



# Assessment of evidence of compliance

## Provider details

Provider's legal name:	Training Management Pty Ltd
Business/Trading name/s:	Traxion Training
RTO code:	32254
CRICOS code:	N/A

## Compliance case details

Application number/s:	ADDVET0045272
Audit number:	AUDREC0012423
Compliance case reason/s:	Application - Change
Provider's contact details:	Ms Sylvia Tiong Chief Executive Officer <a href="mailto:sylvia.tiong@traxiontraining.edu.au">sylvia.tiong@traxiontraining.edu.au</a> 0403 243 819

## Assessment team

Compliance Management Officers	Kath Andrews Sarah Hall
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## Assessment summary

The below describes ASQA's assessment (in pale blue) of the provider's description of actions undertaken to return to compliance and supporting evidence submitted on 16 October 2024, 29 November 2024, 6, 10 and 11 December 2024 (in sky blue) in response to the findings of non-compliance against the:

- *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs)

It should be read in conjunction with the original Performance Assessment (audit) report dated 8 December 2023 which sets out the details of the original non-compliance.

## Assessment findings as at 16 December 2024

Practice	Legislation	Compliant	Not Compliant
<a href="#">Training and Assessment</a>	Standards for RTOs	1.1, 1.8	-
<a href="#">Enrolment</a>	Standards for RTOs	5.1	-

## Letter of Response to ASQA Audit Report from Provider

### Introduction

Subject: Response to ASQA Regarding Notice of Potential Cancellation of Registration

I am writing to formally respond to ASQA's decision to consider the cancellation of our registration, as outlined in the correspondence dated 19<sup>th</sup> September 2024. We would like to respectfully request that ASQA reconsider the decision to cancel our registration, and we would like to outline the steps we have taken to address the concerns raised in the decision. We have thoroughly reviewed the audit report and have addressed each of the concerns raised. Below are detailed responses to each point, outlining the actions taken and referencing the relevant documents from our updated processes and resources.

We acknowledge that the previous audit conducted in 2019 identified non-compliance with Clauses 1.1 and 1.8. However, we would like to clarify that the 2019 audit was based on training and assessment, not the Recognition of Prior Learning (RPL) pathway, which is our current focus. As such, the non-compliance identified in the 2019 audit is not directly repetitive. Since shifting our focus to an assessment-only model via RPL, we have developed new systems and processes tailored specifically to the unique requirements of RPL assessment.

This current audit marks our first comprehensive desk audit, and as a provider, we were not fully familiar with the desk audit process. We faced some challenges and misunderstandings due to the lack of opportunities to communicate directly with auditors, as would have been possible in a face-to-face setting. This limitation prevented us from asking clarifying questions that might have helped us avoid some of the confusion, particularly in the following areas:

- **Misunderstanding the Submission of Documents:** For example, we did not know that we needed to resubmit the RPL Application Form, as it had already been included in a prior submission. We believed the form had already been considered, based on previous communications.
- **Marketing Materials:** We were also unaware that we needed to include marketing materials in the submission, as marketing had already been deemed compliant in previous audits. This led us to believe that it was unnecessary to resubmit those materials.

- Interpretation of Findings: Some of the findings in the audit report were subject to interpretation. Without the opportunity to discuss them directly, we misunderstood certain expectations. For example, certain wordings in the audit report were interpreted differently by our team. In previous face-to-face audits, we were able to ask questions and clarify requirements on the spot, which helped us address concerns immediately. Additionally, we experienced delays in receiving clarification during the audit process. For instance, we submitted a clarifying question in mid-December 2023, but did not receive a resolution until March 2024, as no auditor had been assigned to address our query. This delay further contributed to our misunderstanding of some of the audit findings.
- We acknowledge that some information was not explicitly stated in the RPL Assessment Strategy (RAS) or the supporting documents initially submitted. However, this information was available in other documents, which have now been submitted for review. To avoid this issue in the future, we have undertaken a comprehensive review and updated the relevant information across multiple documents. This includes policies, procedures, checklists, forms, kits, instructions to assessors, students/prospective students, and employers. We have ensured that all these documents are consistent, aligned, and clearly articulate the necessary processes and requirements. By making these updates, we aim to ensure that our documentation is both comprehensive and uniform across all areas, avoiding any future discrepancies or misunderstandings.

Despite these challenges, we have since taken significant steps to address the identified gaps outlined throughout this document.

We respectfully request that ASQA take these factors into account, as this was our first comprehensive desk audit. We are still learning the new processes, and some of the misunderstandings could have been addressed more effectively in a face-to-face setting, where we could have sought immediate clarification.

Thank you for your time and consideration.

Sylvia Tiong

CEO of Traxion Training

## Non-compliances reviewed

### Clause 1.1 of the Standards for RTOs

#### Action required by performance assessment (audit) report

Provide evidence that demonstrates it:

- understands the causes of the issues.
- has rectified its RPL Assessment strategies and training and assessment strategies and/or practices for students to ensure they meet the requirements of the training products.
- has established and implemented appropriate systems and resources to ensure training and assessment strategies and/or practices for students meet the requirements of the training products.

## Actions taken by provider to return to compliance

Please refer to the Letter of Response document. All responses are documented under "Finding 1: Clause 1.1 of the Standards for RTOs."

### Finding 1. Clause 1.1 of the Standards for RTOs

#### 1. ASQA's Concern about RPL Assessment Strategies and Practices

The Provider was required to demonstrate that it has rectified its RPL assessment strategies and practices for students to ensure they enable each learner to meet the requirements of the training products. The Provider was also required to establish and implement systems and resources to ensure RPL assessment strategies and practices for students meet the requirements of the training package. Additionally, the Provider was also required to demonstrate it understood the causes of the issues. The Provider also submitted systems and procedures documentation including: Assessment Policy and Procedure, RPL Assessment Policy and Procedure, RPL Enrolment Administration Process, Sales (RPL) Evaluation Checklist, Audit Checklist Enrolment and Grading. The analysis of the evidence submitted found:  
The provider did not demonstrate that it has a consistent framework for the proposed assessment only pathway for Recognition of Prior Learning (RPL).

#### Our Response to Concerns Regarding RPL Assessment Strategies and Practices

Our updated **RPL Assessment Strategy (RAS)** has been thoroughly revised to align with the requirements of Clause 1.1, ensuring that our assessment strategies and practices are **consistent** with the requirements of the training packages and enable each learner to meet the requirements of each unit of competency.

The **RAS** includes the following key sections:

1. **Entry Requirements** (*Section 9*)
  - a. **Specific Course Entry Requirements** (*Section 9.1*): Detailed criteria that prospective students must meet, including:
    - i. **12 Months of Experience**: Requirement for at least 12 months of full-time equivalent work experience in a related industry, with acceptable evidence outlined.
    - ii. **Currently Employed**: Requirement for current employment in a relevant role throughout the RPL process.
    - iii. **Access to the Employer/Third Party**: Requirement for access to a third party who can verify the student's skills and knowledge.
    - iv. **Skills Align to the AQF Level**: Ensuring that the student's skills align with the Australian Qualifications Framework level of the qualification.
    - v. **Section A: Completion of the Self-Reflection Questionnaire** prior to enrolment, requiring prospective students to reflect

- on their existing skills and knowledge to determine whether they meet the competencies required for the qualification.
- b. **Training Package Entry Requirements:** Confirmation that there are no specific training package entry requirements as per TGA.
  - c. **Traxion's Additional Entry Requirements:** Additional requirements such as technology skills.
  - d. **Mandatory Placement Requirements:** Details on the workplace practicum required for certain units in a qualification, such as CHCCCS040 in CHC33021 and CHCCSM013 and CHCDEV005 in CHC52021.
  - e. **Assessment Conditions Checklist Requirement:** Requirement for students to submit the Assessment Conditions Checklist (ACC) to assess the suitability of their workplace environment, including the types of facilities, equipment, resources, and people they have access to, in order to be successful in the course.
  - f. **Certificate 3 Guarantee Program Funding Requirements:** Specific documentation required for students accessing funding.
  - g. **LLN Entry Requirements:** Detailed LLN requirements and assessment processes, including the LLN level needed for the course, tools for assessors to determine outcomes, and support strategies.
2. **Student Suitability Evaluation** (*Section 10*)
- a. **Preliminary Checks by the Sales Team:** Procedures for initial evaluation of prospective students, including communication of course requirements and use of the Sales (RPL) Suitability Evaluation Process and Sales (RPL) Suitability Evaluation Checklist.
  - b. **Verification by the Enrolment Team:** Steps for verifying documentation and eligibility before confirming enrolment, with detailed checks on supporting documents.
  - c. **Involvement of LLN Assessor and/or RPL Assessor Prior to Enrolment:** Criteria for assessor involvement to ensure student readiness, including scenarios that trigger assessor consultation prior to enrolment.
3. **List of Information and Documents to be Provided to Students Prior to Enrolment** (*Sections 7.5 and 11*)
- a. Comprehensive list of documents and resources provided to students, ensuring they are fully informed prior to enrolment. This includes the **RPL Assessment Kit Overview** including **Evidence Required against Units of Competencies, Course Webpage, Student Handbook, Section A Self-Reflection Questionnaire, Assessment Conditions Checklist (ACC), RPL Application Form**, and others. This information is to be included as marketing material and given to prospective students prior to enrolment. Please see **Course Webpage** document for details. All information that

is required to be given to student prior to enrolment is also reflected across the following documents including **Sales (RPL) Suitability Evaluation Checklist, Sales (RPL) Suitability Evaluation Process, RPL Enrolment Administration Process, RPL Audit Checklist - Enrolment and Grading for the course and RPL Application Form.**

4. **Language, Literacy, and Numeracy (LLN)** (*Section 12*)

- a. **Introduction to the LLN Process:** Detailed LLN assessment and support processes, including initial self-assessment, formal LLN assessments by qualified LLN assessors, support strategies, and limitations.

**Ensuring Consistency and Compliance**

Our RAS now provides a consistent framework for the RPL assessment-only pathway, ensuring that:

- **Alignment with Training Packages:** All assessments are designed to meet the specific requirements of the relevant training packages, with clear mapping of skills and experience to the units of competency. Please refer to **Assessment Validation Mapping** excel document for the course.
- **Qualified Assessors:** The roles of LLN and RPL assessors prior to enrolment are clearly defined. Assessors are involved where necessary to provide expertise and ensure consistent application of assessment strategies prior to enrolment.
- **Comprehensive Documentation:** Detailed policies, procedures, and checklists guide both staff and students through the RPL process, promoting consistency and transparency. Documents include:
  - **RAS** for the course (outlines entry requirements with updated Section A, ACC, LLN requirements, added sections such as “Student Suitability Evaluation”, “List of Information and Documents to be Provided to Students Prior to Enrolment”, “Language, Literacy, and Numeracy (LLN)” and “APPENDIX A: Facilities, equipment and resources requirements (which formulates Assessment Conditions Checklist Requirements)”.
  - **RPL Application Form** for the course (includes Assessment Conditions Checklist consistent with “APPENDIX A: Facilities, equipment and resources requirements (which formulates Assessment Conditions Checklist Requirements” in the RAS.))
  - **Section A – Self Reflection Questionnaire** for the course (updated for students to complete prior to enrolment. This is consistent with 7.2.3 Section A: Self Reflection Questionnaire in the RAS)
  - **RPL Assessment Kit Overview** and **Course Webpage** for the course (Updated to be provided to students prior to enrolment, includes **Evidence Against Units of Competency**, which outlines the specific evidence

- required in each section of the RPL Assessment Kit to demonstrate competency for each unit in the qualification. This is consistent with Section 7.5, Evidence Required Against Units of Competency, in the RAS.)
- **Sales (RPL) Suitability Evaluation Checklist** (updated with updated entry requirements such as Section A, ACC, LLN etc. This is consistent with “Entry Requirements”, “Student Suitability Evaluation”, “List of Information and Documents to be Provided to Students Prior to Enrolment” in the RAS.)
  - **RPL Policy and Procedure** (updated with entry requirements including Section A, ACC, LLN etc. This is consistent with “Entry Requirements” in the RAS.)
  - **RPL Enrolment Administration Process** (updated with updated entry requirements such as Section A, ACC, LLN etc. This is consistent with the “Entry Requirements”, “Student Suitability Evaluation”, “List of Information and Documents to be Provided to Students Prior to Enrolment”, “Language, Literacy, and Numeracy (LLN)” and “APPENDIX A: Facilities, equipment and resources requirements (which formulates Assessment Conditions Checklist Requirements)” in the RAS.)
  - **RPL Audit Checklist - Enrolment and Grading** for the course (updated with updated entry requirements such as Section A, ACC, LLN etc. This is consistent with 9. Entry Requirements in the RAS.)
  - **Prospective Student Application Case-by-Case Evaluation Process** (updated with when to involve assessors. This is consistent with **Section 10.1 Preliminary checks by the Sales Team** such as *“Throughout this process, if at any point the sales team feels clarifications are needed regarding LLN, Section A, ACC, job titles and responsibilities, or if the student has requested to speak with an assessor, the sales team will facilitate an appointment between the prospective student and an assessor. During this meeting, the assessor will discuss and clarify concerns with the prospective student and make a recommendation regarding the student’s suitability for the course they are applying for.”* And **10.2 Verification by the Enrolment Team** in the RAS)
  - **LLN Assessment Tools** for the course (Includes explanations of satisfactory requirements in the relevant course, benchmarks, and tools. This is consistent with sections 9.7 LLN Entry Requirements and 12. Language, Literacy, and Numeracy (LLN) in the RAS and LLN Policy and Procedures in the Student Handbook.)
  - **Student Handbook** (includes LLN Policy and Procedures consistent with **12. Language, Literacy, and Numeracy (LLN)** in the RAS.)



- **Quality Assurance Processes:** Regular reviews and audits of our RPL assessment practices are in place to maintain ongoing compliance with Clause 1.1. This includes the **RPL Audit Checklist - Enrolment and Grading**.

These documents provide detailed evidence of our updated processes and procedures, and we invite you to review them in relation to the specific headings and sections referenced.

## **2. ASQA's Concern about Inconsistency**

Inconsistent information was provided throughout the Strategy documents and other submitted documentation that did not support that the provider having a clear and robust RPL system in place that ensures students would only be enrolled in a course where they meet the pre-entry requirements and would be able to gather sufficient and valid evidence that meets the training package. The RPL Policy and Procedure (page 6) refers to a Formal RPL Application required to be completed once the preliminary evaluation is done by the sales team; however, a copy of the formal RPL application form was not provided, nor was this document referenced in the Strategy document.

### **Our Response in relation to inconsistency:**

We acknowledge the concerns raised regarding inconsistent information in our strategy documents and other submitted materials, particularly the absence of a clear and robust Recognition of Prior Learning (RPL) system and the omission of the Formal RPL Application Form in our submission on 11th June 2024.

We would like to clarify the reason why **the RPL Application Form** and other **LLN assessments** were not initially included in our submission on 11th June 2024. The omission occurred because the RPL Application Form, as well as LLN assessments, were submitted to ASQA on 13th November 2023 to Jane Wilson, following her request for sample students, including application forms, LLN tests, and correspondence between Traxion Training and those students. We also submitted information about sample students who were rejected due to not meeting entry requirements. On 8th December 2023, we were deemed compliant in our marketing and recruitment practices. We believe this information should have been considered when making the decision to cancel our registration.

We believe we have demonstrated clear practices in properly informing our students and rejecting applications based on students not meeting our entry requirements, confirming their unsuitability for the course. To date, we have received little to no complaints from students about being misinformed.

Given that the "Material Relied Upon" heading in the Statement of Reasons response stated that "Information about the provider held by ASQA has been considered," we assumed that ASQA had access to all information submitted in the change of scope application. However, for clarity and completeness, we have now attached the most recently **updated RPL Application Form** for each qualification within the audit scope for your review.



The RPL Application Form was included as part of our Course Webpage marketing resources and made available to prospective students prior to enrolment, as outlined in the material submitted to Jane Wilson on 12th October 2023. The audit report finalised on 8th December 2023 deemed our marketing and recruitment practices compliant, which led us to believe that we did not need to resubmit the RPL Application Form.

