



**Australian Government**  
**Australian Skills Quality Authority**

# REPORT

## **Audit report: CJAE Pty Ltd**

Date/s of audit: 7 March 2019

Date report created: 29 April 2019



## Organisation details

Organisation's legal name:	CJAE Pty Ltd
Trading name/s:	Angel Institute of Education
RTO number:	22115
CRICOS number:	N/A

## Audit team

Lead auditor:	Terence Bowden
Auditor:	Paul Bunce

## Audit details

Application number/s:	ADDVET0030329 and ADDVET0030330	
Audit number:	AUDREC0009169 and AUDREC0009170	
Audit reason	Compliance - monitoring	
Address of site/s visited:	Unit 3 62 Robinson Street Dandenong VIC 3175	
Date/s of audit:	7 March 2019	
Organisation's contact for audit:	Mr. Zeeshan Nasir info@angelinstitute.com.au	Chief Executive Officer (03) 9792 5259

## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Terence Bowden

Practice	Standards for RTOs	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	1.1, 1.2, 1.3, 1.8, 1.13-1.18, 1.20	Compliant
Training and Assessment	1.1, 1.3, 1.8	Not compliant
Completion	3.1	Compliant
Regulatory Compliance / Governance	2.3, 8.2	Compliant
Regulatory Compliance / Governance	2.4	Not compliant

## Background

Summary of organisation and management structure:

CJAE Pty Ltd, trading as Angel Institute of Education, has been registered since 1 July 2008. The owner and Chief Executive Officer (CEO) is Mr Zeeshan Nasir. An operations coordinator and a small team of administrative officers assist the CEO. The CEO recruits trainers as required and, at the time of audit, three trainers were nominated as course coordinators. Training and assessment services are delivered at multiple sites across the Melbourne metropolitan area and these activities are managed on a day-to-day basis by the operations coordinator.

Scope of registration:

- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC33015 Certificate III in Individual Support*
- *CHC50113 Diploma of Early Childhood Education and Care*
- *SHB20216 Certificate II in Salon Assistant*
- *SHB30416 Certificate III in Hairdressing*
- *22250VIC Certificate I in EAL (Access) (superseded)*
- *22251VIC Certificate II in EAL (Access) (superseded)*
- *22255VIC Certificate III in EAL (Access) (superseded).*

Suburb and state of all delivery locations:

- Unit 3 62 Robinson Street, Dandenong
- Canterbury International Hotel. 3-6 Canterbury Road, Forest Hill
- Centre 2 Snughburgh Way, Epping
- Waverly Hotel. 301 Springvale Road, Glen Waverley
- 1/6-7 Princess Street, St Albans
- 10-12 Ruthven Crescent, Lalor
- 16/87 Hallam South Road, Hallam
- 4/196 Settlement Road, Thomastown
- 2/85, Hume Highway, Somerton
- 309A Main Road East, St Albans
- Corner Bogong Avenue and Kingsway Avenue, Glen Waverley.

Third party usage:

- Recruitment brokers source approximately fifty percent of candidates for enrolment.

Core clients/target groups:

- Primarily domestic students eligible for Victorian government funded training (Skills First).

Training Revenue (Funded or fee for service):

- Revenue is from Skills First and fee-for-service activities.

Total number of current enrolments as at audit date:

- 95 (in sampled qualifications).

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 CJAE Pty Ltd to ASQA
- existing information and records held by ASQA concerning CJAE Pty Ltd
- information provided to ASQA's auditors and documentation reviewed during the site audit of CJAE Pty Ltd conducted on 7 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
22251VIC	<i>Certificate II in EAL (Access)</i>	Face to face	12
SHB30416	<i>Certificate III in Hairdressing</i>	Face to face	20
CHC50113	<i>Diploma of Early Childhood Education and Care</i>	Face to face	63

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

## Interviewees

Name	Position	Training products
Zeeshan Nasir	CEO	All
Saad Hanif	Operations Manager	All

## About this Report

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

## Action required by organisation

CJAE Pty Ltd did not meet all requirements for Clauses; 1.1, 1.2, 1.3, 1.8 and 2.4.

Remedial action is required for the following training products:

- *CHC50113 Diploma of Early Childhood Education and Care*
- *SHB30416 Certificate III in Hairdressing*
- *22251VIC Certificate II in EAL (Access) (superseded)*

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

### Training Delivery and Assessment:

Clauses 1.1 and 1.2

- the organisation's training and assessment strategy documents include sufficient detailed information to ensure that when implemented all requirements of the training product are satisfied.

Clause 1.3

- the organisation assesses all training facilities for adequacy and suitability to deliver specific training products for specific numbers of students
- the organisation systematically monitors the ongoing adequacy and suitability of its remote training at all training facilities
- the organisation maintains detailed timetables of current and scheduled training activities at all training locations
- the organisation management systems can demonstrate, on demand, that the organisation has provided sufficient training resources to trainers and learning resources for students, at all training locations.

Clause 1.8

- the organisation has corrected its assessment system to ensure all assessments are conducted in accordance with the Principles of Assessment and the Rules of Evidence
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all scope items that were assessed in a manner that did not meet the requirements of Clause 1.8.

### Regulatory Compliance / Governance:

Clause 2.4

- the organisation systematically monitors services provided by a third party to ensure that third party practices comply with the Standards for RTOs.

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

**Original Finding: Not 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**

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.

*CHC50113 Diploma of Early Childhood Education and Care*  
*SHB30416 Certificate III in Hairdressing*  
*22251VIC Certificate II in EAL (Access) (superseded)*

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

- training and assessment strategy documents for sample qualifications
- student management system records – sample of students
- timetables – sample of qualifications and locations
- facility hire agreements – sample of four
- discussion with CEO and operations manager during audit.

