



Training Accreditation Council
WESTERN AUSTRALIA

Strategic Industry Audit Stage 1 Report

2012-2013 Strategic Industry Audit of
Aged Care and Home and Community Care
qualifications in Western Australia

www.tac.wa.gov.au

The Training Accreditation Council (TAC) has conducted a Strategic Industry Audit into the delivery of nationally recognised qualifications in the Aged Care and Home and Community Care sector in Western Australia. The outcomes of the audits, including key findings and recommendations, are contained within this report.

2012-2013 Strategic Industry Audit of Aged Care and Home and Community Care qualifications in Western Australia

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Acronyms

ABS	Australian Bureau of Statistics
AQF	Australian Qualifications Framework
AQTF	Australian Quality Training Framework
ASQA	Australian Skills Quality Authority
CACP	Community Aged Care Package
CALD	Culturally and Linguistically Diverse
CD	Classroom Delivery
CEO	Chief Executive Officer
CSandHISC	Community Services and Health Industry Skills Council
DoHA	Department of Health and Ageing
DTWD	Department of Training and Workforce Development
EACH	Extended Aged Care at Home
EACHD	Extended Aged Care at Home Dementia
HACC	Home and Community Care
ISC	Industry Skills Council
LLN	Language, literacy and numeracy
NRCP	National Respite for Carers Program
NSSC	National Skills Standards Council
RPL	Recognition of Prior Learning
RTO	Registered Training Organisation
SIA	Strategic Industry Audit
TAC	Training Accreditation Council (of Western Australia)
VET	Vocational Education and Training
WAAF	WA Assessment Framework
WA	Western Australia
WP	Work Placement

Acknowledgement

The Training Accreditation Council (TAC) would like to thank and acknowledge the Reference Group members, the industry advisors and the RTOs for their participation and assistance in the Strategic Industry Audit.

Executive Summary

Background and scope of audit

The Training Accreditation Council (TAC or the Council) is an independent statutory body established under the Vocational Education and Training Act 1996 that provides the quality assurance and recognition processes for vocational education and training (VET) in Western Australia.

The Council conducts a range of audits of Registered Training Organisations (RTOs) to ensure on-going compliance with the Australian Quality Training Framework (AQTF) Essential Conditions and Standards for Continuing Registration. A strategic industry audit (SIA) is conducted to confirm that an RTOs training and assessment services are meeting the requirements of the AQTF and the particular industry or licensing authority.

In February 2012 the Council endorsed a SIA of Aged Care and Home and Community Care qualifications in WA to be conducted during 2012-13. The SIA was initiated in response to concerns by industry about the quality of nationally recognised vocational education and training being delivered in WA by RTOs. The concerns included those raised by the Australian Government's Productivity Commission Inquiry Report "Caring for Older Australians", released in August 2011 regarding the variable quality of training and assessment in the aged and community care industry.

The objectives of the SIA were to:

1. determine the level of compliance with the AQTF Essential Conditions and Standards for Continuing Registration of RTOs delivering nationally recognised Aged Care and Home and Community Care qualifications;
2. identify and analyse key areas of compliance and non-compliance with the AQTF Essential Conditions and Standards for Continuing Registration for RTOs delivering the above qualifications;
3. identify key issues impacting on training and assessment outcomes and good training and assessment practice in the Aged and Community Care sector;
4. comment on whether there are systemic issues which impact on the delivery of training and assessment services for qualifications in the Aged and Community Care sector; and
5. recommend strategies to address key issues and to improve the quality of training and assessment for qualifications in this industry area and future audit processes.

The SIA focussed on delivery and assessment in Western Australia of the four (4) qualifications listed below from the Community Services Training Package qualifications delivered in WA.

- CHC30208/CHC30212 Certificate III in Aged Care.
- CHC40108 Certificate IV in Aged Care.
- CHC30308/CHC30312 Certificate III in Home and Community Care.
- CHC40208/CHC40212 Certificate IV in Home and Community Care.

In addition, it was agreed that the audit would focus on general concern to the local industry which included:

- short duration of classroom training;
- simulation of delivery and assessments;
- work placements, on-the-job experience and work-based assessments; and
- language, literacy and numeracy support.