To summarise, we have taken the following steps to address ASQA's concerns:

1. We have established a clear and robust RPL system, and all relevant documents, including the **RPL Application Form**, have now been included.
2. Students are provided with sufficient and accurate information regarding the requirements of the training package, and they are only enrolled in courses when they meet the **entry requirements** outlined in the **RAS**.
3. The formal **RPL Application Form** is now consistently referenced and included in our **Strategy (RAS)** documents to support a transparent and thorough enrolment process.

#### **Establishing a Clear and Robust RPL System**

##### **Provision of the formal RPL Application Form:**

- We have included the **RPL Application Form** as a key document in our submissions. This form is now integral to our RPL process and is referenced throughout our Strategy documents.

##### **Updated RPL Policy and Procedure:**

- **Comprehensive RPL Framework:** We have updated our **RPL Policy and Procedure** document to provide a comprehensive framework that outlines each step of the RPL process, ensuring clarity and consistency.
- **Sections Detailing the RPL Process:**
  - **Heading: Procedure: Preliminary Suitability Evaluation: Evaluating student suitability and Entry Requirements** – Clearly outlines references to the RAS, Course Webpage, Sales (RPL) Suitability Evaluation Process and Sales (RPL) Suitability Evaluation Checklist documents.
  - **Heading: Procedure: RPL Application** – Describes the requirement for completing the formal **RPL Application Form** after the preliminary evaluation by the sales team.
  - **Heading: Procedure: RPL Assessment Process** – summarises the RPL Assessment Kit and references the to the RAS for the course, Sections within the RPL Assessment Kit for more details.

##### **Integration with Other Documents and Processes:**

- **Sales (RPL) Suitability Evaluation Process:**
  - i. **Section 2. EDUCATE, RECOMMENDATION OF RPL COURSE & VALUE PROPOSITION:** Provides a step-by-step guide for the sales team to adequately inform prospective students about the course.

ii. **Section 2c** specifically addresses the availability and provision of the **RPL Application Form**, stating, *“Provide Traxion Training’s website link, including access to the Student Handbook and RPL Application Form.”*

iii. **Section 5. ENROLMENT APPLICATION PRE-EVALUATION:** This section evaluates prospective students against the entry requirements, ensuring that only suitable candidates proceed to the application stage. The **RPL Application Form** is introduced only after all entry requirements have been confirmed under **Section 5s**.

- **RPL Enrolment Administration Process:**

- **Section 2.2.2 Enrolment Application Process Audit** outlines the enrolment team's responsibilities in verifying supporting documents, cross-checking information, and ensuring all entry requirements are met before enrolment. This information is consistent with the **Section 9. Entry Requirements and 10. Student Suitability Evaluation** in the **RAS**.

- **Prospective Student Application Case by Case Evaluation Process:** Establishes a procedure for handling exceptional cases, specifically designed to address situations where the evidence submitted by prospective students is not typical. This is also referenced in the **RAS** under **Sections 9.1 Specific course entry requirements and Involvement of LLN Assessor and/or RPL Assessor Prior to Enrolment**.

#### **Ensuring Students Meet Entry Requirements Before Enrolment Documentation**

##### **Enhanced Pre-Enrolment Evaluation Documents:**

- **Course Webpage and RPL Assessment Kit Overview:** Outlines the types of evidence acceptable prior to enrolment and for RPL assessments, including work samples, third-party reports, and observations etc.
- **Sales (RPL) Suitability Evaluation Checklist:** The sales team utilises this checklist to assess prospective students' suitability based on predefined criteria, including:
  - **Completion of the RPL Application Form:** Guides the prospective student through the application process. *“Instructions to sales team: Please ask the prospective student prior to completing a RPL Application Form all of the following questions and record the answer in the column next to the question. Note: The prospective student’s responses must align with the entry requirements and be relevant to the course they wish to apply for before the application is endorsed to the enrolment team. If the prospective student cannot confirm any of the following, please advise them not to continue with the application. Instructions to sales team: Please ask the prospective student, prior to completing a RPL*

*Application Form, all of the following questions and record the answer in the column next to the question."*

- **Completion of Section A:** Guides students to self-assess their competencies, ensuring they are aware of the evidence they need to gather for each unit of competency. *"Were Course Webpage and access to all pre-enrolment information such as course related information, Section A, Assessment Conditions Checklist, RPL Assessment Kit - Overview, Student Handbook and related terms and conditions provided to the prospective student regarding the recommended RPL course?"* and *"Has the enrolment process, RPL Assessment Kit - Overview (Section A - Section E as well as Evidence Required Against Units of Competencies), expected duration for completion, engagement and support provided discussed with the prospective student?"* and *"Has the prospective student completed Section A Self Reflection Questionnaire? Does it have any "never"s in their responses? If so inform prospective students that they would not be able to complete the qualification and that Traxion does not provide any gap training."*
- **Work Experience:** Minimum of 12 months full-time equivalent experience in the relevant industry within the past two years. *"Does the prospective student have sufficient experience working within the related sector i.e., at least 12 months of relevant work experience in the disability or community services industry within the past 2 years?"*
- **Current Employment:** Confirmation of current employment in a relevant role. *"Confirm the prospective student is currently employed in a related role and industry, e.g., in the community services industry."*
- **LLN Proficiency:** Self-assessment and, if necessary, formal LLN assessment to ensure students have the required language, literacy, and numeracy skills. *"Has the prospective student indicated any LLN issues in terms of proficiency of communicating in English in the workplace?"*
- **Access to Workplace Resources:** Verification that students have access to the necessary workplace facilities, equipment, and resources to demonstrate practical competencies. *"Has the prospective student been informed that they are required to access a list of facilities, equipment, and resources in accordance with the ACC?"*
- **Completed Work Placement Practicum:** *" Does the prospective student have the required work placement hours for this course? Check their performance activities to ensure it maps to the required performance criteria."*

*(This must be confirmed prior to enrolment. Please do not proceed with the application if the prospective student has not confirmed this.)" And "Confirm if the prospective student has multiple employers, that they understand that while only the current employer may need to confirm all skills and competencies, previous employers may also be involved if the current employer cannot verify all required competencies, especially when the current employer is not able to sign off on the required work placement hours."*

- **Assessor Involvement prior to enrolment:** The checklist includes questions such as, *"Is an assessor interview necessary to determine the prospective student's RPL suitability?"*
- **RAS:**
  - i. The **RPL Application Form** is now referenced in the **RAS** under the headings of **Course Assessment, Entry Requirements, Student Suitability Evaluation, and Language, Literacy, and Numeracy (LLN)**. E.g. *"Additionally, prospective students must agree to and sign a declaration confirming they have read, understood, and agree to all of the entry requirements listed under the Terms and Conditions of the RPL Application Form. Every prospective student must complete and submit this form prior to enrolment. Our enrolment team will review the completed RPL Application Form along with the supporting documents, including all entry requirement documents submitted by the student, and will assess them according to the relevant criteria."*
  - ii. **Sections referring to Assessor Involvement Prior to Enrolment:** In cases where suitability is uncertain, qualified assessors are involved before enrolment to evaluate the student's skills and knowledge, ensuring they can meet the unit requirements. This is referenced in the **RAS** under **Sections 10.1 Preliminary Checks by the Sales Team** *"The sales team conducts a preliminary assessment of all documents submitted by the student and endorses the application to the enrolment team if it meets the entry requirements. Throughout this process, if at any point the sales team feels clarifications are needed regarding LLN, Section A, ACC, job titles and responsibilities, or if the student has requested to speak with an assessor, the sales team will facilitate an appointment between the prospective student and the assessor. During this meeting, the assessor will discuss and clarify concerns with the student and make a recommendation regarding the student's suitability for the course they are applying for. For further details, please refer to the Prospective Student Application Case-by-*

*Case Evaluation Process.*” And **10.2 Verification by the Enrolment Team** “*Involve assessors where necessary, for example, if clarifications are needed or upon the student's request.*” And **12.1 Introduction to the LLN Process e.g. point 3 Assessor Involvement.**

- **Sales (RPL) Suitability Evaluation Process: Section 5, ENROLMENT APPLICATION PRE-EVALUATION, Handle Special Cases, Section 6. ASSESSOR INTERVIEW** also describes how the sales team informs the student of the entry requirements and collects the RPL Application Form along with supporting evidence during the pre-enrolment process.
- **Prospective Student Application Case by Case Evaluation Process:** Establishes a procedure for handling exceptional cases, specifically designed to address situations where the evidence submitted by prospective students is not typical and when to involve assessors prior to enrolment. This is also referenced in the **RAS** under **Sections 9.1 Specific course entry requirements.**
- **RPL Application Form:** Collects comprehensive information on the student's personal details, employment history, practical work experience, LLN proficiency, and access to resources. **“Instructions to Prospective students, Supporting Documents Attached?”:** Provides detailed instructions on the types of evidence required. **Assessment Conditions Checklist:** Included in the RPL Application Form, this checklist ensures that students have access to the required workplace resources and can gather evidence that aligns with the specific units of competency.
- **RPL Enrolment Administration Process and RPL Audit Checklist - Enrolment and Grading:** The enrolment team verifies all supporting documents, cross-checks information, and confirms that all entry requirements are met before proceeding with enrolment. Applications are rejected if they do not meet all entry requirements.

#### **Addressing Inconsistencies and Ensuring Clarity**

##### **Review and Alignment of Documents:**

- We have conducted a thorough review of all our RPL-related documents to eliminate inconsistencies and ensure that information is clear and aligned across all materials.
- **Consistent Terminology and Processes:** All documents now use consistent terminology, and processes are standardised to prevent confusion.

##### **Staff Training and Communication:**

- **Training Sessions:** We have provided training to our sales team, enrolment team, and assessors on the updated RPL processes and documentation.
- **Internal Communications:** Regular meetings and communications ensure that all staff are aware of their roles and responsibilities within the RPL framework.

### ASQA's Concern about Information Provided to Students

The provider has not submitted an assessment tool or information/guidance outlining what the student is required to submit as example of types of RPL portfolio evidence that align to the units of competency. The audit checklist refers to an RPL Plan; however, this was not provided for review.

#### **Our Response about information provided to students:**

We acknowledge ASQA's concerns regarding the absence of a clear assessment tool or guidance outlining what students are required to submit as examples of RPL portfolio evidence that aligns with the units of competency. To address these concerns comprehensively, we have taken the following actions:

1. We have included a section titled "**Evidence Required Against Units of Competency**" in the **RAS** document, which clearly outlines the specific evidence required for each unit of competency.
2. We have attached a copy of the **RPL Plan** for your review, which further details the process and evidence submission timelines for students seeking RPL. Now referenced within the **RPL Policy and Procedure, RPL Enrolment Administration Process, Sales (RPL) Suitability Evaluation Checklist, Sales (RPL) Suitability Evaluation Process, RPL Audit Checklist - Enrolment and Grading** and **RPL Assessment Strategy (RAS)**.
3. We have updated our other relevant documents to reflect these changes, ensuring alignment with the updates in the RAS.

Below, we outline the steps we have taken and provide references to specific sections and headings within our updated documents that, collectively, establish a clear and robust RPL system. This ensures that students are fully informed about the types of evidence they need to submit.

#### **Development and Submission of Comprehensive Assessment Tools and Guidance**

The following is a list and description of updated documents addressing the concern. Please refer to the relevant headings or titles within each document.

##### **RPL Assessment Strategy (RAS):**

- **Section 7.5 – Evidence Required Against Units of Competency:**
  - **Description:** This section provides detailed guidance on the types of evidence students must submit to demonstrate competency against each unit. It outlines acceptable forms of evidence, including work samples, third-party reports, direct observations, and competency conversations.



- **Reference:** This guidance is also included in our **RPL Assessment Kit Overview, Course Webpage** and referenced in the **RPL Application Form** as part of our marketing materials and information provided to students prior to enrolment, ensuring transparency and clarity.

#### **RPL Policy and Procedure:**

- **Section 6 – Formal RPL Application:**
  - **Description:** Details the requirement for students to complete a Formal RPL Application after preliminary evaluation by the sales team.
  - **Enhancement:** We have now included the formal **RPL Application Form** in our submissions and referenced it appropriately within the **RPL Assessment Strategy (RAS)** to ensure consistency across all documents.

#### **Comprehensive Guidance for Students on Gathering and Submitting Evidence**

#### **RPL Plan (Under RAS Section 7.4 – Assessment Period):**

- **Description:** Once a student is enrolled, Traxion assigns both an assessor and a Student Support Officer (SSO). Together, they engage with the student to finalise a personalised RPL Plan. This plan outlines deadlines and durations for submitting each section of the assessment, considering the student's work and family commitments.
- **Reference:** Included under **RAS Section 7.4 – Assessment Period**, ensuring structured and supported evidence gathering.

#### **RPL Audit Checklist - Enrolment and Grading (Program or Course Name):**

- **Reference to RPL Plan:**
  - **Description:** Ensures that assessors and the student support team utilise the RPL Plan as part of the RPL assessment process (under **RPL Grading**).
  - **Reference:** Aligns with **RAS Section 7.4 – Assessment Period** and ensures that all required evidence aligns with the units of competency as per the RPL Plan outlined in the **RAS**.

#### **Alignment of Evidence Requirements with Units of Competency RPL Assessment Strategy (RAS):**

- **Section 7 – Assessment Methods:**
  - **Description:** Outlines the various assessment methods used in RPL, including portfolio evidence, third-party reports, competency conversations, and observations.
  - **Section 7.5 – Evidence Required Against Units of Competencies:**
    - **Description:** Provides detailed guidance on the types of evidence required for each unit, ensuring students understand what is needed to demonstrate competency.

#### **Assessment Conditions Checklist (ACC) in RPL Application Form:**



- **Description:** Lists specific facilities, equipment and resources required for each competency, ensuring that students' evidence directly aligns with the units.
- **Reference:** Directly aligns with **RAS Section 9.5 – Assessment Conditions Checklist requirement** and **APPENDIX A: Facilities, equipment and resources requirements (which formulates Assessment Conditions Checklist Requirements)**.

#### **RPL Assessment Kit Overview Document:**

- List of information to be provided to students prior to enrolment:
  - **Description:** Lists all information provided to students before enrolment, including guidance on evidence requirements. For example, sections “Units under the Qualification”, “RPL Assessment Kit”, “RPL Assessment process”, “Instructions for Candidate/Student”, “Student RPL Evidence Checklist” and “Appendix A: Evidence against Units of Competency”.
  - **Reference:** Serves as part of our marketing material and ensures that prospective students are fully informed about the RPL process and what is expected of them.

#### **Ensuring Consistency and Clarity Across All Documents**

##### **Review and Alignment:**

- **RPL Policy and Procedure:** Updated to include references to the formal **RPL Application Form** and **RPL Plan**, ensuring consistency across all documents.
- **RPL Enrolment Administration Process:** Now includes steps to verify the completion and submission of the **RPL Application Form** and adherence to the **RPL Plan**.
- **Sales (RPL) Suitability Evaluation Process:** Ensures that sales representatives understand the requirements for endorsing students based on the **RPL Application Form**, including **Section A Self Reflection Questionnaire** and **Assessment Conditions Checklist (ACC)**. Ensures that sales representatives have provided and confirmed that the prospective student understands all entry requirements and the evidence required for each unit of competency. This includes providing the "RPL Assessment Kit Overview" document, which offers an overview of the enrolment process, course outline (Sections A–E, including Evidence Required Against Units of Competency), expected completion duration, and details on engagement and support provided to prospective students once enrolled. Reference: *“Provide an RPL Assessment Kit Overview document - overview of the enrolment process, course outline (Section A - Section E including Evidence Required Against Units of Competencies), expected duration for completion, engagement and support provided to prospective students once enrolled.”*
- **RPL Enrolment Administration Process:** Ensures that the **RPL Application Form** is completed, indicating that the prospective student has read the RPL Assessment Kit Overview, which includes the "Evidence Required Against Units of Competency"

under **2.2.2 Enrolment Application Process Audit**. The process also outlines how the Student Support Team and Assessors will collaborate with the student to develop the **RPL Plan under 2.4 Assigning an Assessor**. *“The assigned SSO will assist to prepare the individualised RPL Plan for the student. An enrolment confirmation and welcome email(s) will be sent to the student. SSO will make a welcome call to the student and make an appointment to walkthrough the RPL Plan with the assigned assessor. The appointment date and time should be made as early as possible based on the earliest available date and time available by both student and assessor (based on assessor’s MS calendar). The assigned assessor will also identify if any assessment adjustment is needed for the student and noted it in the individualised RPL Plan. A copy of this plan will be stored on the student portfolio on aXcelerate, so all relevant stakeholders will have the access to this plan while supporting the student.”*

**Staff Training and Communication:**

- **Training Sessions:** Conducted for the sales team, enrolment team, student support team and assessors to familiarise them with the updated RPL processes and documentation.
- **Internal Communications:** Regular updates and meetings to ensure all staff are aware of their roles and the standardised processes.

