



# REPORT

## Audit report: EIM TRAINING PTY LTD

RTO number:	31408
CRICOS number:	N/A
Date/s of audit:	10 Dec 2019 - 11 Dec 2019
Date report created:	12 December 2019
Date report updated:	27/02/2020

## Organisation details

Organisation's legal name:	EIM TRAINING PTY LTD
Trading name/s:	EIM TRAINING
RTO number:	31408
CRICOS number:	N/A

## Audit team

Lead auditor:	Tegan Watson
Auditor/s:	Mark Shrubshall

## Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0009974
Audit reason/s:	Compliance Monitoring
Address of site/s visited:	Level 1 10 Marine Parade Southport QLD 4215 Australia
Date/s of audit:	10 Dec 2019 - 11 Dec 2019
Organisation's contact for audit:	Nicholas Bottrall Director nick.bottrall@eim.edu.au 0755757575

## Original finding at time of audit

### Audit finding: Serious non-compliance

Report completed by: Tegan Watson

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1	Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	Compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.1*, 1.2*, 1.3, 1.8*, 1.13, 1.14, 1.15, 1.16, 1.17*, 1.18*, 1.20*	Not compliant
Completion	3.1*	Not compliant

\*Indicates a non-compliant clause

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 17/02/2020: Compliant

Report completed by: Tegan Watson

Practice	Standards for RTOs	Finding
Training and Assessment	1.1, 1.2, 1.8, 1.17, 1.18, 1.20	Compliant
Completion	3.1	Compliant

\*Indicates a non-compliant clause

## Background

Summary of organisation and management structure:

- CEO and owner, who is supported by general manager, training manager, compliance manager, administration and trainers and assessors.

Scope of organisation's registration:

- See TGA

Suburb and state of all delivery sites:

- Gold Coast
- Brisbane
- Cairns

Third party usage:

- No third parties

Core clients/target groups:

- Skilled workers

Training Revenue (Funded or fee for service):

- PQS
- User choice
- FFS

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

- CHC30113 Certificate III in Early Childhood Education and Care: 39
- CHC50113 Diploma of Early Childhood Education and Care: 75
- UEE40411 Certificate IV in Electrical – Instrumentation: 348
- BSB51918 Diploma of Leadership and Management: 2

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 EIM TRAINING PTY LTD to ASQA.
- Existing information and records held by ASQA concerning EIM TRAINING PTY LTD.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of EIM TRAINING PTY LTD conducted on 10 Dec 2019 - 11 Dec 2019.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
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<i>CHC30113 Certificate III in Early Childhood Education and Care</i>	Mixed	39
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Mixed	75
<i>UEE40411 Certificate IV in Electrical - Instrumentation</i>	Mixed	348
<i>BSB51918 Diploma of Leadership and Management</i>	Mixed	2

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

## Interviewees

Name	Position	Training products
Nick Bottrall	Director	NA
Michelle Bottrall	General Manager	NA
Melisa White	Training Manager	CHC30113 and CHC50113
Zoe Rundle-Curry	Compliance Manager	NA

## About this Report

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

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

Correcting a non-compliance may require:

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

## Original action required by Organisation

EIM TRAINING PTY LTD did not meet all requirements for clauses 1.1, 1.2, 1.8, 1.18, 1.20 and 3.1.

Remedial action is required for the following training products:

- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50113 Diploma of Early Childhood Education and Care*
- *UEE40411 Certificate IV in Electrical - Instrumentation*
- *BSB51918 Diploma of Leadership and Management*

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

### Training and assessment

*Standards for RTOs Clause 1.1 and 1.2*

- the organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, including the amount of training provided
- the organisation carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product sampled that were impacted by training and assessment practices that did not meet the requirements of the training product (including amount of training). Remedial action needs to cover current students and students who enrolled or completed with your organisation in the past three months.

#### *Standards for RTOs Clause 1.8*

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

#### *Standards for RTOs Clauses 1.18 – 1.20*

- the organisation now has appropriate processes to ensure it only uses trainers/assessors meet the requirements of the standards to provide training and assessment (Clause 1.18-1.20)
- the trainers/assessors currently used by the organisation meet the requirements of the standards (Clause 1.18-1.20)

### **Completion**

#### *Standards for RTOs Clause 3.1*

- the organisation now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product sampled that were issued with AQF certification documentation and were not assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course. Remedial action needs to cover students issued with AQF certification in the past three months.