Audit outcomes and findings for TAC registered RTOs

The outcomes and key findings of the audit support industry and the Productivity Commission's concerns about the quality of training and assessment. The RTOs delivering in the Aged Care and Home and Community Care Sector can be broadly split into two (2) categories: those that demonstrated a high level of compliance with the AQTF standards and were found to have a range of good practice in place and those that were operating in significant non-compliance with the AQTF Standards to the extent where there were major concerns that training and assessment systems were not sufficiently focussed on quality training and assessment outcomes.

Impact of audit

The conduct of the strategic industry audit resulted in 29% of RTOs identified in the original audit sample ceasing to provide training in the Aged Care and Home and Community Care industry.

Of the original 22 TAC registered RTOs identified through the audit sample six (6) are no longer operating in the areas of aged care and home and community care.

- 2 (9%) RTOs removed the nominated qualifications from their scope of registration following notification of their inclusion in the audit sample.
- 1 (5%) RTO voluntary relinquished its RTO registration prior to commencement of the site audits.
- 1 (5%) RTO that had been found significantly non-compliant at audit and subsequently had demonstrated compliance with the AQTF, voluntary relinquished their RTO registration, indicating that their training was no longer financially viable.
- 1 (5%) RTO that had been found critically non-compliant removed the nominated qualifications from their scope within the 20 day rectification period.
- 1 (5%) RTO that had been found significantly non-compliant had their registration cancelled by the Council.

Key findings of AQTF Compliance

The audit has gone some way to improving the quality of training and assessment in the Aged Care and Home and Community Care Training Sector as all providers have been required to amend their delivery and assessment to meet the requirements of the training package and the AQTF Standards in order to continue to be registered as an RTO.

Overall, the SIA found that there was a high level of non-compliance with the AQTF Essential Conditions and Standards for Continuing Registration with over 50% of RTOs found to have either significant or critical levels of non-compliance.

Of the 19 TAC registered RTOs:

- 2 (11%) were found to be fully compliant at the time of audit;
- 7 (36%) had minor non-compliances;
- 8 (42%) had significant non-compliances; and
- 2 (11%) were found to have critical non-compliances.

The highest levels of non-compliance within the standards related to the following:

- **68% of RTOs (13) audited were non-compliant with the requirement that Assessment including Recognition of Prior Learning (RPL) is conducted in accordance with the principles of assessment and the rules of evidence;**
- **63% of RTOs (12) audited were non-compliant with the requirement that staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies; and**
- **47% of RTOs (9) audited were non-compliant with the requirement that Training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed.**

TAC processes allow for RTOs that are found non-compliant against the AQTF Essential Conditions and Standard for Continuing Registration at audit to provide additional evidence within a specified timeframe, 20 working days after receipt of the audit report, in order to demonstrate compliance. All RTOs deemed non-compliant that remain registered with the TAC were able to demonstrate compliance.

Issues with Assessment and Vocational Currency

The level of non-compliance with assessment requirements indicates that systemic issues with assessment exist within the Aged and Community Care training sector. In conjunction with the high number of RTOs that were not able to demonstrate vocational competency of their nominated trainers and assessors, there is a significant risk that learners are not actually achieving the competency as specified in the qualifications.

The SIA found, that at the time of the initial audit, a significant number of RTOs did not have in place the assessment tools or strategies to satisfy TAC that assessments were valid or that competencies were assessed reliably, consistently or in accordance with the requirements specified in the units of competency. This supports the Productivity Commission's concerns about the variable outputs in Aged Care training.

The majority of non-compliances related to assessments not meeting the rules of evidence including validity, sufficiency and authenticity. Assessments that are not valid or reliable indicate that the assessment tools used are not actually assessing the intended outcomes of the unit of competency. Participants do not therefore have the skills and knowledge deemed necessary by industry to undertake the occupations covered by the SIA.

The high level of non-compliance found with the assessment standards indicates that it is not only how assessment is conducted that has an impact on non-compliance, but that the materials and equipment used for both training and assessment are contributory factors.

The National Skills Standards Council (NSSC) Standards Policy Framework "Improving Vocational Education and Training – The Australian Vocational Qualifications System", proposes that minimum changes are required to the Standards relating to assessment. Based on the findings of the SIA, the current RTO Standards do not provide a level of clarity for RTOs on the aspects of the training package that must be complied with and Training Package requirements do not provide regulators with the scope to appropriately assess all dimensions of the quality of assessment.