**ASQA's Concern about Enrolment Systems and Processes:**

Current enrolment systems and processes are inadequate. Sales (RPL) Suitability Evaluation Checklist and other processes in the student enrolments are finalised by the Sales (RPL) team. According to the RPL Kit Overview, assessors do not review the application form. An assessor is only assigned to the student after formal enrolment is completed. In the absence of a formal RPL application form, the RPL process does not ensure all potential students have the skills and knowledge required prior to enrolment.

**Our Response about enrolment systems and processes:**

We acknowledge ASQA's concerns regarding our current enrolment systems and processes, specifically related to the Sales (RPL) Suitability Evaluation Checklist, the delayed assignment of assessors, and the omission of the RPL Application Form. We kindly refer you to our previous responses for an explanation as to why the RPL Application Form was not included, to avoid unnecessary repetition here. Additionally, we have outlined the steps we have taken and provided references to specific sections and headings within our updated documents, which together establish robust and adequate enrolment systems and processes. To address the concern that the sales and enrolment teams may lack sufficient information to endorse an application or process an enrolment without the involvement of an assessor, we have implemented a clear structure to ensure that both teams are equipped with comprehensive tools and resources. These steps are thoroughly documented in our **RPL**

**Assessment Strategy (RAS), Sales (RPL) Suitability Evaluation Process, Sales (RPL) Suitability Evaluation Checklist, RPL Enrolment Administration Process and RPL Audit Checklist - Enrolment and Grading.** Below is an explanation of the steps we've taken to address this concern, along with references to the content from the RAS that provide evidence of the rigour in our system.

**Clear Evidence Criteria and Assessment Tools:**

We provide detailed evidence criteria and clear assessment tools to the sales and enrolment teams. These tools allow them to evaluate the sufficiency and accuracy of the evidence submitted by prospective students prior to enrolment. The teams are required to refer to the RAS, which outlines these criteria, and are provided with checklists to guide the evaluation process. This ensures that, in most cases, assessors only need to be involved when non-typical evidence is submitted or when clarification is needed. Additionally, if a student requests to speak with an assessor, arrangements can be made.

Each document—such as Section A: Self-Reflection Questionnaire, Assessment Conditions Checklist, and the LLN Assessment—includes specific assessment tool. These documents are provided to the sales team, enrolment team, and assessing team to ensure they have sufficient knowledge to evaluate the student's supporting evidence thoroughly and consistently prior to enrolment.

Here are some examples of what is included in the RAS, as referenced:

**1. Check for Completeness of the RPL Application Form:**

The enrolment team must ensure that the application form is fully completed, with all required fields filled out, including personal information, employment history, work experience, access to workplace facilities, equipment, resources, and educational qualifications. Missing information must be requested and confirmed before proceeding.

**2. Verification of Supporting Documents:**

The enrolment team is responsible for verifying all supporting documents to confirm the student's eligibility and suitability for the RPL program. This information is detailed in the **RAS** under **10.2 Verification by the Enrolment Team** (also shared with the sales team) and is consistent with references made in the **Sales (RPL) Suitability Evaluation Process** under the "**Notes**" section towards the end of the document. It is also included in the **RPL Enrolment Administration Process** under the heading **2.2.2 Enrolment Application Process Audit** and embedded within the Sales (RPL) Suitability Evaluation Checklist and RPL Audit Checklist - Enrolment and Grading. This verification includes:

- Proof of Photo Identity (driver's licence, 18+ card, passport, etc.).
- Proof of Residence in Queensland (for funding eligibility: driver's licence, utility bills, electoral roll registration, etc.).
- Proof of Australian Citizenship or Permanent Residency (Green Medicare card, Australia or New Zealand passport, if foreign

passport plus Australia permanent resident's visa, Australia birth certificate, etc.).

- Proof of Employment for a Minimum of 12 Months (employment letter, contract, recent pay slips, etc.).
- Proof of Current Employment in a Related Workplace (employment verification letter and position description, etc.).
- Proof of Position Description (current resume, official position description, or letter from employer).
- Proof of Work placement Practicum for the applicable unit/s e.g. 120 Hours of Experience Related to CHCCCS040 - Support Independence and Wellbeing (logbook, pay slips, or employer letter).
- Proof of Skills Across All Units of Competency (completed Self-Reflection Questionnaire from Section A).
- Completed LLN Assessment (if applicable) for students who are not proficient in English or numeracy.

### **3. Cross-Check Information:**

The enrolment team cross-checks the application form with the supporting documents to ensure consistency and accuracy. They may communicate with the student's employer if necessary to verify work experience and responsibilities.

### **4. Ensure Eligibility for Funding:**

For students seeking funding under programs like Certificate 3 Guarantee or Higher Level Skills, the enrolment team verifies that the student meets eligibility criteria, including residency and prior qualification checks.

### **5. Confirm LLN Standards:**

A prospective student applying for a course at Traxion Training completes the **LLN self-assessment** as part of the **RPL Application Form**. This self-assessment involves responding to a series of statements designed to align with the **Australian Core Skills Framework (ACSF)** levels required by the course. If the student agrees with all the statements, they are considered to meet the LLN requirements for the program. Additionally, students have the option to request a full **LLN Assessment** by indicating their preference on the RPL Application Form. For more details about the specific LLN requirements for each course, please refer to the **LLN Assessment Tools** provided for the course.

### **6. Involve Assessors Where Necessary, Prior to Enrolment:**

Assessors are involved when clarification is needed, or when the evidence provided is non-typical (such as informal workplace training or international qualifications). The assessor may also be involved if the student requests a consultation to discuss their application. We have also updated the **RPL Assessment Kit Overview** to include information on when to involve assessors prior to enrolment, ensuring our sales/enrolment teams are supported in their pre-enrolment assessment decisions. E.g. *“Assessors will be involved in this process if clarifications*

*are needed from the sales team and/or student, for example, if an LLN assessment is required, if the job title and responsibilities are atypical and the sales team finds it difficult to align them with the course, if Section A or ACC needs clarification, if the student's work duration requires analysis, or if the student initiates a request to discuss any concerns with the assessor."*

### **7. Final Eligibility Check:**

The enrolment team conducts a final check to confirm the student meets all entry requirements before enrolment approval. The criteria for assessing the RPL Application Form and supporting documents are detailed in the **RPL Enrolment Administration Process**.

### **8. Special Involvement of LLN and RPL Assessors:**

**Low LLN Proficiency:** If indicated on the application, the LLN Assessor will conduct a full assessment to ensure the student can meet the program's requirements.

**Close to Minimum Experience:** If the prospective student has near the required experience (e.g., 11 months instead of 12), the RPL Assessor will review to determine if skills and knowledge can satisfy qualification requirements.

**Transferability of Experience:** If experience is outside the current industry or gained overseas, the RPL Assessor evaluates whether the skills are transferable to the Australian context.

**Student or Sales/Enrolment Team Requests Assessor Consultation:** If the student or the sales/enrolment team has concerns about non-typical evidence, assessors are consulted to confirm suitability.

For more information and detailed processes, please refer to:

- RPL Assessment Strategy for the course
- Sales (RPL) Suitability Evaluation Checklist
- Sales (RPL) Suitability Evaluation Process
- RPL Enrolment Administration Process
- RPL Audit Checklist - Enrolment and Grading
- RPL Application Form for the course (includes Assessments Conditions Checklist)
- RPL Policy and Procedure
- Prospective Student Application Case by Case Evaluation Process (RPL Guide)
- Student Handbook (LLN Policy and Procedure)
- LLN Assessment Tools for the course
- Section A Self-Reflection Questionnaire for the course

### **9. Feedback Loop:**

The feedback loop from assessors plays a crucial role in maintaining the quality of the RPL program. Assessors provide feedback to the sales and enrolment teams on a monthly basis through team meetings (normally conducted on the first Monday of every month), focusing on the quality of students who have been enrolled in the RPL program. For example, if

assessors discover during the assessment process via the RPL Assessment Kit that a student may not be suitable for the program, they are required to communicate this immediately to the Sales Manager and Admin Manager, who oversee the enrolment teams.

If gaps are identified post-enrolment—such as a student not submitting all required documents in the RPL Assessment Kit for the units they are seeking RPL for—this feedback is documented during team meetings. As a result of this feedback, processes and checklists are updated to improve future enrolments, helping to capture and reject unsuitable applications earlier in the process. Additionally, improvements are made to the information provided to students so they fully understand the requirements and commitment from the beginning, reducing potential issues for both students and stakeholders.

For more details, please refer to the **RPL Policy and Procedure** under the heading of **Feedback Loop from Assessors**.

ASQA's Concern about Workplace Practicum:

The Provider has not established and implemented systems to ensure its RPL assessment strategies and practices meet the requirements of the training package. All 3 training products require assessment of practical skills in the workplace but the Provider's systems do not demonstrate that the Provider verifies that RPL candidates have access to a suitable work placement. The RAS refers to students requiring evidence of having worked 120 hours in a workplace prior to enrolment; however, this requirement was not included in the Sales team checklist or other enrolment documents.

**Our Response about workplace practicum:**

We acknowledge and understand ASQA's concerns regarding the inadequacies in our current systems, particularly the omission of the 120-hour work placement experience requirement from our Sales team checklist and enrolment documents.

The reason the workplace requirements were not initially included is because they are part of the **RPL Application Form**:

- *“Have you completed 120 hours of practical work experience in a direct support role as part of home and community disability support or community service organisations in the following areas (related to unit: CHCCCS040 - Support Independence and Wellbeing)?*
  - *Recognise and Support Individual Differences: Respect the social, cultural, and spiritual differences of each person, and support them in expressing their identity and preferences. Consider their individual needs, stage of life, and strengths, while promoting activities that reflect their personal values.*
  - *Promote Independence: Encourage individuals to recognise their strengths and support their self-care. Assist them in identifying opportunities to use these*



- strengths and provide access to resources and services that help them maintain and build independence.*
- *Support Physical Wellbeing: Promote healthy daily living habits, ensure a safe environment, and recognise any changes in the person’s physical condition. Report any hazards, health concerns, or situations beyond your scope according to organisational procedures.*
  - *Support Social, Emotional, and Psychological Wellbeing: Use positive communication to promote self-esteem, maintain predictable routines for security, and encourage participation in social, cultural, and spiritual activities. Recognise wellbeing variations, report indicators of abuse or neglect, and seek support for areas outside your expertise.” and*
  - *“Proof of 120 hours of experience related to CHCCCS040 - Support Independence and Wellbeing in the disability or community services industry: This may include documentation such as a logbook, pay slips with a corresponding position description, or a letter from your employer verifying your work responsibilities and hours. For more information, please refer to the unit requirements at training.gov.au - CHCCCS040 - Support Independence and Wellbeing.”*

The original **Sales (RPL) Suitability Evaluation Checklist** guides the prospective student to complete the **RPL Application Form** and requires the Sales Representative to confirm:

*"Does the prospective student have sufficient experience working within the related sector i.e. At least 12 months of relevant work experience in the disability or community services industry within the past 2 years?"*

The same process has been applied to all work placement requirements across other qualifications, such as the 200 hours specified in CHC52021. Additionally, the workplace practicum requirements were included on the **Course Webpage**, which is part of our marketing/pre-enrolment information, thereby ensuring students are well informed.

The following question was originally included in the **Sales (RPL) Suitability Evaluation Checklist**:

*"Were Course Webpage and access to all pre-enrolment information such as course related information, Section A, Assessment Conditions Checklist, RPL Assessment Kit - Overview, Student Handbook and related terms and conditions provided to the prospective student regarding the recommended RPL course?"*

We have already provided reasons why the **RPL Application Form** and marketing materials were not resubmitted in our 11 June 2024 submission. To avoid repetition, please refer to our previous responses, as we will not repeat them here.



## Establishing and Implementing Comprehensive Systems Aligned with Training Package Requirements

### Sales (RPL) Suitability Evaluation Process:

- **Verification of 120-Hour Workplace Experience:**
  - **Description:** *"5c. Confirm if the prospective student has already acquired the required work placement hours according to program requirements." And "Notes: To fully understand the evidence and criteria for acceptable entry requirement evidence, please refer to the RPL Assessment Strategy (RAS) document for the course. Pay particular attention to the following areas:*
    - *Course Assessment*
    - *Entry Requirements*
    - *Student Suitability Evaluation*
    - *List of Information and Documents to be Provided to Students Prior to Enrolment*
    - *Language, Literacy, and Numeracy (LLN)"*
  - **Reference:** This newly added criterion ensures that the mandatory work experience requirement is explicitly verified during the suitability evaluation process.
- **Step 5 – Enrolment Application Pre-Evaluation:**
  - **Description:** Sales representatives are now required to verify that prospective students have completed the mandatory workplace experience. This involves reviewing supporting documents such as work logs, employer letters, and position descriptions.
- **Step 8 – Enrolment Application:**
  - **Description:** Directs sales representatives to include the formal RPL Application Form, ensuring that all necessary information regarding workplace experience is captured and verified before enrolment.

### Sales (RPL) Suitability Evaluation Checklist:

- **Additional Sentences Added:**
  - **Access to Workplace Resources:** Verification that students have access to the necessary workplace facilities, equipment, and resources to demonstrate practical competencies. *"Has the prospective student been informed that they are required to access a list of facilities, equipment, and resources in accordance with the ACC?"*
  - **Completed Work placement Practicum:** *"Does the prospective student have the required work placement hours for this course? Check their performance activities to ensure it maps to the required performance criteria." And "Confirm if the prospective student has multiple employers, that they understand that while only the current employer may need to confirm all skills and competencies, previous employers may also be involved if the current employer cannot verify all required*

*competencies, especially when the current employer is not able to sign off on the required work placement hours."*

#### **RPL Assessment Strategy (RAS):**

- **Section 9 – Entry Requirements:**
  - **Description:** This section outlines the mandatory entry requirements for RPL prospective students, including for example, the necessity of having completed a minimum of 120 hours (CHC33021) or 200 hours (CHC52021) of practical work experience in a relevant workplace setting for specific units of competencies.
  - **Reference:** Ensures alignment with training package requirements by specifying the evidence needed to demonstrate practical skills.
- **Section 9.5 – Assessment Conditions Checklist and Appendix A Facilities, equipment and resources requirements (which formulates Assessment Conditions Checklist Requirements):**
  - **Description:** Details the resources, facilities, and equipment required for students to effectively demonstrate practical competencies.
  - **Reference:** Aligns with the training package by ensuring that students have access to appropriate workplace environments necessary for competency assessment.