The organisation's training and assessment strategy and practices are not compliant with the requirements of Clauses 1.1 and 1.2 of the Standards for RTOs as the documented strategies do not include sufficient detailed information to ensure operational practice is consistent with the all requirements of the training products being delivered.

The organisation's training operations are decentralised. Training and assessment services are delivered at various locations, currently across the Melbourne metropolitan area, by trainers contracted on an as-needed basis. The number and locations of training facilities change over time as the number and location of students change. Records indicate that student enrolments have ranged from 100 to 900. Contracted trainers operate autonomously and the organisation provides the training and assessment strategy documents to trainers as the source of operational direction and instruction.

The training and assessment strategy documents are not fit for this purpose, as they do not include sufficient detailed information to ensure operational practice is consistent with the all requirements of the training products being delivered, for example, but not limited to:

- the strategy document for *CHC50113 Diploma of Early Childhood Education and Care* does not include detailed information about how the essential work placement arrangements are organised for each student at conveniently located workplaces. The document does not specify the trainers' role in the coordination of training and assessment activities required during the placement.
- the strategy documents do not include adequate information about how the organisation's pre-training interviews, language literacy and numeracy assessment, and individual training plans are managed and coordinated, at remote locations.

- the strategy documents do not include operational information to effectively monitor and manage student attendance, course progress, and support intervention, through its decentralised operational network.

The non-compliance identified with Clauses 1.1 and 1.2 are associated with, and contribute to, non-compliance identified with Clause 1.3, outlined below.

### Standards for RTOs Clause 1.3

**Original Finding: *Not compliant***

**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.**

*CHC50113 Diploma of Early Childhood Education and Care*  
*SHB30416 Certificate III in Hairdressing*  
*22251VIC Certificate II in EAL (Access) (superseded)*

The following was reviewed in relation to the sufficiency of resources to deliver training products in accordance with the organisation's training and assessment strategies:

- training and assessment strategy documents for sample qualifications
- student management system records – sample of 15 students
- timetables – sample of qualifications and locations
- facility hire agreements – sample of four agreements
- discussion with CEO and operations manager during audit
- site inspection at Unit 3, 62 Robinson Street, Dandenong
- student enrolment data provided prior to audit.

The organisation's resourcing practices are not compliant with the requirements of Clause 1.3 of the Standards for RTOs as it did not demonstrate that it ensured its training facilities at all locations were suitable and adequate.

For example, there was no evidence to demonstrate that the organisation had:

- assessed potential training facilities in terms of adequacy and suitability to deliver specific training products for specific numbers of students
- systematically monitored the ongoing adequacy and suitability of its remote training facilities
- the capability to readily produce detailed timetables of current and scheduled training activities at each of its training locations
- adequate management systems in place to ensure it provided sufficient training resources to trainers, and learning resources for students at all remote training locations

### Standards for RTOs Clause 1.8

**Original Finding: *Not compliant***

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

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

Table 1.8.1 Principles of Assessment

Fairness	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.</p>
Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none"> <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	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none"> <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	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>
Table 1.8.2 Rules of Evidence	
Validity	<p>The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.</p>
Sufficiency	<p>The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.</p>
Authenticity	<p>The assessor is assured that the evidence presented for assessment is the learner's own work.</p>
Currency	<p>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.</p>

CHC50113 Diploma of Early Childhood Education and Care  
 SHB30416 Certificate III in Hairdressing  
 22251VIC Certificate II in EAL (Access) (superseded)

The following evidence was reviewed in relation to the organisation's assessment system:

- student management system records – sample of 15 students
- assessment tools for a sample of competency units:
  - HLTAID004 Provide an emergency first aid response in an education and care setting
  - CHCECE003 Provide care for children
  - CHCECE017 Foster the Holistic development and wellbeing of the child in early childhood
  - CHCECE024 Design and implement the curriculum to foster children's learning and development
- Student assessment records - IDs 01287, 02262, 02543, 02181, 02209, 02621, 02266.



The organisation's assessment 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 for the qualification identified above and provide evidence:

- of a revised assessment system for the qualifications listed above that addresses all requirements of Clause 1.8
- that confirms students were assessed as meeting all the requirements of the training products in which they were enrolled.

Evidence of non-compliant assessment practice includes:

- *Validity and Sufficiency: For HLTAID004 Provide an emergency first aid response in an education and care setting*, the training package requires that students respond appropriately in the event of regurgitation or vomiting, and followed a single rescue procedure, including the demonstration of a rotation of operators with minimal interruptions to compressions.

The assessment evidence reviewed on a sampled student file did not demonstrate that the above had been assessed. For example, but not limited to: Student 02266.

## Regulatory Compliance / Governance

### Third parties (including education agents)

#### Standards for RTOs Clause 2.4

**Original Finding: *Not compliant***

**The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and use these to ensure that the services delivered comply with these Standards at all times.**

The following was reviewed in relation to third parties:

- Broker/Agent agreements
- sample of minutes of meetings between the organisation and brokers
- the organisation's website: [www.angelinstitute.com.au](http://www.angelinstitute.com.au)
- discussion with CEO and operations manager during audit.

The organisation's management of third parties is not compliant with the requirements of Clause 2.4 of the Standards for RTOs as the organisation does not systematically monitor third party practices.

Evidence of non-compliant third party management practice includes:

- the broker/agent agreement does not specify:
  - recruitment activities to be undertaken. At audit, the organisation could not describe how each agent actually went about their recruitment.
  - requirements for ethical practices.
- the organisation does not have a documented system in place:
  - to engage brokers
  - to monitor broker activities.