



Australian Government

Australian Skills Quality Authority

# REPORT

## Audit report: Talon Education and Training Pty Ltd

Date/s of audit: 9 November 2017

Date report created: 20/11/2017

Date report updated: 24/01/2018

## Organisation details

Organisation's legal name:	Talon Education and Training Pty Ltd
Trading name/s:	Talon Education and Training Pty Ltd
RTO number:	41173
CRICOS number:	N/A

## Audit team

Lead auditor:	Mark Shrubshall
Assistant/s:	N/A

## Audit details

Application number/s:	N/A	
Audit number:	AUDREC0000807	
Audit reason	Post initial	
Address of site/s visited:	35 Jarrahdale Drive Elanora QLD 4221	
Date/s of audit:	9/11/2017	
Organisation's contact for audit:	Shane McAuley shane@talontraining.com.au	Chief Executive Officer 0420436475

## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Mark Shrubshall

Practice	Standards for RTOs 2015	Finding
Marketing/Recruitment	4.1	Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	Compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.2, 1.8	Not compliant
Completion	3.1	Not compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	Not audited

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 17/01/2018 : Compliant

Report completed by: Mark Shrubshall

Practice	Standards for RTOs 2015	Finding
Training and Assessment	1.2, 1.8,	Compliant
Completion	3.1	Compliant

## Background

Summary of RTO organisation and management structure:

- Chief Executive Officer/Trainer and assessor

Scope of RTOs registration:

- 30989QLD Course in Firearms Safety (approved for firearms licensing in Queensland)
- CPP20212 Certificate II in Security Operations
- CPP30411 Certificate III in Security Operations
- HLTAID001 Provide cardiopulmonary resuscitation
- HLTAID003 Provide first aid
- 10618NAT Course in Firearms Safety (approved for Firearms Licensing in Queensland)

Suburb and state of all delivery sites:

- Queensland - Gold coast and other areas in the state as required.

Third party usage:

- The organisation does not have any third party agreements for the delivery and assessment of its scope of registration only uses contract trainers and assessors

Core clients/target groups:

- People new to the security industry, existing employees upgrading licences and recertification.

Training Revenue (Funded or fee for service):

- Certificate three guarantee.
- Fee for service

Total number of current enrolments in RTO as at audit date:

- 15.

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 Talon Education and Training Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Talon Education and Training Pty Ltd
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Talon Education and Training Pty Ltd conducted on 8 & 9 November 2017.
- Other publically available information - including but not limited to, information published on the RTO's and third party websites.

## Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
<b>CPP20212</b>	Certificate II in Security Operations	Face to face	0
<b>CPP30411</b>	Certificate III in Security Operations	Face to face	15
<b>HLTAID003</b>	Provide first aid	Face to face	0
<b>10618NAT</b>	Course in Firearms Safety (Approved for firearms Licencing in Queensland)	Face to face	0

## Interviewees

Shane McAuley	Chief Executive Officer/ Trainer & Assessor	10618NAT, CPP20212, CPP30411, & HLTAID003
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## About this Report

This report details findings against the *Standards for Registered Training Organisations 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 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 RTO

Talon Education and Training Pty Ltd did not meet all requirements for Clauses 1.2, 1.8, 3.1

Remedial action is required for the following training products:

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

*CPPSEC2003B Work effectively in the security industry*

*CPPSEC2005A Work as part of a security team*

### **CPP30411 Certificate III in Security Operations**

*CPPSEC3002A Manage conflict through negotiation*

*CPPSEC3013A Control persons using empty hand techniques*

### **HLTAID003 Provide first aid**

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

#### Clause 1.2

- That each strategy identifies an amount of training to be provided to learners that is consistent with the requirements of the training product.

#### Clause 1.8

- The RTO 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 students that were assessed by your training provider in the past 6 months.

### Clause 3.1

- That 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 or VET accredited course.

## Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by Talon Education and Training Pty Ltd on 17/01/2018 the RTO:

- provided sufficient evidence to demonstrate compliance with clauses 1.2, 1.8 and 3.1

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

## Areas of non-compliance

### Marketing/Recruitment Practices

#### Clause 4.1

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.

### *Findings Compliant*

## Enrolment

### Clause 5.1

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.

### Clause 5.2

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.

**Findings: Compliant**

### Clause 5.3

Where the RTO collects fees from the individual learner, either directly or through a third party, the RTO provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying:

- a) all relevant fee information including:
  - i) fees that must be paid to the RTO; and
  - ii) payment terms and conditions including deposits and refunds;
- b) the learner's rights as a consumer, including but not limited to any statutory cooling-off period, if one applies;
- c) the learner's right to obtain a refund for services not provided by the RTO in the event the:
  - i) arrangement is terminated early; or
  - ii) the RTO fails to provide the agreed services.

**Findings: Compliant**

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**Clause 7.3**

Where the RTO requires, either directly or through a third party, a prospective or current learner to prepay fees in excess of a total of \$1500 (being the threshold prepaid fee amount), the RTO must meet the requirements set out in the Requirements for Fee Protection in Schedule 6.