#### **RPL Audit Checklist - Enrolment and Grading:**

- **Checklist References:**
  - *Currently Employed in a Relevant Sector e.g. disability or community services depending on the course they are applying - refer to the RAS.*

*Confirm the prospective student is currently employed in a role related to the relevant sector.*

*(As per entry requirements, it is essential for the prospective student to be currently employed in a relevant role; if not, do not proceed with enrolment and advise the prospective student. please refer the the Job Title Guide and the RAS for details)*

*Details Required:*

*Current position and responsibilities description from the workplace.  
(Satisfactory if provided; must align with the correct AQF Level responsibilities; if missing or not aligned, advise the prospective student accordingly.)*

*Supporting Documents Examples:*

*Employment Contracts*

*(Must specify role, responsibilities, and duration and be current; if missing or insufficient, advise the prospective student.)*

*Payslips*

*(Recent (within 30 days) and past payslips verifying ongoing employment; if missing, advise the prospective student.)*

*Employer Reference Letters*

*(On company letterhead, outlining role, duties, stating that the person is currently employed and length of employment; must be signed; if missing, advise the prospective student.)*

#### *Resume*

*(indicates that they are currently employed in the relevant role. Cannot be standalone proof; must be accompanied by other documents; if only a resume is provided, advise the prospective student to submit additional evidence.)*

*Practicum Work placement Hours Verification (where applicable - not all courses require specific amount of work placement hours)*

- *Completion of X Hours of Practicum Work placement required by the course/training package (refer to the RAS for the course) (Satisfactory if documentation demonstrates completion of tasks over x no. of hours aligned with specified unit requirements; if missing, incomplete, or insufficient, do not proceed with enrolment and advise the prospective student of the need to provide adequate proof. These may include logs, letters, or performance reviews from your workplace.*
- *Proof of employment details (Verify the student's number of years in the industry. e.g. 12 months full time.*

*Ensure the student meets the work experience requirements in terms of work responsibilities for the specific course and consistent with the information provided on the RPL application form*

- *Confirmed access to all mandatory facilities, equipment, and resources (as per the Assessment Conditions Checklist for the program). If a student declares that they do not meet certain ACC requirements, please contact the student to inform them of the possible outcomes, such as not meeting specific unit requirements.*
- *Verification of 12 Months Full-Time Equivalent Work Experience*

*(Satisfactory if documents collectively verify at least 12 months of relevant experience within the past 2 years; if insufficient, discuss alternative evidence or case-by-case evaluation as per entry requirements; if unable to demonstrate required experience, do not proceed with enrolment and advise the prospective student.)*

### **Enhancing the RPL Enrolment Administration Process to Verify Suitable Work Placements**

#### **RPL Enrolment Administration Process:**

- **Section 2.2.1 – Pre-enrolment Sales Stage Summary:**
  - **Description:** Summarises the initial evaluation steps taken by the sales team using the updated **Sales (RPL) Suitability Evaluation Checklist**, ensuring that all pre-entry requirements, including the 120-hour workplace experience, are verified.
- **Section 2.2.2 – Enrolment Application Process Audit:**

- **Description:** Outlines the enrolment team's responsibilities in verifying supporting documents related to workplace experience. This includes cross-checking the 120-hour requirement against submitted evidence to ensure compliance with training package standards.
- **Verification of Supporting Documents:**
  - **Description:** The enrolment team reviews all submitted documents to confirm that candidates have access to suitable work placements and have fulfilled the mandatory work experience hours.

**Training Staff and Ensuring Adequate Information Collection**  
**Staff Training and Information Collection:**

- **Comprehensive Training Sessions:**
  - **Description:** We have conducted extensive training sessions for all staff involved in the RPL process, including the sales team, enrolment team, and assessors. These sessions cover the updated RPL processes, the importance of verifying the workplace practicum requirement, and the use of the updated **Sales (RPL) Suitability Evaluation Checklist**.
- **Information Collection via RPL Application Form:**
  - **Description:** The **RPL Application Form** includes specific sections to capture detailed information about the student's workplace experience, ensuring that the 120-hour or 200-hour requirement is clearly documented and verified.
- **Criteria for Staff:**
  - **Description:** We have established clear criteria for staff to assess the sufficiency and relevance of the evidence submitted by students. These criteria ensure consistency and objectivity in evaluating the workplace experience against the course.

**ASQA's Concern Regarding Verification of Third Party/Workplace Supervisor Evidence and Confirmation of Practical Skills:**

The assessment strategies and practices do not ensure that assessors verify the third party/workplace supervisor evidence and confirm that the candidate has demonstrated the practical skills required by the training package. The Provider's documented assessment practice is for the assessor to confirm workplace evidence 'where possible.'

**Our Response Regarding Verification of Third Party/Workplace Supervisor Evidence and Confirmation of Practical Skills**

We acknowledge and understand ASQA's concerns regarding our assessment strategies and practices, specifically related to the verification of third-party/workplace supervisor evidence and the confirmation that candidates have demonstrated the practical skills required by the training package.

To address these concerns, we have implemented the following actions:

1. **Assessors Verifying Practical Skills:** We have added clear explanations in Section D, Part 2, detailing that assessors are required to verify the practical skills of students with third-party/workplace supervisors. This section records the verification responses to ensure the process is documented thoroughly.
2. **Mandatory Verification:** We have removed any references to "where possible," ensuring that verification with third-party/workplace supervisors is a mandatory task. This change ensures that the practical skills verification is consistently applied across all assessments.

### **Comprehensive Verification Through Section D Parts 1 and 2 Section D Part 1 – Third-Party Report:**

- **Log of Hours Table Completion:**
  - **Requirement:** Employers are required to complete a **Log of Hours Table** for each student/employee. The **table** is specifically designed to collect evidence from the employer about the responsibilities performed by the student (or their employee) for units that require practicum or workplace placement hours. This evidence is crucial for units like **CHCCCS040** in the **CHC33021 Certificate III in Individual Support** and **CHCCSM013** and **CHCDEV005** in the **CHC52021 Diploma of Community Services**. The log verifies the student's practical experience by recording details such as tasks performed, duration (in hours, including specific dates or date ranges), and relevant workplace responsibilities, ensuring that they have met the practical requirements of these units.
- **Employer Signature:** The completed Log of Hours Table must be signed by the employer, ensuring authenticity and accountability.
- **Purpose:** This documentation ensures that all requirements of the workplace practicum are met, providing a clear record of the student's practical experience for the specified number of hours.

### **Section D Part 2 – Employer Competency Conversation:**

- **Assessor's Interview with Employer:**
  - **Verification Process:** In Section D, Part 2, assessors are instructed to conduct a competency conversation with the employer. During this interview, the assessor verifies the third-party evidence/report and confirms that the student/employee has demonstrated the practical skills required by the training package for all units of competencies including the completion of mandatory work placement hours for applicable units.
  - **Key Verification Points:**

**In Section D, Part 2: Employer Competency Conversations**, the assessor must verify through an interview that the employer was the one who completed the log of hours table, which outlines the dates, work responsibilities, and includes their signature regarding the student/their employee. The following content was added for **CHC33021** as an example, and similar content has been added for other qualifications:

- Assessing Section D Part 2 against Section D Part 1 (Third-Party Report) *“Completion of Third-Party Report: Ensure that the employer confirms they are the individual who completed the third-party report. Verification of Workplace Hours and Responsibilities: Confirm that the employer has verified the total number of workplace hours completed by the student and that the student undertook the workplace responsibilities as outlined.”*
- *“Can you confirm that you are the individual who completed the Section D Part 1 third-party report for the student and that the student has performed all of the practical requirements outlined in the report? Could you also confirm that the student had access to all the items listed in the Assessment Conditions Checklist? Finally, can you confirm the location(s) and dates on which you completed the report?”*
- *“Can you please verify the total number of workplace hours (e.g., 120 hours) the student has completed in the log of hours table? Did you observe these responsibilities?”*
- **Purpose:** This step ensures that the information provided by the employer is accurate and that the student has genuinely fulfilled the required practical hours and responsibilities.

#### **Enhanced Training for Assessors**

##### **Assessor Training Programs:**

- **Comprehensive Training Sessions:**
  - Assessors undergo extensive training focused on effectively conducting employer competency conversations.
  - Training includes understanding how to verify the Log of Hours Table, asking targeted questions, and accurately documenting employer feedback.
- **Quality Assurance Measures:**
  - Regular audits (monthly) and reviews of assessor interviews ensure adherence to the established verification protocols.
  - Feedback mechanisms are in place to continuously improve the assessment process based on audit findings and assessor experiences.

ASQA's Concern Regarding the Integration of LLN Assessment in Training and Assessment Strategy and Enrolment Requirements



The policy documents refer to LLN assessment; however, this is not reflected in the training and assessment strategy nor the levels of LLN required for enrolment.

### **Our Response Regarding the Integration of LLN Assessment in Training and Assessment Strategy and Enrolment Requirements**

We acknowledge and understand ASQA's concern regarding the insufficient integration of Language, Literacy, and Numeracy (LLN) assessments within our Strategy and enrolment requirements, despite their mention in our policy documents.

To address this concern, we have taken the following actions:

1. Added "Language, Literacy, and Numeracy (LLN)" to our **RPL Assessment Strategy (RAS)**, ensuring it is now explicitly included.
2. Added LLN requirements for the course under **Entry Requirements** in the **RAS**.
3. Provided the **LLN Assessment Tools** for the course, which include explanations of satisfactory requirements, relevant course benchmarks, and tools. This aligns with **sections 9.7 (LLN Entry Requirements)** and **12 (Language, Literacy, and Numeracy (LLN))** in the **RAS**, as well as with the **LLN Policy and Procedures** in the **Student Handbook**.
4. Updated the **Student Handbook**, which now includes **LLN Policy and Procedures**, consistent with **section 12 (Language, Literacy, and Numeracy (LLN))** in the **RAS**.
5. Added more information in the **RPL Application Form** on how students can self-assess their LLN skills and understand the LLN requirements for the course. This ensures that students have guidance to determine their suitability for the course before enrolment.
6. Updated **the Sales (RPL) Suitability Evaluation Process** to include specific requirements regarding LLN assessment and verification.
7. Updated the **RPL Enrolment Administration Process** to include a step to Verify LLN Requirements as part of the enrolment process.
8. Updated the **Sales (RPL) Suitability Evaluation Checklist** and **RPL Audit Checklist - Enrolment and Grading** to reference the checking and verifying of LLN requirements for the course. These updates ensure that the LLN requirements are met, and access to formal LLN assessments is available when necessary or upon the request of the student.

### **Integration of Level Requirements in Documentation**

**RPL Assessment Strategy (RAS):** has been revised to ensure that all entry requirements, particularly those pertaining to LLN levels, are comprehensively addressed. The following sections highlight how LLN level requirements are embedded within the **RAS**:

#### **a. Section 9.7 – LLN Requirements for Enrolment**

- **Description:**

- This section explicitly outlines the LLN requirements necessary for enrolment into each course. It specifies the minimum LLN levels required, referencing the Australian



Core Skills Framework (ACSF) levels appropriate for each qualification.

#### **b. Section 12 – LLN Assessment Process**

- **Description:**
  - This section details the specific LLN assessment methodologies utilised to evaluate students' language, literacy, and numeracy skills.

#### **c. Section 12 and 13.4– LLN Support Services**

- **Description:**
  - Outlines the support mechanisms available for students requiring additional assistance with their LLN skills. For more information please also refer to the **LLN Assessment Tools** for the course and the **Student Handbook**.

**RPL Application Form:** ensures that both LLN and competency level requirements are thoroughly evaluated before enrolment. The following components illustrate how LLN level requirements are integrated into the RPL Application Form:

##### **a. LLN Assessment Section**

- **Description:**
  - A dedicated section within the RPL Application Form that captures detailed LLN information from prospective students.
- **Key Features:**
  - **Self-Assessment Questions:** Prospective students are prompted to self-assess their LLN skills, aligning with the ACSF levels required for their chosen course.

**RPL Enrolment Administration Process:** LLN requirements are documented in the process and consistent with the RAS:

- **“Completed LLN Assessment:**
  - i. *Requirement: Applies to prospective students who have indicated that they would like to access a LLN assessment on the RPL application form. If the result is satisfactory then please move forward with the application. Please reject the application if the LLN is not satisfactory.*
- *Risk-Based Approach: Traxion applies a risk-based approach to LLN assessments, ensuring that students who are unsure about their LLN levels and have requested an LLN assessment are formally assessed.”*

**Sales (RPL) Suitability Evaluation Process:** LLN requirements and confirmation are documented in the sales process consistent with the RAS:

- *“Confirm LLN Requirements: Prospective students are asked to complete the Language, Literacy, and Numeracy (LLN) Self-Assessment Questionnaire on the RPL Application Form. If the*

*student has requested to undertake a full LLN assessment, the sales team will arrange for a formal LLN assessment.”*

**Student Handbook:** provided to prospective students prior to enrolment.

- Content under headings **Language, Literacy and Numeracy (LLN)** and **LLN Policy and Procedures** are consistent with RAS.
- *“Not all students enrolled in an RPL pathway need to complete an LLN assessment prior to enrolment because all of our students have been working in the workplace and/or are currently working in the workplace and are expected to have a certain level of LLN skills. However, an LLN assessment will be provided to students who have advised us through the application form that they need help e.g. would like to access a formal LLN Assessment or if the SSO and/or assessor feels LLN support is needed during the student journey. We strongly advise informing the team of any considerations regarding your language, literacy, and numeracy abilities.”*

**The LLN Assessment Tool** for the course is provided to adequately assess the student’s LLN levels against the course requirements when necessary.

**Sales (RPL) Suitability Evaluation Checklist:** the following content has been included in the checklist:

- *Has the prospective student indicated any LLN issues in terms of proficiency of communicating in English in the workplace or have requested a formal LLN assessment? Refer the LLN requirements for the course in the RAS or Webpage.*

**RPL Audit Checklist - Enrolment and Grading:** the following content has been included in the checklist:

- *Language, Literacy, and Numeracy (LLN) Details*

*(If the prospective student indicates and declares they meet the LLN requirements at the required ACSF levels, no further LLN assessment is required. Proceed with enrolment.)*

*Prospective student self-assesses as not meeting the LLN requirements:*

*(If the prospective student indicates they do not meet the LLN requirements please reject the application. )*

*Prospective student requests formal LLN assessment:*

*(Arrange for a formal LLN assessment to be conducted by a qualified LLN assessor. Do not proceed with enrolment until results are evaluated.) .*

### **Enhanced Training and Quality Assurance**

To further reinforce the integration of level requirements, we have instituted enhanced training and quality assurance measures:

- **Staff Training Programs:**
  - **LLN and Competency Training:** Comprehensive training sessions for all LLN assessors and enrolment staff on the

importance of LLN and competency levels, and how to effectively support students.

- **Quality Assurance Audits:**

- **Regular Audits:** Conduct regular weekly audits by the Admin Manager, who oversees the enrolment teams, to ensure that level requirements are consistently applied in both the RAS and RPL Application Form processes. The findings from these audits are to be reported in the weekly leadership meetings to ensure accountability and collaboration across different departments.
- **Feedback Mechanisms:** Implement feedback mechanisms for continuous improvement based on audit findings and staff input.

- **Consistent Documentation:** All relevant documents, including the RAS, RPL Policy and Procedure, RPL Enrolment Administration Process, Sales (RPL) Suitability Evaluation Process and RPL Application Forms, clearly reflect LLN assessment requirements and procedures.

#### **Evidence provided to ASQA of compliance**

- RPL Application Form for CHC33021
- RPL Application Form for CHC43121
- RPL Application Form for CHC52021
- RPL Enrolment Administration Process
- Sales (RPL) Suitability Evaluation Checklist
- Sales (RPL) Suitability Evaluation Process
- RPL Audit Checklist - Enrolment and Grading - (Program or course name)
- Prospective Student Application Case by Case Evaluation Process
- RPL Plan template
- Student Handbook
- CHC33021 Cert III in Individual Support Disability RAS
- CHC43121 Certificate IV in Disability Support RAS
- CHC52021 Diploma of Community Services RAS
- CHC33021 Cert III in Individual Support Disability-RPL Kit-Section A
- CHC43121 Certificate IV in Disability Support - RPL Kit - Section A
- CHC52021 Diploma of Community Services - RPL Kit - Section A
- LLN Assessment Tools for CHC33021
- LLN Assessment Tools for CHC43121
- LLN Assessment Tools for CHC52021
- CHC33021 Certificate III in Individual Support - Disability - RPL Kit – Overview
- CHC43121 Certificate IV in Disability Support - RPL Kit – Overview

	<ul style="list-style-type: none"> <li>• CHC52021 Diploma of Community Services - RPL Kit - Overview</li> <li>• Course Webpage – CHC33021</li> <li>• Course Webpage – CHC43121</li> <li>• Course Webpage - CHC52021</li> <li>• Assessment Conditions Checklist (ACC) - Self-Assessment CHC33021</li> <li>• Assessment Conditions Checklist (ACC) - Self-Assessment for CHC43121</li> <li>• Assessment Conditions Checklist (ACC) - Self-Assessment for CHC52021</li> </ul>
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	<p><b>Analysis of actions taken and evidence of compliance</b></p> <p>The provider has completed sufficient actions to rectify the non-compliance. This is corroborated by the evidence submitted.</p> <p><b>Finding:</b> Compliant</p>
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<p><b>Clause 1.8 of the Standards for RTOs</b></p>	<p><b>Action required by performance assessment (audit) report</b></p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> <li>• understands the causes of the issues</li> <li>• has rectified its assessment practices (to comply with Clause 1.8) and established appropriate systems that are followed. The evidence to be provided must             <ul style="list-style-type: none"> <li>○ demonstrate the provider will implement an assessment system that ensures assessment:                 <ul style="list-style-type: none"> <li>▪ complies with the requirements of the relevant training product(s)</li> <li>▪ will be conducted in accordance with the Principles of Assessment and Rules of evidence.</li> <li>▪ include the full suite of assessment tools used for a RPL assessment pathway for each unit of identified as non-compliant.</li> </ul> </li> </ul> </li> </ul>
	<p><b>Actions taken by provider to return to compliance</b></p> <p>Please refer to the Letter of Response document. All responses are documented under "Finding 2. Clause 1.8 of the Standards for RTOs"</p> <p><b>Finding 2. Clause 1.8 of the Standards for RTOs</b></p> <p>ASQA's Concern Regarding Workplace Environment and Practical Skills</p> <p>The Provider has not demonstrated that RPL assessments are consistent or address all requirements of the training package. The training package requires assessment of skills in the workplace or under simulated</p>

workplace conditions for all 3 training products; however, the assessment tools and practices do not meet this requirement. Section D Third Party Report does not record evidence that the assessor has confirmed with the workplace supervisor that the student has performed the practical tasks required by the training package. Other tools including the Competency Conversation also do not record sufficient, valid or reliable evidence of assessment of competency.