The Productivity Commission's concerns about the procedures to ensure that VET trainers and assessors possess required current practice knowledge are well founded, with nine (9) RTOs audited not being able to demonstrate how the vocational competency of its nominated trainers and assessors had been established. The audit reports indicated that there was no evidence of systematic processes to determine how trainers demonstrated the vocational competency for the qualification they were delivering, the trainer held superseded versions of the qualification, or the matrix the RTO was using to demonstrate equivalence did not have sufficient information.

Other factors influencing the quality of delivery and assessment

Assessment competence of trainers and assessors

The high level of compliance by RTOs with the requirements for training and assessment to be delivered by trainers and assessors who have the necessary training and assessment competencies as determined by the National Quality Council (NQC) or its successors, did not positively correlate to a high level of compliance with assessment requirements. Reports from the audits undertaken consistently identified that trainer and assessors were not applying the principles of assessment or rules of evidence when undertaking assessments.

The audit findings and the ability of many RTOs to address the non-compliances within a short period of time indicates that in some cases the trainers and assessors were not able to demonstrate appropriate skills in training and assessment and in others, the skills were held but not being applied by the trainers and assessors. The audit findings and interviews with RTOs indicated that increased pressure by industry to deliver in reduced timeframes and cut costs to make training attractive to students were contributing factors to the RTO failing to operate in compliance with the standards.

This finding raises potential issues relating to the suitability and quality of delivery of the TAE40110 Certificate IV in Training and Assessment (TAE) as the minimum qualification to be held by trainers and assessors and requires further investigation.

Duration

The audit highlighted that a significant level of non-compliance was found in RTOs delivering the Certificate III in Aged Care within a short duration; however significant levels of non-compliance were not restricted to RTOs delivering in short durations.

The SIA found that significant or critical levels of non-compliance were not exclusively attributed to a particular duration of training however it was a contributing factor. In many cases, the audit highlighted that non-compliances with the assessment standards were directly attributed to insufficient time being provided to the assessor to undertake assessment regardless of the duration of the course.

A review of the data on course duration was undertaken and highlighted a significant level of non-compliance found in RTOs delivering the Certificate III in Aged Care within a short duration. In addition the employer survey confirmed widely held views that shorter training timeframes made adequate training and assessment more difficult and there was a high level of concern that lower quality outcomes were achieved.

One (1) RTO was able to demonstrate that they were fully compliant with the AQTF when delivered in a period of less than three (3) months. This demonstrated that the qualification could be adequately delivered and assessed within the short timeframe in a high resource delivery mode.

The current Standards for RTOs make the assessment of non-compliance due to insufficient timeframes difficult within a competency based assessment framework. To address the issue of short duration courses within the competency based assessment framework, the NSSC may wish to investigate the alignment of specific requirements within the Standards for RTOs that explicitly require RTOs to demonstrate how timeframes for assessment are able to meet the needs of the individual client group.

Simulation

The SIA did not find that simulation of assessment alone was an issue that was related to non-compliance with standards relating to assessment.

The Reference Group was concerned that anecdotal information had suggested that participants in aged and community care training were ill prepared for workplace duties due to crucial activities such as handling of patients being undertaken by simulation. While significant issues with assessment were identified, the SIA did not find that simulation of assessment alone was an issue that was related to non-compliance with standards relating to assessment. No RTOs in the audit sample were reported as using only simulated assessment but a combination of simulation and on the job assessment.

It is likely that concerns raised about assessment in a simulated environment relate more directly to the outcomes that are experienced when the student has not been assessed appropriately, regardless of the assessment environment. This was highlighted throughout the audit.

Requirements within the qualifications in most cases do not mandate where assessment takes place but use terms such as “most appropriate” and “it is recommended”. For the majority of units, the words “must be assessed” are not used. Auditors are therefore only able to make a judgement about whether the assessments met the requirements of the AQTF with the issue of appropriateness of simulation as an assessment practice being outside the scope of the audit.

Additional focus on mandated assessment in the workplace in the training package and the inclusion of mandatory work placement requirements in the new version of the qualifications will go some way to alleviating concerns regarding the use of simulated environments.

Work placements and on-the-job experience

The audit found that the need for mandatory requirements for work placement was strongly supported.

All RTOs audited were providing opportunities for work placements, whether organised by the RTO or the learner themselves. However, the four (4) qualification descriptors for the courses that formed part of the audit did not provide parameters or standards in relation to workplace experience which could be used as benchmarks for auditors.

