ESOS Act, in relation to refunds of tuition fees and non-tuition fees in the case of student default and provider default:

- 3.4.1 amounts that may or may not be repaid to the overseas student (including any tuition and non-tuition fees collected by education agents on behalf of the registered provider)
- 3.4.2 processes for claiming a refund
- 3.4.3 the specified person(s), other than the overseas student, who can receive a refund in respect of the overseas student identified in the written agreement, consistent with the ESOS Act
- 3.4.4 a plain English explanation of what happens in the event of a course not being delivered, including the role of the TPS
- 3.4.5 a statement that "This written agreement, and the right to make complaints and seek appeals of decisions and action under various processes, does not affect the rights of the student to take action under the Australian Consumer Law if the Australian Consumer Law applies".

- The following evidence was reviewed:
 - Letters or offer for learners [REDACTED]
- The organisation's written agreement omits the following information required by the ESOS Act regarding the prospective student's enrolment:
 - The statement "This agreement, and the availability of complaints and appeals processes, does not remove the right of the student to take action under Australia's consumer protection laws".

Completion

Standards for RTOs Clause 3.1

Original 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.

CHC50113 Diploma of Early Childhood Education and Care

HLTAID001 Provide cardiopulmonary resuscitation

- The following evidence was reviewed:
 - Assessment materials and judgement tools reviewed at 1.8
- 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.

Regulatory Compliance / Governance

Third Parties (including education agents)

Standards for RTOs Clause 8.2

Original Finding: Not compliant

The RTO ensures that any third party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:

- by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and**
- in the conduct of audits and the monitoring of its operations.**

- The following evidence was reviewed:
 - Third party agreements with:
 - BADA Global
 - Western Overseas Study
- Review of the organisation's written agreement for services delivered on its behalf found that it does not contain conditions which ensure that the third party meets all relevant obligations in the delivery of these services. For example, but not limited to:
 - The agreement does not require the third party to cooperate with the VET regulator in regards to providing accurate and factual responses to information requests or in the conduct of audits and the monitoring of its operations.

National Code Standard 4.2

Original Finding: Not compliant

The written agreement must outline:

- 4.2.1 The responsibilities of the registered provider, including that the registered provider is responsible at all times for compliance with the ESOS Act and National Code 2018
- 4.2.2 The registered provider's requirements of the agent in representing the registered provider as outlined in Standard 4.3
- 4.2.3 the registered provider's processes for monitoring the activities of the education agent in representing the provider, and ensuring the education agent is giving students accurate and up-to-date information on the registered provider's services
- 4.2.4 The corrective action that may be taken by the registered provider if the education agent does not comply with its obligations under the written agreement including providing for corrective action outlined in Standard 4.4
- 4.2.5 The registered provider's grounds for termination of the registered provider's written agreement with the education agent, including providing for termination in the circumstances outlined in Standard 4.5
- 4.2.6 The circumstances under which information about the education agent may be disclosed by the registered provider and the Commonwealth or state or territory agencies.

National Code Standard 4.3

Original Finding: Not compliant

A registered provider must require its education agent to:

- 4.3.1 declare in writing and take reasonable steps to avoid conflicts of interests with its duties as an education agent of the registered provider
- 4.3.2 observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students
- 4.3.3 act honestly and in good faith, and in the best interests of the student
- 4.3.4 have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

- The following evidence was reviewed:
 - Third party agreements with:
 - BADA Global
 - Western Overseas Study
- Review of the organisation's written agreement for services delivered on its behalf found that it does not outline its obligations as required by Standards 4.2. For example, but not limited to:
 - The written agreement does not outline that the registered provider is responsible at all times for compliance with the ESOS Act and National Code 2018.
- Review of the organisation's written agreement for services delivered on its behalf found that it does not outline the circumstances under which information about the education agent may be disclosed by the registered provider and the Commonwealth or state or territory agencies.
- The organisation has not demonstrated that it requires, under written agreement, its education agents to meet all their obligations under Standard 4.3. For example, but not limited to:
 - The written agreement does not require the education agent to declare in writing and take reasonable steps to avoid conflicts of interest.
 - The written agreement does not require the education agent to have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.