### **Our Response Regarding the Adequacy of Assessment Tools for Evidence Collection Against Units of Competency**

- We acknowledge and understand ASQA's concern that the training package requires the assessment of skills in the workplace/simulated workplace, and that our assessment tools and practices initially lacked recorded evidence confirming that the assessor had verified information with the workplace supervisor.
- To address this concern, we have taken the following actions:

#### **Updated the Assessment Conditions Checklist:**

We have updated the Assessment Conditions Checklist to be verified with the student prior to enrolment by Sales and Enrolment Team, included as part of the Section C interview between the student and the assessor, and further verified through a signed Third Party Report in Section D Part 1. Additionally, the assessor confirms with the workplace supervisor, and records it in Section D Part 2, that the student is working in an appropriate workplace that meets all the requirements outlined by the training package. This ensures the student is gaining relevant experience in a real workplace environment.

#### **Confirmation of Practical Tasks:**

- We will explain in detail how we ensure our students have access to a real workplace environment and how we verify that students are completing the required practical tasks as outlined by the training package. This is achieved through our processes in Section C, Section D Part 1, and Section D Part 2, which together ensure the student's practical skills are confirmed. Please note that this concern has also been addressed in our previous response under "ASQA's Concern about Workplace Practicum," so we kindly ask that you refer to that section to avoid repetition.

#### **Workplace Conditions vs. Simulated Workplace Conditions**

First and foremost, our students are required to be currently employed in a relevant industry and have been working full-time in relevant positions for the past 12 months. Therefore, **simulated workplace conditions do not apply** to our RPL students, as they are already gaining real-world experience in actual workplaces. This requirement is documented as part of the entry requirements in the **RAS**, on the **Course Webpage**, in the **RPL Application Form**, and across the processes and checklists used by

both the Sales and Enrolment teams. These details were outlined in our previous response.

### **Assessment Conditions Checklist (ACC)**

To ensure that workplace conditions are properly verified, we have implemented the **Assessment Conditions Checklist (ACC)**, which was derived directly from the **RAS: APPENDIX A: Facilities, Equipment, and Resources Requirements**. This checklist was developed by thoroughly reviewing the workplace environment, including all necessary facilities, equipment, and resources. The requirements are sourced from the performance criteria, performance evidence, knowledge evidence, and assessment conditions for each unit of competency, as outlined in the Training Package.

The following is the process used to create the ACC and ensure that the workplace conditions align with the training package requirements (refer to the **RAS** for the course):

#### ***Instructions for Creating the Assessment Conditions Checklist (ACC)***

##### ***Step 1: Review Unit of Competency Requirements***

- *Begin by reviewing the relevant units of competency in the Training Package.*
- *Focus specifically on the performance criteria, performance evidence, knowledge evidence, and assessment conditions listed.*

##### ***Step 2: Extract Relevant Workplace Requirements***

- *Copy and paste all relevant requirements related to the workplace environment (facilities, equipment, resources, and organisational policies) into the corresponding table under each unit.*

##### ***Step 3: Contextualise the Information***

- *Collaborate with industry experts and internal assessors to contextualise each requirement, ensuring they accurately reflect the necessary workplace conditions.*
- *Ensure the requirements cover that students have access to a suitable workplace environment both prior to enrolment and during their RPL process.*

##### ***Step 4: Create the Assessment Conditions Checklist (ACC)***

- *Once contextualised, compile the information into a comprehensive ACC tailored to the qualification.*
- *Ensure the ACC includes all required facilities, equipment, and resources for students to complete their RPL process.*

### **Step 5: Distribute the ACC to Students Prior to Enrolment**

- *Provide the ACC to students as a suitability checklist before their enrolment. This ensures students confirm that they meet the workplace environment requirements before proceeding.*

### **Step 6: Incorporate the ACC into the RPL Assessment Kit**

- *Use the ACC in **Section C** and **Section D, Part 1** of the RPL Assessment Kit to verify that the workplace meets the necessary conditions during the RPL process.*
- *Both the student and their workplace supervisor are required to confirm that the workplace environment aligns with the checklist during interviews.*

### **Verification Process with Employer/Workplace Supervisor**

**In Section D, Part 2: Employer Competency Conversations**, the assessor conducts an interview with the employer to verify that the employer completed the log of hours table in **Section D, Part 1**. This log outlines the dates, work responsibilities, and is signed by the employer. The assessor is required to **document and record** the employer's responses in **Section D, Part 2**.

Some of the key questions include:

1. *Can you confirm that you are the individual who completed the Section D Part 1 third-party report for the student and that the student has performed all of the practical requirements outlined in the report? Could you also confirm that the student had access to all the items listed in the Assessment Conditions Checklist? Finally, can you confirm the location(s) and dates on which you completed the report? Yes/No. Comments:*
2. *Can you please verify the total number of workplace hours (e.g., 120 hours) the student has completed in the log of hours table? Did you observe these responsibilities? Yes/No. Comments:*

In addition, a list of verifying questions has been provided for each unit of competency in relation to the student's practical skills. Assessors are required to **record** the employer's responses after each question in Section D, Part 2. For example for CHC33021:

- *Can you confirm that the student has completed 120 hours performing tasks related to supporting independence and wellbeing? The tasks should be directly related to supporting the independence and wellbeing of individuals, including:*
  - **Recognise and Support Individual Differences:**  
*Respect the social, cultural, and spiritual differences of each person, and support them in expressing their identity*



and preferences. Consider their individual needs, stage of life, and strengths, while promoting activities that reflect their personal values.

- **Promote Independence:** Encourage individuals to recognise their strengths and support their self-care. Assist them in identifying opportunities to use these strengths and provide access to resources and services that help them maintain and build independence.
- **Support Physical Wellbeing:** Promote healthy daily living habits, ensure a safe environment, and recognise any changes in the person's physical condition. Report any hazards, health concerns, or situations beyond your scope according to organisational procedures.
- **Support Social, Emotional, and Psychological Wellbeing:** Use positive communication to promote self-esteem, maintain predictable routines for security, and encourage participation in social, cultural, and spiritual activities. Recognise wellbeing variations, report indicators of abuse or neglect, and seek support for areas outside your expertise.

This process ensures that the assessor has **actively confirmed** with the workplace supervisor that the student has performed the practical tasks required by the training package. The **Assessment Conditions Checklist (ACC)** in **Section C** and **Section D, Part 1** also ensures that both the student and their workplace supervisor have verified that the workplace conditions align with the course requirements, including the use of facilities, equipment, and resources as part of their work responsibilities.

For example, in **Section D, Part 1**, under the heading **Assessment Conditions Checklist**, we have provided the following instructions to the employer:

*"Please review the following lists to indicate the types of workplace equipment, facilities, resources, and organisational policies and procedures that the student/your employee is currently accessing or has had access to as part of their work responsibilities. Specific instructions and information have been provided below where appropriate in italics. Students are expected to meet all the listed criteria to be deemed satisfactory in the Assessment Conditions Checklist (ACC). By ticking/checking each box below, you are declaring that the employee/student has the knowledge and ability to use the following facilities/resources and adheres to the workplace policies and procedures when using these facilities/equipment and resources in the workplace."*

The ACC is a mandatory part of the **RPL Application Form**. Students are required to review, agree to, and sign the checklist to confirm they have

access to all the necessary facilities, equipment, and resources to meet the workplace conditions for the RPL process. This signed confirmation ensures that students and their workplaces meet the training package requirements before they begin the course.

By implementing the ACC and including this checklist as part of the pre-enrolment process, we have ensured that the workplace environment is thoroughly evaluated, and that there is no reliance on simulated workplace conditions. The documentation is embedded within the **RPL Application Form, RPL Assessment Kit**, and is used throughout the RPL process to verify the student's workplace conditions.

### **ASQA's Concern Regarding the Adequacy of Assessment Tools for Evidence Collection Against Units of Competency**

There was no assessment tool that adequately guides the assessors or students on what types of evidence needs to be gathered in the workplace that had a direct link to the unit of competency and the performance evidence/performance criteria.

### **Our Response Regarding the Adequacy of Assessment Tools for Evidence Collection Against Units of Competency**

We acknowledge and understand ASQA's concern regarding the inadequacy of our existing assessment tools in guiding assessors and students on the types of evidence required to meet the units of competency and their associated performance criteria.

To address this concern, we have developed **Section 7.5 – Evidence Required Against Units of Competency** in the RPL Assessment Strategy (RAS). This section is also provided to prospective students prior to enrolment by including it in the **RPL Assessment Kit – Overview and Course Webpage**. Prospective students are required to sign the **RPL Application Form**, confirming that they have read and agree to the RPL Assessment Kit – Overview as well as the **Evidence Required Against Units of Competency**. This information is verified by both the sales and enrolment teams prior to enrolment. This process ensures that prospective students, current students, assessors, and the student support team are fully informed about the types of evidence required for each unit of competency in the course.

Moreover, **the RPL Assessment Kit Overview** provides prospective students/candidates, students, employers, and relevant internal staff members with information about the **RPL Assessment Kit** and the types of evidence required for each section. The document includes essential guidance to help all parties understand the process. The following information is included:

- Understanding how the RPL process works at Traxion Training
- Packaging Rules for the Qualification

- Units under the Qualification
- RPL Assessment Kit
- RPL Assessment Process
- Instructions for Candidate/Student
- How could you achieve recognition of prior learning?
- How can I (the candidate/student) prepare for the RPL process?
- Step 1: Section A – Self-Reflection Questionnaire
- Step 2: Section B – Evidence Portfolio, Section B – Explanatory Guide, and Section D Part 1 – Third Party Report
- Step 3: Section C – Competency Conversations
- Step 4: Section D Part 2 – Employer Competency Conversation
- Step 5: Section E – Assessment Outcome Checklist
- Student RPL Evidence Checklist
- Appendix A: Evidence against Units of Competency

Additionally, we have provided the **Assessment Validation Mapping** document to guide internal staff—including assessors, the student support team, and the grading team—on how the evidence collected in Sections A to D, Part 2 of the RPL Assessment Kit is mapped to the performance evidence, performance criteria, knowledge evidence, and assessment conditions of the training package. This document, presented as an Excel file, contains individual tabs for each unit of competency, clearly showing how each question/task/evidence/requirement in every section of the Kit maps to the specific requirements of the training package. This ensures that all staff members and students have a clear understanding of how the evidence aligns with the training package standards.

### **Development and Integration of Section 7.5 – Evidence Required Against Units of Competencies**

#### **a. Comprehensive Evidence Guidelines**

- **Section 7.5 – Evidence Required Against Units of Competencies:**
  - **Description:** We have developed a detailed section, **7.5 – Evidence Required Against Units of Competencies**, within our RPL Assessment Strategy (RAS). This section clearly outlines the types of evidence that students must gather to demonstrate their competencies in each unit.

- **Purpose:** Ensures that both assessors, prospective students and students and other relevant stakeholders such as employers, student support officers, sales and enrolment teams have a clear understanding of the specific evidence needed, directly linking assessment requirements to training package requirements for each unit of competency.

#### **b. Distribution and Acknowledgement**

- **RPL Assessment Kit Overview:**

- **Description:** The **7.5 Evidence Required Against Units of Competencies** is included in the **RPL Assessment Kit Overview** and **Course Webpage** document provided to all prospective students.
- **Student Declaration:** Students are required to declare that they have understood and agree to the **Evidence Required Against Units of Competencies** in the **Terms and Conditions** section of the **RPL Application Form**. This ensures that students are fully aware of the evidence they need to collect and how it aligns with their units of competency prior to enrolment.

#### **Enhancing Sales and Enrolment Processes to Communicate Evidence Requirements**

##### **Sales (RPL) Suitability Evaluation Checklist**

- **Incorporation of Evidence Requirements:**
  - **Description:** Our **Sales (RPL) Suitability Evaluation Checklist** now includes a specific item: "*Has the prospective student been informed that they are required to access a list of facilities, equipment and resources in accordance to the ACC?*" and "*Has the enrolment process, RPL Assessment Kit - Overview (Section A - Section E as well as Evidence Required Against Units of Competencies), expected duration for completion, engagement and support provided discussed with the prospective student?*"
  - **Purpose:** Ensures that sales personnel explicitly discuss the evidence requirements with prospective students during the pre-enrolment phase, promoting transparency and preparedness.

##### **Sales (RPL) Suitability Evaluation Process**

- **Provision of RPL Assessment Kit Overview:**

- **Description:** As part of the **Sales (RPL) Suitability Evaluation Process**, we have included **Step 2d – Provide an RPL Assessment Kit Overview document**. This document offers an overview of the enrolment process, course outline (Sections A - E, including Evidence Required Against Units of Competencies), expected duration for completion, and the engagement and support provided to prospective students once enrolled.
- **Purpose:** Ensures that sales representatives provide comprehensive information about the evidence requirements and support structures to prospective students, ensuring they are well-informed before enrolment.

### **RPL Enrolment Administration Process**

**Description:** the following content from the enrolment process ensures that the ACC is verified by the enrolment team prior to enrolment.

- *“Proof of Access to Required Workplace Resources and Equipment (Assessment Conditions Checklist - ACC):*

*Requirement: The prospective student must submit the completed ACC, confirming access to required workplace resources and equipment. Note all mandatory criteria must be met.*

*Note: If there are gaps or missing resources, the enrolment team must inform the student that they may not be able to attain the full qualification. Traxion Training does not provide gap training, and only a Statement of Attainment will be issued for successfully demonstrated competencies.”*

### **RPL Audit Checklist - Enrolment and Grading**

**Description:** The following content from the audit checklist ensures that the enrolment and grading teams follow the enrolment process described above:

- *“Confirmed access to all mandatory facilities, equipment, and resources (as per the Assessment Conditions Checklist for the program). If a student declares that they do not meet certain ACC requirements, please contact the student to inform them of the possible outcomes, such as not meeting specific unit requirements.”*

### **Implementation of the Assessment Validation Mapping Document**

#### **a. Direct Linkage to Units of Competency**

### Assessment Validation Mapping Document:

- **Description:** We have developed an **Assessment Validation Mapping** document that maps every question and requirement in **Sections A to D Part 2** of the RPL Assessment Kit to each unit of competency. This mapping includes alignment with performance criteria, performance evidence, knowledge evidence, and assessment conditions.
- **Structure:** The mapping is organised into separate Excel tabs for each unit of competency, providing a clear and direct link between assessment questions/tasks/requirements/evidence and unit requirements.
- **Purpose:** Ensures that all assessment tools are directly linked to the training package requirements, providing a systematic and transparent method for verifying that students have gathered and demonstrated the appropriate evidence.