The need for mandatory requirements for work placement was strongly supported through the discussions with employers and the employer survey and was a key issue raised in the Productivity Commission report.

The Community Services and Health Industry Skills Council (CSandHISC) is currently reviewing and streamlining the Community Services Training Package, which includes the Aged Care and Home and Community Care qualifications and has released the first draft qualifications for comment. The qualifications within this package that are currently being re-developed now have a specified duration for work experience built into specific units. The TAC considers that further detail needs to be provided on the structure of the work placement and how it will contribute to student learning otherwise the benefits of the mandatory inclusion may be lost.

Language, literacy and numeracy (LLN)

Given the high percentage of RTOs that have been found non –compliant with being able to demonstrate how the required skills and knowledge are assessed it is probable that deficiencies with assessment are a contributing factor to employers experiencing variable levels of LLN skills in the workplace by recent graduates.

Both the Reference Group and the responses to the employer survey raised concerns that language, literacy and numeracy skills of workers in the Aged Care industry were in many cases not adequate to meet professional standards. Required language levels are not assigned for the qualifications audited. However, language, literacy and numeracy are essential skills that underpin many of the units in the four (4) qualifications audited. As essential skills are required to be assessed as part of the overall assessment strategy it could be inferred that a lack of overall quality in assessment leads to the question of whether these skills are being adequately assessed.

Recommendations

The following recommendations are proposed to address the key findings and areas of concerns identified in the 2012–2013 Strategic Industry Audit of Aged Care and Home and Community Care qualifications in Western Australia.

Recommendation 1

The TAC to undertake monitoring audits within six (6) months of all RTOs that were found to have significant or critical non-compliances in the strategic industry audit. These audits will focus on assessment and implementation of rectification actions.

Recommendation 2

The TAC to ensure that RTOs audited for the current or revised Aged Care and/or Home and Community Care qualifications, including all new applications, be subject to a site audit, with industry advisors in attendance where possible.

Recommendation 3

The TAC to develop formal arrangements with peak industry bodies in the Aged and Community Care sector for the ongoing provision of industry advisors for AQTF audits in this industry.

Recommendation 4

The TAC to request the Community Services, Health and Education Industry Training Council to investigate and develop standards/criteria relating to the organisation of work placements for students and RTOs with respect to the Aged Care and Home and Community Care qualifications.

Recommendation 5

The TAC to provide the Stage 1 findings of the SIA report to the Community Services and Health Industry Skills Council for consideration in the current review of the national training package, highlighting the following points.

- The draft Certificate III in Individual Support Work incorporates the requirement for a minimum of 120 hours of “direct client contact work”, there remains however, ambiguity in what “direct client contact work” means. If there is no further detail provided on the structure of the work placement and how it will contribute to student learning the benefits of the mandatory inclusion may be lost.
- The connection between where assessment takes place and the validity of the actual assessment needs to be determined when requirements for these qualifications are being determined for specification within assessment requirements of units of competency.
- Further assessment of the cost and appropriate duration required for qualifications in the Aged and Community Care sector and the ability of industry and employees to pay for the level of training prescribed.

Recommendation 6

The TAC to forward the findings from the Strategic Industry Audit of Aged Care and Home and Community Care qualifications in Western Australia, Interim Report to the NSSC, to inform the development and implementation of the standards applying to vocational education and training.

It is recommended that the NSSC give consideration to:

- providing a level of clarity for RTOs in the RTO Standards on the aspects of the training package that must be complied;
- ensuring that through the quality assurance process; the level of detail regarding assessment requirements provide regulators with the scope to appropriately assess all dimensions of the quality of assessment;
- address the issue of short duration courses within the competency based assessment framework by investigating the inclusion of a requirement for RTOs to explicitly demonstrate how timeframes for assessment are able to meet the needs of the individual client group; and

- undertaking further evaluation, in conjunction with Innovation and Business Skills Australia (IBSA) of the appropriateness of the mandatory units of the TAE40110 to ensure assessors have the required competency to undertake quality assessment.

1. Introduction

The TAC or the Council is an independent statutory body established under the *Vocational Education and Training Act 1996* that provides the quality assurance and recognition processes for vocational education and training (VET) in Western Australia. The Council operates within the National Skills Framework and is the WA Registering Body and Course Accrediting Body under the Australian Quality Training Framework (AQTF). The AQTF provides a national set of standards which assures nationally consistent, high-quality training and assessment services for the clients of Australia's vocational education and training system.