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

**Following analysis of additional evidence provided by EIM TRAINING PTY LTD on 17/02/2020, the organisation:**

- provided sufficient evidence to demonstrate compliance with:  
Standards for RTOs:  
1.1  
1.17  
1.18  
1.2

1.20  
1.8  
3.1

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

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

##### Standards for RTOs Clause 1.2

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

For the purposes of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to:

- a) the existing skills, knowledge and the experience of the learner;
- b) the mode of delivery; and
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

#### CHC30113 Certificate III in Early Childhood Education and Care

#### CHC50113 Diploma of Early Childhood Education and Care

- The following evidence was reviewed:
  - CHC30113 Certificate III in Early Childhood Education and Care training and assessment Strategies.
  - CHC50113 Diploma of Early Childhood Education and Care training and assessment Strategies.
- The organisation's documented training and assessment strategy contains conflicting and/or unclear information regarding the amount of training provided to the target student cohort. For example, but not limited to:
  - The classroom training and assessment strategies for CHC50113 Diploma of Early Childhood Education and Care indicate a 28 month duration. However the course structure and delivery plan do not provide sufficient information regarding amount of training to be provided by the organisation after month 14.
- The documented training and assessment strategy for delivery of the above training product is not consistent with documentation produced by the organisation or demonstrated practice. For example, but not limited to:
  - The organisations marketing indicates that students will attend class 2 days per week for the duration of tier course with attendance between 9am-3pm. With this attendance, the students would be receiving 12 hours of face to face training per week, however the training

and assessment strategies indicates that students receive 12 hours of face to face training per month.

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*Analysis of additional evidence*

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

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

Standards for RTOs Clause 1.8	
<i>Original Finding: <b>Not compliant</b></i>	
<i>Finding following additional evidence: <b>Compliant</b></i>	
<b>The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):</b>	
<b>a) complies with the assessment requirements of the relevant training package or VET accredited course; and</b>	
<b>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.</b>	
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> </ul>

	<ul style="list-style-type: none"> <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	
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.

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

**BSB51918 Diploma of Leadership and Management**

**UEE40411 Certificate IV in Electrical – Instrumentation**

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

**CHC30113 Certificate III in Early Childhood Education and Care**

CHCECE005 Provide care for babies and toddlers

- The following evidence was reviewed:
  - Master assessment tools
  - Benchmarking
  - Work placement logbook
  - Cloud assess system
  - Completed student assessment

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 practical checklist is not a valid or sufficient mechanism to ensure that all performance evidence requirements of the unit of competency are being fully gathered and assessed. Specifically in regards to the quantity of occasions each performance evidence is required to be assessed and context regarding the assessment.
- 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 and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
  - MP



- MSR
  - The assessment tool is not a sufficient mechanism to ensure that all required performance evidence of the unit of competency are being assessed and evidence gathered.
  - The online system cloud assess did not contain the full assessment 1, as per the marking guide that was provided (indicated there should be 10 questions), however online system only showed 4 questions completed by MP and MSR. Therefore unable to confirm if the students have been assessed on all required knowledge evidence required.
  - The completed file for MP indicated that the student was working at a centre, the RTO provided a log of the student's hours, however no indication as to what the student was employed as or what activities were conducted during the hours worked. Therefore unable to confirm that the performance evidence below was met:
    - performed the activities outlined in the performance criteria of this unit during a period of at least 120 hours of work in at least one regulated education and care service
  - The completed logbook for MSR demonstrated hours worked within work placement, however the log showed that the student spend the majority of her 138 hours in the Kindy room, Prep room and the Junior Toddler room (log did not show any Babies room). Therefore unable to confirm that the student met all required performance evidence of the unit.

### **CHC50113 Diploma of Early Childhood Education and Care**

HLTAID004 Provide an emergency first aid response in an education and care setting

- The following evidence was reviewed:
  - Master assessment tools
  - Benchmarking
  - Third party report
  - Cloud assess system
  - Completed student assessment

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 practical checklist is not a valid or sufficient mechanism to ensure that all performance evidence requirements of the unit of competency are being fully gathered and assessed. For example, but not limited to:
      - performed at least 2 minutes of uninterrupted single rescuer cardiopulmonary resuscitation (CPR) (5 cycles of both compressions and ventilations) on an adult resuscitation manikin placed on the floor
      - performed at least 2 minutes of uninterrupted single rescuer CPR (5 cycles both compressions and ventilations) on a child resuscitation manikin placed on the floor
      - performed at least 2 minutes of uninterrupted single rescuer CPR (5 cycles both compressions and ventilations) on an infant resuscitation manikin placed on a firm surface
  - Knowledge Evidence:
    - The assessment tool is not a sufficient mechanism to ensure that all students are assessed on and evidence gathered for the following knowledge evidence requirements. For example, but not limited to:
      - appropriate use of an AED, including placement of pads for adults and children aged older than 8 years

- specific considerations when using an AED on children aged between 1 and 8 years, including identification of AED with paediatric capability, paediatric voltage and use of paediatric pads
- basic anatomy and physiology relating to:
  - o infant respiratory systems and implications for provision of CPR
- 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 and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:
  - o PM
  - o PP
- The assessment tool is not a sufficient mechanism to ensure that all required knowledge and performance evidence of the unit of competency are being assessed and evidence gathered.