### Comprehensive Training for Assessors and Staff

#### a. Assessor Training Programs

- **Focus Areas:**
  - **Understanding Evidence Requirements:** Training sessions emphasise the importance of Section 7.5 and how to utilise it effectively during pre and post enrolment assessments.
  - **Conducting Competency Conversations:** Assessors are trained on how to conduct structured interviews with employers to verify the evidence recorded in all sections and the use of Assessment Validation Mapping document.
  - **Using the Assessment Validation Mapping:** Ensures assessors are proficient in using the mapping document to align evidence with unit requirements.

#### b. Ongoing Professional Development

- **Continuous Improvement:** Regular workshops and refresher courses are conducted to keep sales, enrolment teams, student support teams and assessors updated on best practices for evidence verification and competency assessment.

### ASQA's Concern Regarding the Self-Reflection Questionnaire in Section A of the RPL Assessment Kit

Section A: includes a Self-Reflection Questionnaire. The instructions included provided conflicting information as they refer to written questions



and a Competency conversation which is not part of the self-reflection questionnaire. Students are only required to identify how often they do certain tasks in the workplace: Frequently, Sometimes etc.

### **Our Response Regarding the Self-Reflection Questionnaire in Section A of the RPL Assessment Kit**

We acknowledge and understand ASQA's concern regarding the conflicting instructions within Section A – Self-Reflection Questionnaire of our RPL Assessment Kit. Specifically, the issue pertains to references to written questions and a Competency Conversation, which are not relevant to the self-reflection process.

To address this, we have removed all references to these elements from Section A's instructions and updated the instructions to provide clearer details, including definitions of frequency to ensure clarity in the self-reflection process.

### **Removal of Conflicting References in Section A**

#### **a. Elimination of Irrelevant References**

- **Description:**
  - All mentions of written questions and Competency Conversations within **Section A – Self-Reflection Questionnaire** have been removed.
- **Purpose:**
  - To eliminate any confusion for students by ensuring that the instructions accurately reflect the intended self-reflection process without referencing assessment components that do not apply to this section.

#### **b. Streamlined Instructions**

- **Description:**
  - The instructions now solely focus on the frequency of task performance, guiding students to assess how often they perform specific tasks in their workplace using the provided response options: Frequently, Sometimes, Never, and I Already Have This Unit.
- **Purpose:**
  - To provide clear and concise guidance, ensuring students understand that their self-reflection is based on the regularity of task execution.

### **Clarification of Task Frequency Definitions**

## a. Enhanced Definition of Response Options

- **Description:**

- The response options within the Self-Reflection Questionnaire have been clearly defined to specify the frequency of task performance:
  - **Frequently:** You perform these tasks at least once a week or more (e.g., weekly or multiple times per week, indicating regular, ongoing responsibilities).
  - **Sometimes:** You perform these tasks less than once a week but at least once a month (e.g., 1-3 times a month or several times per year).
  - **Never:** You have never performed these tasks in your current or previous roles.
  - **I Already Have This Unit:** You have already attained this unit either through Traxion Training or another recognised institution.

- **Purpose:**

- To ensure that students can accurately self-assess their experience and competency levels based on their actual workplace activities.

## b. Example Clarifications in Instructions

- **Description:**

- Additional examples and clarifications have been incorporated into the instructions to guide students in making accurate self-reflections.

- **Purpose:**

- To enhance the reliability of self-assessments by providing clear benchmarks for students to evaluate their task performance frequency.

### ASQA's Concern Regarding the Consistency and Reliability of Competency Conversations in Section C

Section C Competency Conversation instructions for assessors stated that the conversation may be conducted in the workplace, or over the phone, via video, or in person, thus the context of assessment is not consistent and therefore does not record reliable evidence of competency. Under Context and Conditions information in the Conversation tool, there is

guidance for assessors on conducting the conversation by observing the student perform various tasks, but it is not evident that all students will be observed in the workplace because instructions also state that the conversation can be conducted over the phone, or elsewhere. Additionally, the Conversation tool is not provided to the candidates. There are no instructions for students on what they are required to do in order to demonstrate competency in the conversation. It is also not evident that there is sufficient guidance to assessors to ensure consistent information/guidance is provided by a range of different assessors conducting the Conversation in different contexts. Therefore, it is not evident that the assessment system and practices record valid or sufficient evidence of knowledge and skills integrated with their practical application in the workplace. The benchmark answers in the Conversation did not provide sufficient guidance to assessors. For example, for unit CHCCCS031 Provide Individualised Support, some questions such as Question 2 require the student to identify what types of equipment or materials were used in the performance. However, the benchmark guidance does not include the benchmark answers or identify the types of equipment the student should respond with.

### **Our Response Regarding the Consistency and Reliability of Competency Conversations in Section C**

We acknowledge and understand ASQA's concerns regarding the inconsistencies and lack of sufficient guidance in our Competency Conversations within **Section C** of the **RPL Assessment Kit**. To address these issues, we have implemented the following significant revisions and enhancements. Please refer to the Instructions to Assessors and Instructions to Students in the RPL Assessment Kit, Section C: Competency Conversations, for further details.

#### **Removal of References to Conducting Section C Over the Phone**

##### **a. Elimination of Phone Assessments**

- **Description:**
  - All references to conducting Competency Conversations over the phone have been removed from the instructions for assessors.
- **Purpose:**
  - To ensure that Competency Conversations are conducted in environments that allow for effective observation and reliable evidence collection, thereby enhancing the validity and reliability of the assessments.

#### **Inclusion of Instructions for Assessments to Be Conducted via Video Conference or In-Person**

##### **a. Updated Assessment Methods**

- **Description:**

- Assessments are now conducted either via video conferencing platforms (e.g., Zoom, Microsoft Teams) or in-person at the workplace.

- **Purpose:**

- To maintain a consistent context for all Competency Conversations, ensuring that assessors can effectively observe and evaluate the student's competencies in real-time or through reliable visual mediums.

#### **b. Structured Environment Guidelines**

- **Description:**

- Assessors are provided with detailed guidelines on setting up the assessment environment, whether virtual or physical, to ensure consistency across all Competency Conversations.

- **Purpose:**

- To create a standardised assessment environment that facilitates accurate observation and assessment of the student's practical skills and knowledge.

#### **Development of a Consistency and Reliability Table for Assessment Methods**

##### **a. Assessment Methods Table**

- **Description:**

- A comprehensive table has been developed outlining how each assessment method (video conferencing and in-person) should be conducted to maintain consistency and reliability in evidence collection.

- **Key Elements:**

- **Environment Setup:** Guidelines for creating a conducive environment for assessment and specified that the student needs to be at the workplace.
- **Equipment Requirements:** Specific equipment needed for each method.
- **Assessment Protocols:** Step-by-step procedures to follow during the conversation.
- **Documentation Standards:** Standards for recording and storing assessment evidence.

- **Purpose:**

- To ensure that all assessors follow a uniform approach, thereby maintaining the integrity and reliability of the competency evidence collected.

### **Provision of Conversational Questions and Guide to Students Prior to Section C Interviews**

#### **a. Student Instructions for Competency Conversations**

- **Description:**

- a. Students are now provided with a copy of the conversational questions and a guide prior to their Competency Conversations. These materials do not include benchmark answers but offer clear expectations on how to prepare for the interview. E.g. The following has been added under Assessor Instructions: *“Students should be provided with this conversation tool prior to the interview, allowing them time to prepare. Note that student responses may vary based on their individual workplace experience.”* And *“After enrolment and before scheduling the appointment, provide students with this conversation tool so that they can adequately prepare.”*

- **Purpose:**

- To enable students to prepare adequately for their Competency Conversations, ensuring they understand what is expected of them.

#### **b. Enhanced Transparency**

- **Description:**

- Clear instructions have been added to inform students about the Competency Conversations process, including the types of questions they will be asked and the responses they need to provide.

- **Purpose:**

- To promote transparency and reduce anxiety for students by providing them with a clear understanding of the assessment process.

### **Rectification of Benchmark Answers in Competency Conversations**

#### **a. Inclusion of Benchmark Answers for Equipment Types**

- **Description:**

- Question 2 of **CHCCCS031 Provide Individualised Support** has been rectified to include benchmark answers that specify the types of equipment or materials students should reference in their responses. This revision has been applied to all relevant questions across Sections in the Kit across all qualifications.

- **Example Revision:**

- **Original Question 2:** *Can you describe a situation where you engaged in open and respectful consultation with the person and their family, carer, or others they have identified to understand specific physical, sensory, or cultural needs or preferences?*

- ✓ *Confirm the context in which behaviours have been demonstrated to gather evidence of:*
- ✓ *What types of equipment or materials were used in performance*
- ✓ *Contingencies of the job role being performed by the student*
- ✓ *Physical environment and conditions*
- ✓ *Relationships with the clients that students engaged with*
- ✓ *Any timeframes for completing tasks in their workplace roles*

- **Revised Benchmark Answer:**

**Key Elements in Response:**

*One situation example provided.*

*Key Elements in Response:.*

*1. Open and Respectful Consultation with the Person and Their Family, Carer, or Identified Others*

*Student initiates a dialogue with both the person and their support network.*

*Student acknowledges and incorporates physical, sensory, or cultural needs.*

*Engagement was inclusive, with no evidence of discriminatory or dismissive behaviour.*

*2. Understanding of Specific Physical, Sensory, or Cultural Needs or Preferences*



*Student explains how they adapt their approach to accommodate these needs, providing specific examples.*

*Evidence of strategies used to address physical or sensory disabilities and cultural sensitivities. The student accurately identifies and reflects on the individual's needs or preferences, ensuring that care is person-centred.*

*Demonstrates awareness of cultural practices, physical limitations, or sensory sensitivities.*

### *3. Equipment or Materials Used in Performance*

*Performance Indicator:*

*The student selected and used appropriate equipment or materials necessary to meet the person's physical or sensory needs.*

*Ensures the equipment used aligns with the identified needs of the client.*

*Student demonstrates correct use of relevant tools or materials to accommodate physical needs (e.g., mobility aids, hearing devices, sensory tools).*

### *4. Contingencies in the Job Role*

*The student responds appropriately to unexpected circumstances or changes in the care environment.*

*Adaptability is demonstrated when responding to contingencies like behavioural changes, equipment failure, or unforeseen client needs.*

*The student shows flexibility and problem-solving skills when managing contingencies.*

*Provides examples of modifying care plans or approaches based on unexpected changes.*

### *5. Physical Environment and Conditions*

*The student demonstrates an understanding of the physical environment's impact on care delivery.*

*Ensures that the environment is safe, accessible, and suitable for the client's needs.*

*Adjustments were made to ensure the physical environment was conducive to the person's care, such as ensuring accessibility or minimising sensory triggers.*

### *6. Relationships with Clients*

*The student builds positive, trusting relationships with clients, maintaining professional boundaries.*

*Demonstrates person-centred communication and respects the client's preferences and autonomy.*

*Consistent feedback from the client, family, or carer about the student's respectful engagement.*

*Professional relationships were maintained, with the student consistently prioritising the client's needs.*

#### **7. Timeframes for Completing Tasks**

*The student demonstrates time management skills by completing tasks within the designated timeframes.*

*Adjustments are made when necessary to ensure the person's needs are met without rushing or compromising care.*

*The student is able to meet deadlines for care tasks while ensuring that the quality of care is not compromised.*

*The student accommodates any unforeseen delays while maintaining effective care.*

#### **b. Comprehensive Review of All Questions**

- **Description:**

- All questions within the Competency Conversation tool have been reviewed and updated to include benchmark answers where necessary, ensuring that assessors have clear guidance on the expected responses related to equipment, environments, and other key elements.

- **Purpose:**

- To provide assessors with sufficient guidance to evaluate student responses consistently and reliably, enhancing the overall quality and integrity of the assessment process.

#### **Enhanced Guidance for Assessors to Ensure Consistency**

##### **a. Comprehensive Assessor Instructions**

- **Description:**

- Detailed instructions have been provided to assessors on conducting Competency Conversations either via video conference or in-person, ensuring that all assessors follow a standardised approach regardless of the assessment context.

- **Key Elements:**

- **Preparation:** Instructions on reviewing student materials and understanding the assessment criteria.
  - **Conducting the Conversation:** Step-by-step guidelines on how to administer the conversation, including the use of benchmark questions.
  - **Recording Responses:** Clear protocols for documenting student responses accurately.
  - **Post-Conversations:** Guidelines on summarising findings and determining competency outcomes.
- **Purpose:**
    - To ensure that all assessors conduct Competency Conversations in a consistent manner, thereby maintaining the reliability and validity of the competency evidence collected.

#### **b. Use of Assessment Validation Mapping Document**

- **Description:**
  - The **Assessment Validation Mapping Document** has been provided to ensure that every question and requirement in Sections A to D Part 2 is mapped to each unit of competency against its performance criteria, performance evidence, knowledge evidence, and assessment conditions.
- **Purpose:**
  - To provide a direct linkage between assessment questions and unit requirements, ensuring that all evidence collected is relevant and sufficient to demonstrate competency.

#### **ASQA's Concern Regarding Section B**

Section B: Explanatory Guide includes a list of documents and evidence that are required to be submitted. However, it is not clear the purpose of this as the Guide refers to documents such as resumes and qualifications that would be required to be submitted during the enrolment process (although not indicated in the information provided to students). Evidence was not provided in this document that supports evidence is gathered for all units of competency. Additionally, the document is not clearly aligned to any unit and it could not be confirmed that this is valid.

#### **Our Response Regarding Section B Explanatory Guide**

We acknowledge and understand ASQA's concerns regarding the clarity, alignment, and validity of Section B – Explanatory Guide within our RPL Assessment Kit.

To address these concerns, we have updated the descriptions related to the RPL Assessment Kit in the **RAS** under the heading "**Course Assessment**." These updates provide detailed explanations of the purpose and design of each section, including why this document/section was developed and how it supports the overall RPL process.

We have also outlined how each stakeholder—including the enrolment team, assessors, and students—should use this document, ensuring that all parties are aligned in its application. Additionally, we have clarified when the document should be provided to students, as described under "**7.2.1. The RPL Assessment Kit: A Comprehensive Blueprint for Qualification Assessment**" in the **RAS**.

### **Added Explanations about Section B Explanatory Guide in the RAS**

#### **a. Purpose**

*"This guide assists assessors in evaluating the documents provided in Section B, ensuring consistency and quality in the assessment process."*

#### **b. Design**

- **Standardisation:**
  - Includes definitions, possible document titles, samples, and descriptions to standardise the understanding of required documents across different workplaces.
- **Content Requirements:**
  - Outlines what students need to submit, such as detailed resumes, position descriptions, professional development records, and workplace-related documents.

#### **c. Usage**

- **For Assessors:**
  - Ensures that all submitted documents in **Section B** meet the sufficiency and quality standards required for assessment.
  - Helps assessors identify key information within each document, ensuring that all required details are present and correctly aligned with the training package criteria.
  - Note that documents collected prior to enrolment, such as the resume, position descriptions, and previous academic records, are uploaded into the student management system for assessors to access and cross-reference against other responses in the Kit.
- **For Sales and Enrolment Teams:**

- Provided to sales and enrolment teams to verify proof of employment supporting documents before enrolment, ensuring clarity and consistency in document submissions.
- It's important to note that only certain documents, like these pre-enrolment materials, are within the sales/enrolment team's scope.

- **For Students:**

- Serves as a reference to understand the types of documents they need to provide and the level of detail required, ensuring that their submissions are complete and accurate.

- **For Employers:**

- Employers may use the Explanatory Guide to understand the documentation requirements and provide students with the necessary workplace documents that meet the outlined standards. This ensures that the evidence provided is relevant and sufficient for the assessment process. Some workplaces may use different names for documents; therefore, it is important to understand the purpose, rationale, and content required by the RPL process. Documents should be aligned with the required content, rather than focusing solely on the document's title.

### **Use of Assessment Validation Mapping Document**

- **Description:**

- The **Assessment Validation Mapping Document** maps each evidence item in **Section B – Evidence Portfolio** to specific units of competency and their performance criteria, ensuring comprehensive coverage and validation.

- **Structure:**

- Organised into separate Excel tabs for each unit of competency, providing a clear and direct link between assessment requirements and evidence collection.