1.1 Background to the Strategic Industry Audit

The Council conducts a range of audits of Registered Training Organisations (RTOs) to ensure on-going compliance with the AQTF Essential Conditions and Standards for Continuing Registration. A strategic industry audit (SIA) is conducted to confirm that RTOs training and assessment services are meeting the requirements of the AQTF and the particular industry or licensing authority.

In February 2012 the Council endorsed an SIA of Aged Care and Home and Community Care qualifications in WA to be conducted during 2012-13. The SIA was initiated in response to concerns by industry about the quality of nationally recognised vocational education and training being delivered in WA by RTOs.

Concerns were also raised about the variable quality of training and assessment in the aged and community care industry in the Australian Government's Productivity Commission Inquiry Report "Caring for Older Australians"¹, released in August 2011. The Commission's report proposed that, due to growing concerns about the quality of training in aged care, there needed to be an independent review of the outcomes of aged care training in order to ensure that appropriate minimum standards are applied and that students demonstrate appropriate competencies.

The report offered proposals to address the weaknesses and aim for the delivery of higher-quality care. One (1) of the recommendations was pertinent to the functions of the TAC and was one of the reasons for the SIA.

Recommendation 14.4

Given industry concerns about the variability in training outcomes for students, the Australian Government should undertake an independent and comprehensive review of aged care-related vocational education and training (VET) courses and their delivery by registered training organisations (RTOs). Among other things, the review should consider:

- *examining current practices that may be leading to variability in student outcomes, including periods of training and practicum*
- *reviewing procedures to ensure that VET trainers and assessors possess required current practice knowledge*
- *identifying whether regulators are adequately resourced to monitor and audit RTOs using a risk-based regulatory approach and have appropriate enforcement regimes that allow for appropriate and proportional responses to non-compliance by RTOs*
- *identifying reforms to ensure students demonstrate pertinent competencies on a more consistent basis.*

¹ Productivity Commission's "Caring for Older Australians", dated 28 June 2011
<http://www.pc.gov.au/projects/inquiry/aged-care/report>

The **objectives** of the SIA were to:

1. determine the level of compliance with the Australian Quality Training Framework (AQTF) Essential Conditions and Standards for Continuing Registration of RTOs delivering nationally recognised Aged Care and Home and Community Care qualifications;
2. identify and analyse key areas of compliance and non-compliance with the AQTF Essential Conditions and Standards for Continuing Registration for RTOs delivering the above qualifications;
3. identify key issues impacting on training and assessment outcomes and good training and assessment practice in the Aged and Community Care sector;
4. comment on whether there are systemic issues which impact on the delivery of training and assessment services for qualifications in the Aged and Community Care sector; and
5. recommend strategies to address key issues and to improve the quality of training and assessment for qualifications in this industry area and future audit processes.

The desired outcomes of the SIA for this strategic industry audit were:

- to comment on the relationship between concerns about the quality of vocational education and training in the aged care sector and the Australian standards (AQTF) for delivery of these qualifications; and
- to recommend strategies to increase confidence in the quality assurance of the delivery and assessment of nationally recognised training for Aged Care and Home and Community Care qualifications in Western Australia.

The SIA was designed to consider the Productivity Commission's comments on the quality of training and examine whether they related to compliance with the AQTF. The audit did not investigate the workplace performance issues of graduates of the above courses.

1.2 Reference Group

A Reference Group was established to support the SIA. The group comprised representatives from the Community Services, Health and Education Training Council, employer and industry stakeholder groups, the Aged Care Standards and Accreditation Agency, employers, the Department of Training and Workforce Development (DTWD) (ApprentiCentre), the Australian Skills Quality Authority and the TAC Secretariat.

The role and membership of the Reference Group is provided at **Appendix A**.

Reference Group members brought industry expertise on specific industry and licensing requirements, and a strong understanding of the qualifications, the industry, regulatory requirements and issues impacting on the industry. The Reference Group provided input into the priorities, scope and audit approach. The Reference Group also reviewed and endorsed the draft report and recommendations for submission to the Council for consideration.

1.3 Scope of the Strategic Industry Audit

The SIA focussed on delivery and assessment of the four (4) qualifications² listed below from the Community Services Training Package qualifications delivered in WA.