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*Findings: Compliant*

## Support and Progression

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**Clause 1.7**

The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.

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*Findings: Compliant*

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## Training and Assessment

### Clause 1.1

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.

### Clause 1.2

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.

### **Findings: Non-compliant**

The following evidence was reviewed in relation to training and assessment:

- **CPP20212 Certificate II in Security Operations training and assessment strategy**
- **CPP30411 Certificate III in Security Operations training and assessment strategy**
  
- The organisation did not demonstrate that each strategy identifies an amount of training to be provided to learners that is consistent with the requirements of the training product

Evidence of non-compliant support and progression practices includes:

- The training and assessment strategy for the above qualifications identified the volume of learning as:
  - CPP20212 Certificate II in Security Operations - 108 hours (guided activities face to face 72 hours, self-directed 36 hours)
  - CPP30411 Certificate III in Security Operations (Licensing) - 132 hours (guided activities face to face 76 hours, self-directed 56 hours)
  - CPP30411 Certificate III in Security Operations (Functions) - 136 hours (guided activities face to face 80 hours, self-directed 56 hours).

The Australian Qualifications Framework volume of learning indicators identify that a Certificate II qualification is between 600-1200 hours and Certificate III qualification 1200 – 2400 hours.

The organisation stated that the strategies for the above courses in the face to face calculation include assessment and the subject matter is taught and assessed in the same lesson.

- The current training and assessment strategies for the above courses do not define the specific amount of training provided.
- It is not clear how the current strategy allows students the opportunity and the time to develop and practice knowledge and skills prior to assessment.

These practices and behaviours are non-compliant with clauses 1.2 of the *Standards for RTOs 2015*.

## Analysis of additional evidence

Evidence provided:

- Response to VET Final Report January 2018
- CPP20212 Certificate II in Security Operations training and assessment strategy ( New Entrants)

- CPP30411 Certificate III in Security Operations training and assessment strategy ( New Entrants)
- CPP30411 Certificate III in Security Operations training and assessment strategy ( Existing Workers)
- The organisation demonstrated that each strategy identifies an amount of training to be provided to learners that is consistent with the requirements of the training product.

#### **Clause 1.3**

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment;
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and
- d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.

**Findings: Compliant**

#### **Clause 1.8**

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.

**Findings: Non-compliant**

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

*CPPSEC2003B Work effectively in the security industry*

*CPPSEC2005A Work as part of a security team*

#### **CPP30411 Certificate III in Security Operations**

*CPPSEC3002A Manage conflict through negotiation*

*CPPSEC3013A Control persons using empty hand techniques*

The following evidence was reviewed in relation to training and assessment systems for the above qualifications/units:

- Completed student assessments (using past assessment system holistic) (multi choice, short answer, practical observation/roleplays)
- Training and assessment strategies
- Assessment tools (using current assessment system) (multi choice, short answer, practical observation/roleplays and case studies)
- Learner guide
- Assessor guide
- Benchmarking

#### **HLTAID003 Provide first aid**

The following evidence was reviewed in relation to training and assessment systems for the above unit:

- Completed student assessments(multi choice, short answer, practical observation)
- Benchmarking

The RTO's assessment practices are not compliant with the requirements of the *Standards for RTOs 2015* as:

- The organisation did not demonstrate (past practice) that it had implemented an assessment system that ensures that assessment:
  - a) Complies with the assessment requirements of the relevant training package
  - 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).

Evidence of non-compliance practices includes:

- It is noted that the current validated assessment tools being used, meet the requirements of the training package however, completed student assessment tools using past practices of holistic assessment identify that the assessment did not meet all the requirements of the training package for example but not limited to:

#### *CPPSEC2003B Work effectively in the security industry*

Required Knowledge

- Collection of evidence
- Records and reports which may be used for legal purposes

Required Skills

- Personal Skills to relate to people from a range of social, cultural and ethnic backgrounds and varying physical and mental abilities
- Self-reflection to identify skill improvement needs
- Use Business equipment and technology to (plan tasks and complete reports).

#### *CPPSEC2005A Work as part of a security team*

Required Skills

- Personal Skills to relate to people from a range of social, cultural and ethnic backgrounds and varying physical and mental abilities
- The assessment observation summary sheet identifies 3 opportunities for observations to have been conducted however; the completed student files show only one was completed.
- The assessor checklist for role plays 1, 2 & 3 (page 48) allows for only one observation to take place, furthermore it does not allow for the date to be included of when the observation took place.
- The assessor observation checklist identifies that verbal question were used and the responses were satisfactory however, the organisation was unable to provided evidence of the questions asked or the responses given.
- Students are advised in the holistic assessment that there are required to complete all units as it is a holistic assessment. The system used does not enable students that may not complete the course to be awarded a statement of attainment therefore students are disadvantaged.