- **Purpose:**

- Ensures that all required evidence is gathered for every unit, addressing the concern about incomplete evidence coverage and validating the alignment with unit requirements.

### **Evidence provided to ASQA of compliance**

- RPL Assessment Kit for CHC33021 folder including RAS, Overview, Section A, B, B (Explanatory Guide), C, D Part 1, D Part 2, E, Assessment Validation Mapping
- RPL Assessment Kit for CHC52021 folder including RAS, Overview, Section A, B, B (Explanatory Guide), C, D Part 1, D Part 2, E, Assessment Validation Mapping
- RPL Assessment Kit for CHC43121 folder including RAS, Overview, Section A, B, B (Explanatory Guide), C, D Part 1, D Part 2, E, Assessment Validation Mapping

### **Analysis of actions taken and evidence of compliance**

The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.

**Finding:** Compliant

### **Clause 5.1 of the Standards for RTOs**

#### **Action required by performance assessment (audit) report**

Provide evidence that demonstrates it:

- understands the causes of the issues.
- has ensured it will determine and consider the prospective student's existing skills and competencies to provide accurate advice on the most appropriate training product to meet their needs prior to enrolment or the commencement of training and assessment.
- has established and implemented appropriate systems to ensure students are enrolled into an appropriate training product, considering their existing knowledge, experience and skills.

#### **Actions taken by provider to return to compliance**

Please refer to the Letter of Response document. All responses are documented under "Finding 3. Clause 5.1 of the Standards for RTOs"

#### **Finding 3. Clause 5.1 of the Standards for RTOs**

##### **ASQA's Concern Regarding Enrolment Systems and Processes**

Current enrolment systems and processes are inadequate. Sales (RPL) Suitability Evaluation Checklist and other processes in the student enrolments are finalised by the Sales (RPL) team. All 3 training products require assessment of practical skills in the workplace but the Provider's systems do not demonstrate that the Provider verifies that all RPL candidates have access to a suitable work placement prior to enrolment.

##### **Our Response Regarding Enrolment Systems and Processes**

We acknowledge ASQA's concern regarding the inadequacy of our current enrolment systems and processes, particularly in verifying that



RPL candidates have access to a suitable work placement prior to enrolment.

To address this issue, we have made improvements to the Sales (RPL) Suitability Evaluation Checklist and other enrolment processes to ensure that workplace access is thoroughly verified before a candidate is enrolled.

Key actions taken include:

1. **Verification of Workplace Access:**

All RPL candidates are now required to demonstrate that they have access to a suitable workplace prior to enrolment. This is a mandatory step in the **Sales (RPL) Suitability Evaluation Checklist**.

Prospective students must provide proof of current employment in a relevant role, which is verified by the sales and enrolment teams. Documentation such as employment letters, position descriptions, and confirmation of access to the necessary facilities, equipment, and resources are required to ensure that practical skills can be assessed.

2. **Assessment Conditions Checklist (ACC):**

The ACC plays a critical role in verifying workplace suitability. It ensures that students have access to the necessary workplace conditions—such as appropriate facilities, equipment, and resources—required for practical assessments. The **ACC** is part of the **RPL Application Form** and must be reviewed and signed by the prospective student to confirm that they meet all required workplace conditions.

3. **Work Experience Requirement:**

We require that all students have a minimum of **12 months of full-time** equivalent work experience within the past two years, as well as relevant working hours for units that require practical placements (such as practicum units). For example, students enrolled in CHC33021 must **self-declare** in **Section A** of the RPL Assessment Kit that they have completed **at least 120 hours** of relevant work. This is a critical step to ensure that students meet the unit-specific requirements prior to enrolment. This requirement is clearly outlined in the **Entry Requirements** in the **RAS**, the **RPL Application Form** (*"I understand that I have an obligation to fulfil work placement hours outlined on the course-related webpage, where applicable. Traxion is not responsible for sourcing placements. For RPL students, it is expected that they have already acquired all work placement hours related to the unit of competency in the qualification prior to enrolment."*), and listed on our **Course Webpage** to ensure that all candidates are aware of these criteria prior to enrolment. This process has been applied to the units that require mandatory work placement hours in CHC52021 and all other qualifications.

4. **Evidence Required Against Units of Competency:**

As part of the pre-enrolment process, the **Evidence Required**

**Against Units of Competency** document is provided to students. They are required to review and declare that they understand the amount and type of evidence needed for each unit of competency, including workplace **practicum hours**, as well as the **skills and knowledge** required by the training package. This ensures students are fully informed of the evidence they must gather to meet the RPL requirements.

5. **Summary of Unit Requirements:**

Specific unit requirements, including the work responsibilities associated with **workplace practicums**, are summarised in the RAS and provided to students via the **Course Webpage** prior to enrolment. This ensures that prospective students understand the responsibilities and practical experience required for the course.

6. **Access to Workplace Confirmed Prior to Enrolment:**

Our enrolment processes have been updated to ensure that no candidate is enrolled without verification of their workplace access. The enrolment team cross-checks all documents against the requirements of the training package to confirm that the workplace meets the conditions necessary for practical skills assessment.

7. **Section A of the RPL Assessment Kit** allows students to self-declare, prior to enrolment, that they possess certain practical skills and have accumulated the mandatory practicum hours required for specific units in the qualification. For example, students enrolled in **CHC33021** must confirm they have completed **120 hours** of relevant practical experience, which is essential for meeting the requirements of the qualification.

8. **aXcelerate System Tracking:**

All relevant documents, such as proof of employment and workplace resources, are uploaded into the aXcelerate system. This ensures that assessors can access the necessary evidence confirming the candidate's workplace suitability, and eliminates the need for re-collection of documents at a later stage.

**Updated Checklists to Include Section A and Assessment Conditions Checklist Prior to Enrolment**

**Sales (RPL) Suitability Evaluation Checklist**

• **Description:**

- The **Sales (RPL) Suitability Evaluation Checklist** has been updated to incorporate **Section A – Self-Reflection Questionnaire** and the **Assessment Conditions Checklist**. This ensures that all RPL candidates undergo a comprehensive self-reflection and assessment of their work placement conditions before enrolment.

• **Examples from the Checklist:**

- **Section A Integration:**
  - *"Has the prospective student completed Section A Self Reflection Questionnaire? Does it have any "never"s in their responses? If so inform prospective students that they would not be able to complete the qualification and that Traxion does not provide any gap training."*
- **Assessment Conditions Checklist Integration:**
  - *"Has the prospective student been informed that they are required to access a list of facilities, equipment and resources in accordance to the ACC?"*

#### **RPL Audit Checklist - Enrolment and Grading**

- **Description:**
  - The **RPL Audit Checklist - Enrolment and Grading** has been updated to include verification of **Section A** and the **Assessment Conditions Checklist** as part of the audit process.
- **Examples from the Checklist:**
  - **Section A Integration:**
    - *"Completed Section A for self-reflection for the program (all questions have a response). If not reject the application."*
  - **Assessment Conditions Checklist Integration:**
    - *"Confirmed access to all mandatory facilities, equipment, and resources (as per the Assessment Conditions Checklist for the program). If a student declares that they do not meet certain ACC requirements, please contact the student to inform them of the possible outcomes, such as not meeting specific unit requirements."*

#### **RAS: Assessment Conditions Checklist (ACC)**

- **Description:**
  - The **Assessment Conditions Checklist** has been incorporated into the **RAS** under **Entry Requirements**, included within the **RPL Application Form** and **RPL Enrolment Administration Process** to verify that candidates have the necessary workplace resources, equipment, and support to undertake practical skill assessments.

- The **Training and Assessment Strategy (RAS)** has been revised to include detailed procedures for the enrolment process, ensuring that **Section A** and the **Assessment Conditions Checklist** are completed and verified before finalising enrolment.
- **Examples from the RAS:**
  - *Prospective students must submit a detailed list of facilities, equipment, and resources available in their current workplace. This list, referred to as the Assessment Conditions Checklist (ACC), is based on the requirements outlined in the Training Package units of competency. The purpose of gathering this evidence is to confirm that students have already attained the necessary practical experience in a real workplace environment. Access to all mandatory items on the ACC list is essential to ensure that students have met the requirements before enrolment.*

#### **RPL Application Form**

- **Description:**
  - The **RPL Application Form** has been updated to include sections for **Section A – Self-Reflection Questionnaire** and the **Assessment Conditions Checklist**, ensuring that students provide detailed information about their work placements before enrolment.
- **Examples from the RPL Application Form:**
  - **Relevant Fields:**
    - *" Also attach proof of skills across units of competency by completing and submitting the Section A Self-Reflection Questionnaire."*
    - *Proof that you have skills across all units of competency chosen for this qualification: Please provide the completed Section A Self-Reflection Questionnaire, which is available on our website under the relevant course information. It is vital that you go through this document thoroughly, as it serves as a self-assessment of your skills and experience across all units of competency. Please understand that Traxion Training does not provide any gap training. If you indicate on this document that you have "never" completed certain activities required for specific units, we are unable to issue a full qualification certificate. Instead, a Statement of Attainment will be issued for the units where you have*

*been granted a successful RPL status. This ensures that your experience aligns with the requirements of the qualification.”*

- *“ Also attach a completed copy of the Assessment Conditions Checklist (ACC) to confirm that you, the student, have access to the required workplace facilities, equipment, and resources for this course (See ACC below). If gaps or missing resources are identified, such as not meeting the ACC criteria, you may not be able to attain the full qualification, and only a Statement of Attainment for the units of competency with a successful outcome will be issued. Note that Traxion Training does not provide gap training.”*

### **RPL Enrolment Administration Process**

- **Description:**

- The **RPL Enrolment Administration Process** has been enhanced to include verification steps for **Section A** and the **Assessment Conditions Checklist** before confirming enrolment.

- **Examples from the RPL Enrolment Administration Process:**

- **Process Steps Updated:**

- *“ Proof of Skills Across All Units of Competency:*

*Requirement: Prospective students must demonstrate competency in all units required for the qualification in order to attain the full certificate.*

*Document: Completed Section A Self-Reflection Questionnaire (available on the course information webpage).*

*Note: Traxion Training does not provide gap training. If the student indicates "never" for certain activities, Traxion cannot issue a full qualification certificate. Instead, a Statement of Attainment will be issued for units where the student has successfully completed RPL.”*

- *“Proof of Access to Required Workplace Resources and Equipment (Assessment Conditions Checklist - ACC):*

*Requirement: The prospective student must submit the completed ACC, confirming access to required workplace resources and equipment. Note all mandatory criteria must be met in order to attain the full certificate.*

*Note: If there are gaps or missing resources, the enrolment team must inform the student that they may not be able to attain the full qualification.*

*Traxion Training does not provide gap training, and only a Statement of Attainment will be issued for successfully demonstrated competencies.”*

### **Section A – Self Reflection Questionnaire**

The following content has been added to Section A and required to be completed by the prospective student prior to enrolment.

- *“Responsibilities for the 120 hours must include the following:*

*Assist individuals in daily activities while encouraging them to maintain as much independence as possible. This includes supporting them in personal care, household tasks, mobility, and communication.*

*Empower individuals to make decisions about their own lives, offering choices and respecting their preferences.*

*Help individuals maintain physical, emotional, and mental well-being by promoting a healthy lifestyle and engaging them in activities that improve their quality of life.*

*Monitor and respond to any changes in a person's health, including mental or emotional distress, by communicating with relevant health professionals.*

*Act as an advocate for the individual where necessary, ensuring their rights and preferences are respected and their needs are met, both in personal situations and in accessing services.*

*Identify potential risks related to safety, health, and well-being, and take appropriate actions to mitigate those risks while ensuring the person still maintains control over their decisions.*

*Adhere to workplace health and safety regulations and report hazards or incidents promptly.*

*Effectively communicate with individuals, their families, and healthcare teams.*

*Use active listening skills to understand and respect the individual's preferences and concerns.*

*Demonstrate understanding and empathy in all interactions, respecting the dignity and individuality of the person you are supporting.*

*Address challenges and issues that arise in daily support tasks by finding solutions that enhance independence without taking away the person's control.*

*Adjust approaches to meet the individual's needs and abilities, ensuring personalised and responsive support.*



*Organise daily activities, ensuring that individuals receive adequate support while respecting their routines and preferences.”*

### **Evidence Required Against Units of Competency**

#### **Integrated in Course Webpage and RPL Assessment Kit Overview**

The following content has been added to the **Course Webpage** and prospective students are required to sign and declare their agreement to it in the RPL Application Form prior to enrolment. E.g. for CHC33021:

- *“Section A: The student must indicate that they frequently or sometimes have experiences promoting independence and wellbeing over a 120-hour support period for at least three individuals.”*

#### **Course Webpage**

The following content has been added to the Course Webpage, and prospective students are required to sign and declare their agreement to it in the RPL Application Form prior to enrolment. E.g. for CHC33021:

- *“Resume: While a resume is a useful supporting document, it cannot be used as standalone proof of experience. It must be accompanied by the documents listed above to demonstrate 12 months of accumulated work experience and to verify the 120 hours of practical experience as required by the qualification.”*
- *“Work Experience Logbooks or Time Sheets: Logbooks that document hours worked, especially if the student has been self-employed or working as a contractor, indicating the total hours of work accumulated, including 120 hours of practical experience.”*
- *“Proof of 120 Hours of Experience (CHCCCS040 - Support Independence and Wellbeing):*

*Document Referenced: Course Information Webpage for CHC33021 Certificate III in Individual Support (Disability), RPL Application Form and reference to Training.gov.au - CHCCCS040 - Support Independence and Wellbeing*

*Documents required to verify 120 hours of work experience for this unit, including logbooks and employer letters.”*

#### **ASQA's Concern Regarding Currently Working Requirement**

The TAS includes an entry requirement that students are currently working in the community services sector prior to enrolment; however, the Sales team checklist or other enrolment documents do not include verification by the Provider of this pre-entry requirement.

## Our Response Regarding Adequate Advisement of Evidence Requirements in the RPL Assessment Pathway

We acknowledge ASQA's concern that while the Training and Assessment Strategy (TAS) includes the entry requirement that students are currently working in the community services sector prior to enrolment, this requirement was not previously verified in the Sales team checklist or other enrolment documents.

To address this issue, we have implemented the following updates:

### 1. **Sales Team Checklist Update:**

The **Sales (RPL) Suitability Evaluation Checklist** has been updated to include a mandatory step for verifying that the prospective student is currently employed in the community services sector. Sales representatives now require prospective students to provide documentation, such as a letter from the employer, recent payslips, or employment contract, and including position description, as evidence of their current employment. This ensures that the pre-entry requirement of working in the community services sector is verified before the enrolment process begins.

### 2. **Enrolment Documentation Update:**

All relevant enrolment documents, including the **RPL Application Form**, have been updated to reflect the requirement for students to provide proof of current employment in the sector. "Are you currently employed in a course related job role in a related industry?" The enrolment team cross-checks this information with the documentation provided to ensure compliance with the entry requirements outlined in the TAS. E.g. "Proof of Current Employment in a Related Workplace - Required documentation - Please provide one or a combination of the following examples:

*A letter on official company letterhead that verifies the student is currently employed in the relevant industry, outlining the student's role and confirming that their work duties are in alignment with the qualification requirements. (e.g. Letter from Employer or/and workplace position description or/and employment contract)*

*Resume: The resume must be included to show the continuity of employment, but it should be accompanied by one of the official documents mentioned above to validate the employment status, as the resume itself is considered self-reported evidence."*

### 3. **RAS Updates:**

The **RPL Assessment Strategy (RAS)** includes the following key sections that address the entry requirements:

#### **Entry Requirements (Section 9):**

- **Specific Course Entry Requirements (Section 9.1):**  
Detailed criteria that prospective students must meet, including:
  - **12 Months of Experience:** A requirement for at least 12 months of full-time equivalent work experience in a related industry within the last 2 years, with acceptable evidence outlined.
  - **Currently Employed:** A requirement for current employment in a relevant role throughout the RPL process.e.g. for CHC33021 under the heading of “Currently Employed”: *“It is essential that the prospective student is currently employed in a role related to the disability or community services sector at the time of application and throughout the RPL process”*
- **Sales (RPL) Suitability Evaluation Checklist:** The sales team utilises this checklist to assess prospective students' suitability based on predefined criteria, including:
  - **Current Employment:** Confirmation of current employment in a relevant role. The sales team must *“confirm the prospective student is currently employed in a related role and industry, e.g., in the community services industry.”*

4. **RPL Enrolment Administration Process:**

As part of the **RPL Enrolment Administration Process**, the following steps ensure the verification of current employment in a related workplace:

- **Proof of Current Employment in a Related Workplace:**
  - **Requirement:** Prospective students must demonstrate that they are currently working in a relevant industry.
  - **Examples of Acceptable Documentation** (one or a combination of the following):
    - A letter on official company letterhead or with an email signature block verifying current employment in the relevant industry, outlining the student’s role and confirming alignment with qualification requirements.