- CHC30208/CHC30212 Certificate III in Aged Care.
- CHC40108 Certificate IV in Aged Care.
- CHC30308/CHC30312 Certificate III in Home and Community Care.
- CHC40208/CHC40212 Certificate IV in Home and Community Care.

The Reference Group agreed that the above four (4) qualifications represented the majority of aged and community care training currently delivered in Western Australia and should be the focus of the audit.

The Reference Group determined that the SIA would focus on:

1. RTOs actively offering, or intending to offer, one (1) or more of the above qualifications in WA. A risk assessment, in line with the AQTF National Guideline for Risk Management, was conducted to determine which RTOs were selected as part of the audit sample;
2. specific units of competency for each qualification audited, including those focusing on medication and dementia support which represented a higher level of risk in the industry. The units selected are listed in **Appendix B**; and
3. all AQTF Essential Standards for Continuing Registration and a sample of AQTF Essential Conditions for Continuing Registration. These are listed in **Appendix C**.

1.4 Additional Areas of Focus

The Reference Group also identified areas of general concern to the local industry which were to be an additional focus for the audit. These included:

- short duration of classroom training;
- simulation of delivery and assessments;
- work placements, on-the-job experience and work-based assessments; and
- language, literacy and numeracy support.

These areas were included in the SIA where they relate to AQTF compliance and/or training package requirements.

1.5 Structure of the Strategic Audit

The audit was designed to ensure that issues of compliance with the AQTF were identified and that any rectifications undertaken by RTOs are monitored to ensure that quality improvements to the provision of training and assessment by RTOs are deployed and maintained. The assessment of the

² The qualifications were updated and deemed equivalent in the Version 4 of CHC08 Community Services Training Package, released 7 May 2012. Audits were conducted on the version of the qualification(s) the RTO was registered for.

deployment of improvements is a major factor in providing an assurance of the quality training to industry.

The audit has been structured in two (2) stages:

- Stage 1 – To identify RTOs compliance with the AQTF Standards, noting that the audit process provides the opportunity for rectifications to be undertaken against the original audit findings; and
- Stage 2 – To establish that the rectifications put in place by the RTO have been deployed and maintained by the RTO.

This report outlines the key findings and outcomes of Stage 1 of the SIA.

2. The Aged Care and Community Care Qualifications and Industry

2.1 The Aged Care and Community Care Sector

Aged Care is the personal care and/or nursing care provided to frail older Australians and their carers to facilitate independence, good health and wellbeing. Aged care is delivered through two (2) main programs: residential aged care and community care.

Aged Care is defined in more detail in the Productivity Commission's report, "Caring for Older Australians", as *a range of services required by older persons (generally 65 years and over (or 50 years and over for Indigenous Australians)) with a reduced degree of functional capacity (physical or cognitive) and who are consequently dependent for an extended period of time on help with basic activities of daily living. Aged Care is frequently provided in combination with basic medical services (such as help with wound dressing, pain management, medication, health monitoring), prevention, rehabilitation or palliative care services.*

Community Care is the provision of care and support for people who want to stay independent and living at home for as long as possible. This includes Home and Community Care services, Community Aged Care Packages and respite care services for carers.

The Productivity Commission report defines **Home and Community Care (HACC)** as *a program which provides a broad range of low-level care and support services to help people maintain their independence at home and in the community. HACC is a joint Australian, state and territory initiative.*

Community Aged Care Packages (CACP) are individually planned and coordinated packages of care tailored to help older Australians with low-level care needs to remain living in their own homes. They are funded by the Australian Government to provide for the complex care needs of older people.

Key points raised in the Productivity Commission's report show that over one (1) million older Australians receive aged care services, with more than half receiving low-intensity support through the HACC programs. Over 3.5 million Australians are expected to use aged care services by 2050.

Snapshot of the Community Services industry

The 2013 E-Scan released by the Community Services and Health Industry Skills Council (CSandHISC) "The Care Industry – A Time for Action"³ finds that the community services and health area is Australian's largest industry group. The E-Scan reports that:

- 2012 ABS statistics show that the industry employs 9% of the workforce and contributes significantly to the economy;
- employment is projected to grow by at least 35% over the next 10 years;
- expenditure on health has increased by \$55 billion in the past 10 years, from \$77.5 billion in 2000-2001 to \$130.3 billion in 2010-2011; and
- the number of students studying community services has increased by 19% nationwide.