### **BSB51918 Diploma of Leadership and Management**

BSBLDR502 Lead and Manage effective workplace relationships

- The following evidence was reviewed:
  - o Master assessment tools
  - o Benchmarking
  - o Third party report
  - o Learner guides
  - o Cloud assess system

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:
  - o Performance Evidence:
    - The practical checklist is not a valid or sufficient mechanism to ensure that all performance evidence requirements of the unit of competency are being fully gathered and assessed. For example, but not limited to:
      - Provide leadership through own behavior including:
        - o Professional conduct that promotes trust with internal and external contacts
        - o Adjusting own interpersonal communication style to meet the organisations cultural diversity and ethical environment.
      - Provide guidance, counselling and support to assist co-workers in resolving their work difficulties.
- Assessment Conditions – the assessment tool did not address the requirements of the assessment conditions of the unit in particular:
  - Interaction with others

### **UEE40411 Certificate IV in Electrical – Instrumentation**

UEENEE1150A Develop, enter and verify discrete control programs for programmable controllers

- The following evidence was reviewed:
  - o Master assessment tools
  - o Benchmarking
  - o Third party report
  - o Learner guides
  - o Cloud assess system

Evidence of non-compliant assessment practice includes:

- 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 and that the assessment was conducted in accordance with the Principles of Assessment and the Rules of Evidence. For example, but not limited to:

- AB
- LS
- BI
- The assessment tool is not a sufficient mechanism to ensure that all required knowledge and performance evidence of the unit of competency are being assessed and evidence gathered. For example, but not limited to:
  - The practical checklist states “Correctly handled unexpected situations by alerting the assessor”. However there is no information as to what actually happened or criteria defining acceptable performance. There is the ability to add assessor comments however nothing was provided.

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*Analysis of additional evidence*

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

**BSB51918 Diploma of Leadership and Management**

**UEE40411 Certificate IV in Electrical – Instrumentation**

The following additional evidence was reviewed:

Remedial action plan

**CHC30113 Certificate III in Early Childhood Education and Care**

CHCECE005 Provide care for babies and toddlers

- Master assessment tools
- RPL kit
- Gap assessment

**CHC50113 Diploma of Early Childhood Education and Care**

HLTAID004 Provide an emergency first aid response in an education and care setting

- Master assessment tools
- Gap assessment

**BSB51918 Diploma of Leadership and Management**

BSBLDR502 Lead and Manage effective workplace relationships

- Master assessment tools
- Third party report
- RPL kit
- Mapping

**UEE40411 Certificate IV in Electrical – Instrumentation**

UEENEE1150A Develop, enter and verify discrete control programs for programmable controllers

- Master assessment tools
- Gap assessment
- RPL kit

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

## Trainer and assessor competency

### Standards for RTOs Clause 1.17

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

Where the RTO, in delivering training and assessment, engages an individual who is not a trainer or assessor, the individual works under the supervision of a trainer and does not determine assessment outcomes.

### Standards for RTOs Clause 1.18

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

The RTO ensures that any individual working under the supervision of a trainer under Clause 1.17:

- a) holds the training and assessment credential specified in Item 6 of Schedule 1.
- b) has vocational competencies at least to the level being delivered and assessed; and
- c) has current industry skills directly relevant to the training and assessment being provided.

### Standards for RTOs Clause 1.20

*Original Finding: Not compliant*

*Finding following additional evidence: Compliant*

Without limiting Clauses 1.17 - 1.19, the RTO:

- a) determines and puts in place:
  - i) the level of the supervision required; and
  - ii) any requirements, conditions or restrictions considered necessary on the individual's involvement in the provision of training and collection of assessment evidence; and
- b) ensures that trainers providing supervision monitor and are accountable for all training provision and collection of assessment evidence by the individual under their supervision.

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

- The following evidence was reviewed:
  - Trainer and assessor files
- The organisation has not demonstrated that the below listed individual working under the supervision of a trainer possess credentials which meet the requirements of Clause 1.18(a):
  - Shahe-Rose Macci
- The organisation has not demonstrated that it has given sufficient consideration to the necessity of any conditions and/or restrictions regarding the supervisory arrangements for individuals who are not trainers or assessors. Specifically the organisation was unable to provide documentation regarding supervisory arrangements or monitoring procedures.

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### *Analysis of additional evidence*

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

- The following additional evidence was reviewed:
  - Shahe-Rose Macci's TAE40116 Certificate IV in Training and Assessment
  - Training under supervision template
  - Working under supervision policy and procedure
- The organisation has addressed the non-compliance for future students.
- The organisation has planned out sufficient remedial action to identify and address the impact the non-compliance may have caused students.

## Completion

### Standards for RTOs Clause 3.1

*Original Finding: **Not compliant***

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

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

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

**BSB51918 Diploma of Leadership and Management**

**UEE40411 Certificate IV in Electrical –Instrumentation**

- The following evidence was reviewed:
  - Assessment system as reported under Clause 1.8
  - Student data provided prior to the audit that identifies the students that have been issued AQF certification documentation
- The organisation has not demonstrated that its assessment system complies with the Principles of Assessment and Rules of Evidence (refer to non-compliance identified with Clause 1.8).
- The organisation has issued AQF certification documentation to students who have not met all requirements as specified in the relevant training package.

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### *Analysis of additional evidence*

**CHC30113 Certificate III in Early Childhood Education and Care**

**CHC50113 Diploma of Early Childhood Education and Care**

**BSB51918 Diploma of Leadership and Management**

**UEE40411 Certificate IV in Electrical –Instrumentation**

- The organisation has demonstrated compliance with clauses 1.8 resulting in Clause 3.1 becoming compliant.