- Workplace position description or employment contract including position description.
- Resume (included as self-reported evidence but must be accompanied by one of the official documents listed above).
- *“Proof of Current Employment in a Related Workplace:*

*Requirement: Prospective students must demonstrate that they are currently working in a relevant industry.*

*Examples of Acceptable Documentation (provide one or a combination of the following):*

*A letter on official company letterhead or email signature block verifying current employment in the relevant industry, outlining the student’s role and confirming alignment with qualification requirements.*

*Workplace position description or employment contract.*

*Resume (included as self-reported evidence but must be accompanied by one of the official documents listed above).”*

#### **5. RPL Audit Checklist - Enrolment and Grading:**

The **RPL Audit Checklist - Enrolment and Grading** has been updated to include checks to verify the student’s current employment. The audit process ensures that:

- The answers provided in the application demonstrate that the student is currently working in the relevant industry.
- The industry and position align with the course requirements.
- If the industry or position does not meet course requirements, the application is rejected.
- *“Current Employment Status*

*Full-time, Part-time, Casual, Self-employed, Unemployed, Other*

*Satisfactory if selected and also meets 12 months full time experience; if unemployed reject application; if missing, advise the prospective student to complete this section.)”*

- *“Currently Employed in a Relevant Sector e.g. disability or community services depending on the course they are applying - refer to the RAS.*

*Confirm the prospective student is currently employed in a role related to the relevant sector.*

*(As per entry requirements, it is essential for the prospective student to be currently employed in a relevant role; if not, do not proceed with enrolment and advise the prospective student. please refer the the Job Title Guide and the RAS for details)*

*Details Required:*

*Current position and responsibilities description from the workplace.*

*(Satisfactory if provided; must align with the correct AQF Level responsibilities; if missing or not aligned, advise the prospective student accordingly.)*

*Supporting Documents Examples:*

*Employment Contracts*

*(Must specify role, responsibilities, and duration and be current; if missing or insufficient, advise the prospective student.)*

*Payslips*

*(Recent (within 30 days) and past payslips verifying ongoing employment; if missing, advise the prospective student.)*

*Employer Reference Letters*

*(On company letterhead, outlining role, duties, stating that the person is currently employed and length of employment; must be signed; if missing, advise the prospective student.)*

*Resume*

*(indicates that they are currently employed in the relevant role. Cannot be standalone proof; must be accompanied by other documents; if only a resume is provided, advise the prospective student to submit additional evidence.)”*

**6. Student Handbook:**

The **Student Handbook**, provided to prospective students prior to enrolment, contains content under the headings **Language, Literacy and Numeracy (LLN)** and **LLN Policy and Procedures**, which are consistent with the RAS. Specifically:

- *" Not all students enrolled in an RPL pathway need to complete an LLN assessment prior to enrolment because all of our students have been working in the workplace and/or are currently working in the workplace and are expected to have a certain level of LLN skills. However, an LLN*

*assessment will be provided to students who have advised us through the application form that they need help e.g. would like to access a formal LLN Assessment or if the SSO and/or assessor feels LLN support is needed during the student journey. We strongly advise informing the team of any considerations regarding your language, literacy, and numeracy abilities."*

**7. aXcelerate System Tracking:**

Verified employment documents are uploaded into the **aXcelerate** system, ensuring sales, enrolment teams and other relevant staff can confirm that the student meets the pre-entry employment requirement. This process ensures that students meet the necessary criteria before progressing in the RPL or course enrolment process.

**ASQA's Concern Regarding Currently Working Requirement**

The Provider's RPL assessment pathway does not adequately advise students of the evidence requirements (portfolio) of evidence that would be required to be submitted that ensures students would be able to meet the training package requirements.

**Our Response Regarding Adequate Advisement of Evidence Requirements in the RPL Assessment Pathway**

We acknowledge ASQA's concern that the current RPL assessment pathway does not adequately advise students of the portfolio of evidence required to meet the training package requirements.

To address this issue, we have taken the following actions:

- 1. Evidence Required Against Units of Competency Document:**  
We have developed an Evidence Required Against Units of Competency document that outlines the specific evidence required for each unit of competency. This document is provided to students as part of the RPL Assessment Kit Overview and is also available on the Course Webpage prior to enrolment. The document clearly states the types of evidence required, including workplace practicum hours, knowledge, and skills, ensuring students are fully informed of the evidence they need to gather to meet the RPL requirements.
- 2. Pre-Enrolment Guidance:**  
As part of the pre-enrolment process, prospective students are required to review the **Evidence Required Against Units of Competency** document and declare that they understand the amount and type of evidence needed for each unit. This declaration is included in the **RPL Application Form**, which must be signed before enrolment. This ensures that students are fully aware of what is required before beginning the RPL process.

### 3. **RPL Assessment Kit - Comprehensive Overview:**

The RPL Assessment Kit includes detailed instructions on the evidence portfolio required, explaining the types of evidence that will be assessed, such as resumes, job descriptions, employer letters, logs of hours, and practical skills demonstrations. This information is aligned with the requirements of the training package and is designed to ensure that students meet all the necessary performance criteria, knowledge evidence, and assessment conditions.

### 4. **Support from Sales and Enrolment Teams:**

During the enrolment process, the Sales and Enrolment Teams provide examples of acceptable evidence to prospective students. The teams ensure that students understand what is required and that only relevant documents, such as proof of employment and qualifications, are submitted.

### 5. **Continuous Communication and Support:**

Throughout the RPL process, assessors and the student support team work closely with students to ensure that the evidence provided aligns with the training package requirements. Feedback is provided when necessary to guide students in gathering additional or more appropriate evidence, if required.

## **Inclusion of Evidence Required Against Units of Competencies in Key Documents**

### **a. Training and Assessment Strategy (RAS)**

- **Update Implemented:**
  - **Section 7.5 – Evidence Required Against Units of Competencies** has been added to the RAS.
- **Purpose:**
  - This section provides detailed guidelines on the types of evidence required for each unit of competency, ensuring that students are clearly informed about the specific evidence needed to meet training package requirements.
- **Impact:**
  - Students are advised of the evidence needed per unit of competency prior to enrolment, enabling them to prepare and gather the necessary documentation effectively.

### **b. RPL Assessment Kit Overview**

- **Update Implemented:**



- **Evidence Required Against Units of Competencies** has been integrated into the **RPL Assessment Kit Overview**.

- **Purpose:**

- To provide students with a comprehensive understanding of the evidence requirements for each unit of competency as part of the overall RPL assessment process.

- **Impact:**

- Ensures that students are aware of what evidence is required for each unit before they commence their RPL assessment, thereby facilitating better preparation and alignment with training package standards.

### **Advisement and Agreement of Evidence Requirements in the RPL Application Form**

#### **a. RPL Application Form**

- **Update Implemented:**

- Added a section where students are advised of the evidence requirements for each unit of competency.
- Included a declaration section where students must sign off agreeing to the evidence requirements.

- **Purpose:**

- To ensure that students are fully informed about the specific evidence they need to provide and acknowledge their understanding and commitment to submitting the required documentation.

- **Impact:**

- Enhances accountability and ensures that students are prepared to meet the training package requirements, thereby increasing the likelihood of successful RPL outcomes.

### **Enhanced RPL Enrolment Administration Process**

#### **a. Sales (RPL) Suitability Evaluation Checklist**

- **Update Implemented:**

- Included the item: *"Confirm the prospective student is currently employed in a related role and industry, e.g., in the community services industry."*

- **Purpose:**

- To verify that candidates meet the entry requirements of being currently employed in the relevant sector, which is essential for practical skills assessment.

- **Impact:**

- Ensures that only eligible candidates with appropriate work experience are enrolled, maintaining the integrity of the RPL process.

#### **b. Sales (RPL) Suitability Evaluation Process**

- **Update Implemented:**

- Integrated verification steps to confirm current employment in the community services sector before finalising enrolment.

- **Purpose:**

- To provide a systematic approach for verifying candidates' eligibility based on their current employment status.

- **Impact:**

- Strengthens the enrolment process by ensuring that all RPL candidates have access to suitable work placements necessary for practical assessments.

#### **RPL Audit Checklist - Enrolment and Grading**

##### **a. RPL Audit Checklist - Enrolment and Grading**

- **Update Implemented:**

- Added verification points to ensure that candidates are currently employed in the community services sector as part of the audit process.

- **Purpose:**

- To provide a framework for auditing the enrolment process, ensuring compliance with entry requirements.

- **Impact:**

- Enhances quality assurance by systematically verifying that all RPL candidates meet the pre-entry requirements, thereby addressing the concern about inadequate verification.

#### **Student Advisement of Evidence Requirements**

##### **a. Communication of Evidence Requirements**

- **Update Implemented:**

- Prior to enrolment, prospective students are advised of the specific evidence required for each unit of competency through the **Course Webpage**, **RPL Assessment Kit Overview** and the **RPL Application Form**.

- **Purpose:**

- To ensure that students have a clear understanding of the documentation they need to submit to meet training package requirements.

- **Impact:**

- Facilitates better preparation and submission of relevant evidence, enhancing the efficiency and effectiveness of the RPL assessment process.

### **Student Agreement to Evidence Requirements**

#### **a. Sign-Off on RPL Application Form**

- **Update Implemented:**

- Students are required to sign off on the RPL Application Form, agreeing to the evidence requirements outlined for each unit of competency.

- **Purpose:**

- To formally acknowledge that students understand and commit to providing the necessary evidence to meet training package standards.

- **Impact:**

- Promotes accountability and ensures that students are prepared to meet the evidence requirements, thereby supporting successful RPL outcomes.

### **Conclusion**

Through the comprehensive revisions and enhancements to our RPL assessment pathway, particularly by adding **Evidence Required Against Units of Competencies** in both the **Training and Assessment Strategy (RAS)** and the **RPL Assessment Kit Overview**, we have ensured that:

- **Clear Advisement of Evidence Requirements:**

- Students are thoroughly informed of the evidence requirements for each unit of competency prior to enrolment,

facilitating better preparation and alignment with training package requirements.

- **Formal Agreement of Evidence Requirements:**
  - The inclusion of a sign-off section in the **RPL Application Form** ensures that students acknowledge and agree to the evidence requirements, promoting accountability and integrity in the RPL process.
- **Enhanced Verification Processes:**
  - Updates to the **Sales (RPL) Suitability Evaluation Checklist, Sales (RPL) Suitability Evaluation Process, and RPL Audit Checklist - Enrolment and Grading** ensure that all RPL candidates are verified for current employment in the community services sector, addressing previous inadequacies in verification.

### **Systematic Quality Assurance**

We recognise the importance of demonstrating that our quality assurance processes meet the Standards for RTOs for all qualifications, including those that were not audited. In response to the issues identified in the audit report for the selected qualifications, we did not limit our focus to addressing those particular issues. Instead, we have taken proactive steps to systematically update all other qualifications, ensuring consistency and compliance throughout our entire training portfolio.

To reinforce our commitment to quality, we have also launched a comprehensive internal audit process to thoroughly review our practices, policies, procedures, and documentation across all relevant clauses of the standards. This internal audit includes not only the qualifications that were audited but extends to all qualifications, ensuring that our systems and processes are robust and aligned with regulatory requirements.

The audit process is being carefully documented in our internal audit minutes and continuous improvement register, ensuring full transparency and accountability. For each issue identified, we assign the relevant action items to responsible and accountable teams. These teams are tasked with not only addressing the immediate concerns but also implementing sustainable changes that align with the Standards for RTOs and broader regulatory requirements.

### **Training and Communication to Stakeholders**

To ensure all stakeholders are fully informed and equipped to implement these changes, we are rolling out a structured training and communication plan. This plan involves:

- **Regular Training Sessions:** We will conduct mandatory training sessions for all staff, including sales, enrolment, grading, assessors,

administrative staff, and compliance teams. These sessions will focus on the updated policies, procedures, and any systemic changes resulting from the internal and ASQA audit. Training will include specific case studies to ensure all staff understand how these changes will be reflected in day-to-day operations. This is to be done weekly.

- **Internal Communication Channels:** Clear and consistent communication will be provided through internal platforms such as email bulletins, intranet updates, and team meetings. These updates will outline the changes being implemented, the reasoning behind them, and how they impact roles and responsibilities across the organisation. This has already started during leadership meetings, which are held every Friday.
- **Feedback Mechanisms:** Staff will have the opportunity to provide feedback or raise concerns regarding the new processes. This will ensure a two-way dialogue and allow for the refinement of procedures where necessary. This has already started during leadership meetings, which are held every Friday.

### **Ensuring Changes Are Reflected in Practices**

To ensure that changes identified through the internal audit are effectively embedded in our operations, we have established the following processes:

1. **Policy and Procedure Updates:** All relevant policies, procedures, and operational documents will be reviewed and updated to reflect the changes identified in the audit. These documents will be made readily available to staff via our internal document management system, ensuring everyone has access to the latest versions. This has already started, and the document library has been shared with all teams.
2. **Process Alignment:** We will conduct workflow and process mapping exercises to ensure that all operational activities align with the updated policies. This will involve reviewing each step of our assessment processes to ensure consistency and adherence to regulatory requirements. This has already started, and the workflow and tasks has been shared with all teams.
3. **Monitoring and Review:** Following the implementation of changes, regular reviews and internal audits (monthly) will be scheduled to monitor compliance and effectiveness. We will document these reviews in our continuous improvement register, ensuring that any further adjustments are made promptly. This started during the first week of each month.
4. **Accountability:** Each action item from the audit will be assigned to specific teams or individuals who will be held accountable for its

implementation. Progress on these items will be tracked, with updates reported regularly during management meetings to ensure all actions are on track for completion. The project plan has been completed, and actions have been assigned to different teams.

### **Ongoing Support and Continuous Improvement**

To support continuous improvement, we will maintain ongoing communication with stakeholders, providing additional refresher training or updates as needed. All changes will also be periodically reviewed to ensure they continue to meet regulatory requirements and best practice standards.

In summary, our comprehensive audit process, combined with effective training and communication, will ensure that all changes are systematically implemented and reflected in our practices, with the goal of maintaining compliance and enhancing the quality of our operations.

### **Evidence provided to ASQA of compliance**

- RPL Enrolment Administration Process
- Sales (RPL) Suitability Evaluation Checklist
- Sales (RPL) Suitability Evaluation Process
- RPL Audit Checklist - Enrolment and Grading - (Program or course name)
- Prospective Student Application Case by Case Evaluation Process
- RPL Plan template
- Student Handbook
- CHC33021 Certificate III in Individual Support Disability-RPL Kit-Section A
- CHC43121 Certificate IV in Disability Support - RPL Kit - Section A
- CHC52021 Diploma of Community Services - RPL Kit - Section A
- RPL Application Form for CHC33021
- RPL Application Form for CHC43121
- RPL Application Form for CHC52021
- LLN Assessment Tools for CHC33021
- LLN Assessment Tools for CHC43121
- LLN Assessment Tools for CHC52021
- CHC33021 Certificate III in Individual Support - Disability - RPL Kit – Overview
- CHC43121 Certificate IV in Disability Support - RPL Kit – Overview
- CHC52021 Diploma of Community Services - RPL Kit - Overview
- Course Webpage – CHC33021
- Course Webpage – CHC43121
- Course Webpage - CHC52021

- Assessment Conditions Checklist (ACC) - Self-Assessment CHC33021
- Assessment Conditions Checklist (ACC) - Self-Assessment for CHC43121
- Assessment Conditions Checklist (ACC) - Self-Assessment for CHC52021

**Analysis of actions taken and evidence of compliance**

The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.

**Finding:** Compliant