



# REPORT

## Audit report: Advance-forward Pty Ltd

Date/s of audit: 27 March 2019

Date report created: 1/04/2019

Date report updated: 9/07/2019

## Organisation details

Organisation's legal name:	Advance-forward Pty Ltd
Trading name/s:	Advance-Forward RTO
RTO number:	45256
CRICOS number:	n/a

## Audit team

Lead auditor:	Karen Noble
Assistant/s:	Daniel Taylor

## Audit details

Application number/s:	n/a	
Audit number:	AUDREC0009162	
Audit reason	Post initial	
Address of site/s visited:	3/6-8 Vanessa Bvd, Springwood QLD 4127	
Date/s of audit:	27 March 2019	
Organisation's contact for audit:	Scott Percival Scott_Percival@outlook.com	Chief Executive Officer 0449 892 545

## Original finding at time of audit

### Audit finding: Serious non-compliance

Report completed by: Karen Noble

Practice	Standards for RTOs 2015	Finding
Marketing/ Recruitment	4.1	Not compliant
Enrolment	5.1, 7.3	Compliant
	5.2	Not compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.2, 1.3, 1.13, 1.14, 1.16	Compliant
	1.1, 1.8	Not compliant
	1.15, 1.17-1.20	Not audited
Completion	3.1	Not compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	Compliant

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 4/06/2019 : Compliant

Report completed by: Daniel Taylor

Practice	Standards for RTOs 2015	Finding
Marketing/Recruitment	4.1	Compliant
Enrolment	5.1, 5.2, 7.3	Compliant

Support and Progression	1.7	Compliant
Training and Assessment	1.2, 1.3, 1.13, 1.14, 1.16	Compliant
	1.1, 1.8	Compliant
	1.15, 1.17-1.20	Not Audited
Completion	3.1	Compliant
Regulatory Compliance /Governance	2.3, 2.4, 8.2	Compliant

## Background

Summary of organisation and management structure:

- The RTO was registered for its initial registration in October 2017. It is structured with Mr Scott Percival as Chief Executive Officer and Head Trainer, Allison Devlin as Director, two full time administration staff, Annette Smith as Compliance consultant, and Marc Campbell as IT Manager. The organisation is supported by contract trainer/assessors: Mr Ken Percival and Mr Frank Devlin for First Aid, and Mr Graeme Marwood for Security Operations.

Scope of registration:

- CPP20212 Certificate II in Security Operations
- CPP30411 Certificate III in Security Operations
- *CPPSEC3014A Control persons using baton*
- *CPPSEC3015A Restrain persons using handcuffs*
- *CPPSEC3018A Provide for the safety of persons at risk*
- *CPPSEC3110 Control persons using batons*
- *CPPSEC3111 Restrain persons using handcuffs*
- *HLTAID001 Provide cardiopulmonary resuscitation*
- *HLTAID003 Provide first aid*

Suburb and state of all delivery locations:

- Springwood; Toowoomba

Third party usage:

- The RTO holds a third party arrangement with Big Dog Training, a Toowoomba based organisation providing training services.

Core clients/target groups:

- Main clients are existing workers in the security industry looking to upgrade.

Training Revenue (Funded or fee for service):

- Fee for service

Total number of current enrolments as at audit date:

- As the RTO provides short duration courses, it has no current enrolments. Financial year to date enrolment numbers is 117.

In preparing the audit report, consideration has been given and reference made, where relevant, to:

- information provided by students as part of a student survey or interview.
- information provided directly by Advance-forward Pty Ltd to ASQA
- existing information and records held by ASQA concerning Advance-forward Pty Ltd

- information provided to ASQA’s auditors and documentation reviewed during the site audit of Advance-forward Pty Ltd conducted on 27 March 2019.
- other publicly available information - including but not limited to, information published on the organisation’s and third party websites.

## Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
CPP20212	Certificate III in Security Operations	Face to face	0
CPP30411	Certificate III in Security Operations	Face to face	0
CPPSEC3002A	<i>Manage conflict through negotiation</i>	Face to face	0
HLTAID001	<i>Provide cardiopulmonary resuscitation</i>	Face to face	0
HLTAID003	<i>Provide first Aid</i>	Face to face	0

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

## Interviewees

Name	Position	Training products
Scott Percival	CEO/Trainer	CPP20212, CPP30411
Allison Devlin	Director	n/a
Annette Smith	Compliance	n/a
Marc Campbell	Manager	n/a

## About this Report

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

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

Correcting non-compliance may require:

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

## Original Action required by RTO

Advance-forward Pty Ltd did not meet all requirements for clauses 4.1, 5.2, 1.1, 1.8, and 3.1.

At audit, the RTO provided evidence to address non-compliance with clauses 4.1 and 5.2.

The RTO remains non-compliant with clauses 1.1, 1.8 and 3.1.

Remedial action is required for the following training products:

- **CPP20212 Certificate II in Security Operations**
  - CPPSEC3002A *Manage conflict*

- *HLTAID001 Provide cardiopulmonary resuscitation*
- *HLTAID003 Provide first aid*

*The organisation is required to provide evidence that demonstrates:*

Clause 1.1, 1.8:

- The organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product.
- The organisation has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
  - Include the full suite of assessment tools for each unit of competency identified as non-compliant
  - Demonstrate the organisation will implement an assessment system that ensures assessment:
    - Complies with the assessment requirements of the relevant training products
    - Will be conducted in accordance with the principles of assessment and rules of evidence
- The organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled that were assessed in a manner that did not meet the requirements of clause 1.8. Remedial action needs to cover current students and students who were assessed by your organisation in the past 3 months.

### **Audit finding following analysis of additional evidence**

Following analysis of additional evidence provided by Advance-forward Pty Ltd on 04/06/2019 the RTO:

- provided sufficient evidence to demonstrate compliance with clauses 1.1, 1.8 and 3.1

Refer to analysis of additional evidence detailed under each clause in this report for further information.

## Areas of non-compliance

### Marketing/Recruitment Practices

#### Standards for RTOs Clause 4.1

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
  - i) a learner will successfully complete a training product on its scope of registration; or
  - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
  - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

#### **CPP20212 Certificate II in Security Operations**

The following was reviewed in relation to marketing:

- Information on the RTO's website [www.adv-fwd.com.au](http://www.adv-fwd.com.au)

The organisation's marketing practices are not compliant with the requirements of Clause 4.1 of the Standards for RTOs as marketing is not accurate and factual in all cases.

Evidence of non-compliant practice includes:

- Wording on the RTO's website relating to CPP20212 Certificate II in Security Operations was misleading with regard to the issuance of additional units of competency exceeding the packaging rules for the qualification. The wording implied a Statement of Attainment for the units of competency would be issued without further training and assessment.

At the time of audit, the RTO amended its website to reflect the training and assessment process required to be undertaken in order to issue a Statement of Attainment in addition to the qualification. No further evidence is required.

The RTO is compliant with clause 4.1.

## Enrolment

### Standards for RTOs Clause 5.2

*Original Finding: **Not compliant***

*Finding following additional evidence: **Compliant***

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:
  - i) estimated duration;
  - ii) expected locations at which it will be provided;
  - iii) expected modes of delivery;
  - iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and
  - v) any work placement arrangements.
- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.
- d) the learner's rights, including:
  - i) details of the RTO's complaints and appeals process required by Standard 6; and
  - ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;
- e) the learner's obligations:
  - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;
  - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and
  - iii) any materials and equipment that the learner must provide; and
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

### **CPP20212 Certificate II in Security Operations**

The following was reviewed in relation to enrolment:

- Information on the RTO's website [www.adv-fwd.com.au](http://www.adv-fwd.com.au)
- Student enrolment information
- Learner management system

The organisation's enrolment practices are not compliant with the requirements of Clause 5.2 of the Standards for RTOs as it has not ensured it provides information prior to enrolment or the commencement

of training and assessment, information about the training and assessment services the RTO will provide to the learner.

Evidence of non-compliant practice includes:

- Wording on the RTO's website relating to CPP20212 Certificate II in Security Operations was misleading with regard to the issuance of additional units of competency exceeding the packaging rules for the qualification. The wording implied a Statement of Attainment for the units of competency would be issued without further training and assessment.

At the time of audit, the RTO amended its website to reflect the training and assessment process required to be undertaken in order to issue a Statement of Attainment in addition to the qualification. No further evidence is required.