³ Community Services & health Industry Skills Council, EScan 2013 The Care Industry – A Time for Action!
<http://www.cshisc.com.au/learn/cshisc-environmental-scan/escan-2013/>

In particular, the Aged Care and Disability industry:

- ranks in the top ten fastest-growing sectors of the industry;
- workforce increased by 40% (30,000 workers) between 2006 and 2011; and
- workforce is predicted to increase from 116,800 in 2011 to 140,600 in 2016-17 (a 20% increase).

Aged Care continues to be the largest sector for training activity, together with general community services qualifications and Children's Services.

The E-Scan also reports that the industry is facing a number of challenges including:

- an ageing workforce – 2011 census data indicates the industry is ageing faster than the overall Australian workforce; the age bracket of 15-29 declined as a proportion of the workforce, while the 50 and above age bracket increased; 22% of the industry workforce are 55 years and over;
- an increase in life expectancy;
- policy objectives to keep people at home and in the community is extending the range of roles that must develop skills portability to manage comorbidity; examples of changes to job roles:
 - Managers need to develop the capability to manage the logistics of a shift to home-centred care and supervision of staff in multiple locations;
 - Community nurses and HACC workers need to be able to manage and provide appropriate care for dementia patients;
 - Aged care employers want workers to be able to teach healthy eating and food preparation; e.g. a graduate with a Certificate III in Aged Care or Personal Care Assistant may also need to have the Certificate II in Hospitality or add related units to their qualification;
- an acute shortage of community services and health workforce in regional/rural/remote Australia;
- the need for greater language numeracy and literacy skills is especially vital in direct care and support occupations;
- the move toward a model of client-led care and worker autonomy will need to be reflected in a broader framework, including supervisory arrangements for home-based care, appropriate support, remuneration and funding for job roles; these changes will need to be reflected in training packages; and
- workplace supervision is much less entrenched in community services.

The E-Scan provided comment on the current impact of training packages:

- less than two (2)-thirds of respondents (60%) to an online survey were satisfied with the quality of training provided to students and existing workers; commonly expressed concerns included:
 - the speed with which some providers are graduating students may compromise training; and
 - the capacity of e-learning and simulated learning environments to substitute for a workplace setting.

An appropriately skilled and well-qualified workforce is fundamental to the delivery of quality aged care across both the residential and home care sectors.

The Department of Health and Ageing in its “Living Longer Living Better”⁴ report identifies that aged care services continue to have difficulties attracting and retaining sufficient numbers of skilled and trained workers with a 25% turnover rate of workers in the aged care sector. This leads to reduced productivity, higher training costs and negative impacts on the quality of care.

2.2 Regulation of the Aged Care Sector in Western Australia

In Australia, residential aged care homes are required to be accredited to receive Australian Government subsidies. The independent accreditation body, the Aged Care Standards and Accreditation Agency⁵, promotes high quality care in the Australian Government subsidised residential aged care sector through the management of the accreditation program and a comprehensive industry education program.

The Aged Care Standards and Accreditation Agency determines whether an aged care home should be accredited and for how long through on-site accreditation assessments of the quality of care provided by the aged care home. The quality of care is measured against the Accreditation Standards set out in the *Aged Care Act 1997*.

2.3 Community Care Common Standards

The Community Care Common Standards⁶ have been developed jointly by the Australian Government and State and Territory Governments as part of broader community care reforms to develop common arrangements that help to simplify and streamline the way community care is delivered. The Common Standards draw together the differing community care standards into a single set of quality standards and have the benefit of reducing the administrative burden for service providers.

The Community Care Common Standards apply to the following community aged care programs:

- Home and Community Care (HACC);
- Community Aged Care Packages (CACP);
- Extended Aged Care at Home (EACH);
- Extended Aged Care at Home Dementia (EACHD); and
- National Respite for Carers Program (NRCP).

The Department of Health and Ageing and the relevant State and Territory government departments or their representatives will be conducting quality reviews.

⁴ Commonwealth of Australia, April 2012, “Living Longer Living Better”
<http://www.health.gov.au/internet/publications/publishing.nsf/Content/ageing-aged-care-reform-measures-toc>

⁵ Aged Care Standards and Accreditation Agency Ltd, <http://www.accreditation.org.au/about-us/>

⁶ Department of Health and Ageing, Australian Government website, www.health.gov.au, 22 March 2013

2.4 Home and Community Care Assessment Framework

The WA Assessment Framework (WAAF)⁷, which was implemented in the Perth Metropolitan area at the beginning on 2011 and in the South West and Kimberley regions in July 2012, has resulted in a significant shift in the way HACC support is delivered.