#### *CPPSEC3002A Manage conflict through negotiation*

Required Skills

- *Communicate effectively with people from different social, cultural and ethnic backgrounds and of varying physical and mental abilities*

Required Knowledge

- *Indicators of neglect and abuse particularly in young people.*

### CPPSEC3013A Control persons using empty hand techniques

#### Required Knowledge

- Communicate effectively with people from different social, cultural and ethnic backgrounds and of varying physical and mental abilities
- The observation checklist for the 6 activities provides one column for the ticking off of the assessment criteria, it is not clear how or when the other 5 activities were assessed. The organisation stated that the students were observed over the 5 days and the checklist was a summary of what was seen.

Item 13 on the check list asks:

- Student created a sterile environment by
  - Using relevant PPE for infection control
  - Cordoning off crime scene
  - Removing dangerous substances

Completed student file shows a tick satisfactory however, the scenarios used do not allow for the student to demonstrate the requirements. It is not clear what was observed and therefore the reliability of the assessment is called into question.

#### Required Knowledge

- Communication techniques codes and signals
- Emergency and evacuation procedures and instructions
- Principles of effective communication including interpersonal techniques
- Critical aspects of Evidence
- Using effective communication techniques to provide warnings and clear directions to subject, and conduct basic negotiation to defuse conflict in a manner which engages minority groups.

### HLTAID003 Provide first aid

- It was not clear how the assessment tool meets all the requirements of the training package in particular:

#### Required Knowledge

- Needle stick injuries.

It is noted that the organisation amended the assessment tool at audit in relation to Needle stick injuries.

This has rectified the tool for the future students however, it does not rectify past practices

#### Student files

- Completed student files reviewed above identified that the all passed the course however See Foong Tang-Hauk (Yvonne) had 5 questions out of 92 questions in total marked incorrect. When questioned the organisation stated that they thought a 75% pass mark was standard.
- The organisation also stated that they believed there was a small number of other past students outside of the selected ones that may have been marked incorrect on some questions and been passed.

These practices and behaviours are non-compliant with clause 1.8 of the *Standards for RTOs 2015*

## Analysis of additional evidence

#### Evidence provided:

- Talon Education and Training letter to students dated 27/11/2017 offering gap training free of charge
- Talon Education and Training letter to students dated 19/12/2017 encouraging students to register for free gap training

- Students completed gap training list
- Example email to student re HLTAID003 Provide first aid
- Assessment Tools CPPSEC2003B, CPPSEC2005A
- Assessment Tools CPPSEC3002A, CPPSEC3013A
- HLTAID003 completed student gap assessments
- CPPSEC302A, CPPSEC3013A Completed student gap training assessment tools
- CPPSEC2003B, CPPSEC2005A Completed student gap training assessment tools
- Assessment gap role play assessment CPPSEC3002A, CPPSEC3013A CPPSEC2005A

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

#### **CPP30411 Certificate III in Security Operations**

#### ***HLTAID003 Provide first aid***

- The RTO demonstrated that it has plan/process that it has implemented to carry out remedial action to identify and address the impact the non-compliances may have caused to students in the training products sampled.

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#### **Clause 1.13**

In addition to the requirements specified in [Clause 1.14](#) and [Clause 1.15](#), the RTO's training and assessment is delivered only by persons who have:

- a) vocational competencies at least to the level being delivered and assessed;
- b) current industry skills directly relevant to the training and assessment being provided; and
- c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

#### **Clause 1.14**

The RTO's training and assessment is delivered only by persons who have:

- a) ~~prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1, or demonstrated equivalence of competencies; and~~
- b) from 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1.

#### **Clause 1.15**

Where a person conducts assessment only, the RTO ensures that the person has:

- a) ~~prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1, or demonstrated equivalence of competencies; and~~
- b) from 1 January 2016, Item 1 or Item 2 or Item 3 of Schedule 1.

#### **Clause 1.16**

The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

***Findings: Compliant***

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## **Completion**

#### **Clause 3.1**

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.

**Findings: Non-compliant**

**CPP20212 Certificate II in Security Operations**

**CPP30411 Certificate III in security Operations**

**HLTAID003 Provide first aid**

The RTO's completion practices are not compliant with the requirements of the *Standards for RTOs 2015* as:

- The organisation did not demonstrate that 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 or VET accredited course.

Evidence of non-compliance practices includes:

- As non-compliance was identified with the assessment requirements of Clause 1.8 with regard to completed candidate assessments, the RTO has not ensured its learners have addressed the requirements of the training product as specified in the relevant training package.

These practices and behaviours are non-compliant with clause 3.1 of the *Standards for RTOs 2015*

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## Analysis of additional evidence

Evidence provided:

- HLTAID003 completed student gap assessments
- CPPSEC302A, CPPSEC3013A Completed student gap training assessment tools
- CPPSEC2003B, CPPSEC2005A Completed student gap training assessment tools
- Students completed gap training list
- Trainer induction , Hone Waipouri
- VET PD Certificate from RTO Skills and Consulting for Shane McAuley

**CPP20212 Certificate II in Security Operations**

**CPP30411 Certificate III in security Operations**

**HLTAID003 Provide first aid**

- The RTO demonstrated that 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 or VET accredited course.