The RTO is compliant with clause 5.2.

## Training and Assessment

### Training Delivery and Assessment

#### Standards for RTOs Clause 1.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **Compliant***

**The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.**

#### **CPP20212 Certificate II in Security Operations**

The following was reviewed in relation to training and assessment:

- Training and assessment strategies for qualifications audited

The organisation's training and assessment practices are not compliant with the requirements of Clause 1.1 of the Standards for RTOs as the RTO's training and assessment strategies and practices are not consistent with the requirements of training packages and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

Evidence of non-compliant practice includes:

- In its training and assessment strategy, the RTO described its rationale for completion of extra units of competency within its CPP20212 qualification as being required for licensing as a Crowd Controller and Security Guard. However, the wording implied the units of competency would be recorded on the record of results even though their inclusion exceeds the packaging for the qualification.  
*At the time of audit, the RTO amended its wording to identify the units of competency would be awarded on a separate Statement of Attainment. No further action is required for this aspect of the non-compliance.*
- As non-compliance was identified with Clause 1.8, the RTO has not demonstrated its training and assessment practices are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

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#### **Analysis of additional evidence:**



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## CPP20212 Certificate II in Security Operations

The evidence provided has addressed the non-compliance and/or impact of the non-compliance to students. Specifically, the RTO has demonstrated that its training and assessment practices are consistent with the requirements of the relevant training package and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled. (refer to clause 1.8 for details)

The RTO is compliant with clause 1.1.

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### Standards for RTOs Clause 1.8

**Original Finding: *Not compliant***

**Finding following additional evidence: *Compliant***

**The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):**

- a) complies with the assessment requirements of the relevant training package or VET accredited course; and**
- b) is conducted in accordance with the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2.**

Table 1.8.1 Principles of Assessment

Fairness	The individual learner's needs are considered in the assessment process. Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs. The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.
Flexibility	Assessment is flexible to the individual learner by: <ul style="list-style-type: none"><li>• reflecting the learner's needs;</li><li>• assessing competencies held by the learner no matter how or where they have been acquired; and</li><li>• drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.</li></ul>
Validity	Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner. Validity requires: <ul style="list-style-type: none"><li>• assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance;</li><li>• assessment of knowledge and skills is integrated with their practical application;</li><li>• assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and</li><li>• judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.</li></ul>
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.

Table 1.8.2 Rules of Evidence

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Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

## CPP20212 Certificate II in Security Operations

### CPPSEC3002A Manage conflict

The following evidence was reviewed in relation to assessment:

- Purchased assessment tools (Security Training Australia):
  - Written question and answer
  - Practical assessment tasks
  - Observation checklist
- Completed student assessment items (and the assessment tools used):
  - Security Training Australia purchased assessment tools
  - Students AL, DW, EO

The organisation's practices are not compliant with the requirements of Clause 1.8 of the Standards for RTOs. The evidence provided does not confirm the organisation has an assessment system that addresses training product requirements and does not ensure all assessments are conducted in accordance with the Principles of Assessment and the Rules of Evidence.

**The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:**

- **of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.**
- **that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.**

Evidence of non-compliant assessment practice includes:

- Validity and Sufficiency – the assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Required Skills:
    - The RTO was undertaking practical assessment for this unit of competency within the assessment for the unit of competency *CPPSEC3013 Control persons using empty hand techniques*. The associated assessment tool did not identify that the assessment captured requirements for both units of competency, and no other assessment was available for the practical component of *CPPSEC3002A*.
  - Required Knowledge:
    - The RTO was not retaining records of assessment of the candidate's knowledge of the phonetic alphabet. Although an assessment activity was conducted, it was not competency based and the results were not utilised to inform the judgement of competency.
- Fairness – the assessment tools do not provide clear information to the learner and assessor to fully inform them of the assessment process and conditions.
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements

of the training product(s) and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:

- Students AL, DW, EO:
  - No evidence was available to demonstrate the above students had completed the assessment relating to knowledge of the phonetic alphabet.

*HLTAID001 Provide cardiopulmonary resuscitation*

*HLTAID003 Provide first aid*

The following evidence was reviewed in relation to assessment:

- Purchased assessment tools (Security Training Australia):
  - Written question and answer
  - Practical assessment tasks
  - Observation checklist
- Completed student assessment items (and the assessment tools used):
  - Security Training Australia purchased assessment tools
  - Students WD, WF, PM

The organisation's practices are not compliant with the requirements of Clause 1.8 of the Standards for RTOs. The evidence provided does not confirm the organisation has an assessment system that addresses training product requirements and does not ensure all assessments are conducted in accordance with the Principles of Assessment and the Rules of Evidence.

**The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system and implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:**

- **of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.**
- **that confirms students were assessed as meeting all the requirements of the training product(s) in which they were enrolled.**

Evidence of non-compliant assessment practice includes:

- Validity and Sufficiency – the assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Performance evidence:
    - The RTO's assessment instrument for capturing evidence of practical skills pertaining to cardiopulmonary resuscitation (CPR) do not ensure evidence of adult and infant CPR will be retained. Whilst a task was included to ensure both manikins are assessed, the associated observation checklist did not identify which manikin was used.
- Reliability – The assessment tools do not contain sufficient performance benchmarks for each skill/behaviour to be demonstrated; therefore, it cannot be confirmed that all training package requirements will be met and that consistent judgements will be made across a range of learners and assessors.
- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training product(s) and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
  - Student WD:
    - Evidence did not demonstrate the student had completed the practical component of the assessment.

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***Analysis of additional evidence:***

## CPP20212 Certificate II in Security Operations

### CPPSEC3002A Manage conflict

The following additional evidence was provided:

- Doc 2
- Doc 3 (Phonetic Alphabet Homework)
- Response to Post Initial Audit Findings
- Completed phonetic alphabet assessments for students: AL, DW, and EO

The evidence provided has addressed the non-compliance and the impact of the non-compliance to students. Specifically:

- The rectification evidence provided by the RTO demonstrated that its amended assessment system addresses all training product requirements and ensures assessments will be conducted in accordance with the Principles of Assessment and the Rules of Evidence.
- The RTO provided evidence that students AL, DW, and EO had completed the assessment relating to knowledge of the phonetic alphabet.

Remedial Action:

- The completed phonetic alphabet assessments contained in Doc 3 has addressed the impact of the non-compliance to students.

### HLTAID001 Provide cardiopulmonary resuscitation

### HLTAID003 Provide first aid

The following additional evidence was provided:

- Doc 4 (CPR and CPR Practical Assessments)
- Response to Post Initial Audit Findings
- Completed Practical Assessment for Student: WD

The evidence provided has addressed the non-compliance and the impact of the non-compliance to students. Specifically:

- The rectification evidence provided by the RTO demonstrated that its amended assessment system addresses all training product requirements and ensures assessments will be conducted in accordance with the Principles of Assessment and the Rules of Evidence.
- The evidence provided by the RTO demonstrates that student WD had completed the practical component of the assessment.

Remedial Action:

- The completed CPR and CPR Practical Assessments contained in Doc 4 has addressed the impact of the non-compliance to students.

The RTO is compliant with clause 1.8.

## Completion

### Standards for RTOs Clause 3.1

**Original Finding: Not compliant**

**Finding following additional evidence: [Compliant](#)**

**The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.**

**CPP20212 Certificate II in Security Operations**

*CPPSEC3002A Manage conflict*

*HLTAID001 Provide cardiopulmonary resuscitation*

*HLTAID003 Provide first aid*

The following was reviewed in relation to completion:

- Completed student assessment items – students WD, AL, DW, EO
- Issued qualifications

The organisation's completion practices are not compliant with the requirements of Clause 3.1 of the Standards for RTOs as the RTO has not ensured it issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package.

Evidence of non-compliant practice includes:

- As non-compliance was identified with clause 1.8, the RTO has issued AQF certification documentation to learners whose assessment did not meet the requirements of the training products.

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***Analysis of additional evidence:***

**CPP20212 Certificate II in Security Operations**

*CPPSEC3002A Manage conflict*

*HLTAID001 Provide cardiopulmonary resuscitation*

*HLTAID003 Provide first aid*

The evidence provided has addressed the non-compliance and impact of the non-compliance to students. (refer to clause 1.8 for details)

The RTO is compliant with clause 3.1.