The overall goal of the WAAF is to ensure that *all community care clients and their carers receive a personalised, quality service that is underpinned by an assessment that identifies their needs, builds on their strengths and reflects their aspirations.*

The effectiveness of the WAAF is being continually monitored.

More detail on the aged and community care industry is provided in **Appendix D**.

2.6 Training Package Qualifications

The following descriptions of the four (4) qualifications included in the audit are based on information from the Community Services Training Package⁸. The Training Package is developed by the Community Services and Health Industry Skills Council (CSandHISC) in conjunction with industry. This information is provided to give context to the information within this report in respect to job roles or occupations and the relationship to nationally recognised qualifications.

CHC30212 Certificate III in Aged Care

The aim of the Certificate III in Aged Care is to equip learners to work primarily in residential facilities under direct or regular supervision within clearly defined organisational guidelines and service plans.

The job roles of graduates of the qualification:

- carrying out activities to maintain personal care and/or other activities of living for people in an aged care facility
- carrying out activities related to an individualised plan
- report directly to a supervisor and are not responsible for other workers

Occupations relevant to this qualification may include:

- Accommodation support worker
- Assistant in nursing
- Care assistant
- Care service employees
- Care worker
- Community care worker
- Community house worker
- Community support worker
- Disability service officer (in some jurisdictions)
- Field officer
- Home care assistant
- In-home respite worker
- Nursing assistant
- Personal care assistant
- Personal care giver
- Personal care worker
- Residential care worker
- Support worker

⁷ WA Assessment Framework information, <http://www.communitywest.com.au/Assessment-Framework/introduction-to-assessment-framework.html>

⁸ Community Services training package, CHC08: www.training.gov.au

To gain entry into CHC40108 Certificate IV in Aged Care, the candidate must be recognised as competent, through a recognised training program or recognition process, against the six (6) core units from the CHC30212 Certificate III in Aged Care (or equivalent).

CHC40108 Certificate IV in Aged Care

The aim of the Certificate IV in Aged Care is to equip learners to work primarily in residential facilities within defined organisational guidelines and service plans.

The job roles of graduates of the qualification:

- carrying out activities related to maintaining an individual's wellbeing through personal care and/or other activities of living
- providing services to individuals with complex needs, and/or with groups of older people.
- training and support to promote independence and community participation, which may be provided as part of activities and programs in a variety of settings including residential and centre-based programs
- reporting to service managers and liaison with professionals and other service providers
- supervision and/or coordination of a limited number of other workers

Occupations relevant to this qualification may include:

- Accommodation support worker
- Assistant hostel supervisor
- Care supervisor
- Care team leader
- Day activity worker
- Hostel supervisor
- Personal care worker
- Program coordinator – social programs
- Residential care worker
- Support worker

CHC30312 Certificate III in Home and Community Care

The aim of the Certificate III in Home and Community Care is to equip learners to work in client homes and other community settings under regular supervisor within clearly defined organisational guidelines and service plans.

The job roles of graduates of the qualification:

- carrying out activities to maintain personal care and/or other activities of living for people in their own home or in other community settings
- carrying out activities related to an individualised plan
- reporting directly to a supervisor and are not responsible for other workers

Occupations relevant to this qualification may include:

- Care assistant/worker
- Care service employee
- Community care worker
- Community support worker
- Disability support worker
- Driver
- Food services deliverer
- Home care worker
- Home maintenance worker
- In-home respite giver
- Personal care assistant
- Personal care giver/worker
- Planned activity assistant
- Transport support worker
- Support worker

To gain entry into CHC40212 Certificate IV in Home and Community Care, the candidate must be recognised as competent, through a recognised training program or recognition process, against the three (3) core units from the CHC30312 Certificate III in Home and Community Care (or equivalent).

CHC40212 - Certificate IV in Home and Community Care

The aim of the Certificate IV in Home and Community Care is to equip learners to work in client homes and other community settings within defined organisational guidelines and service plans.

The job roles of graduates of the qualification:

- carrying out activities relating to maintaining an individual's wellbeing through personal care and/or other activities of living
- providing services to individuals with complex needs, and/or work with groups of older people. work may include training and support to promote independence and community participation, which may be provided as part of activities and programs in a variety of home and community care settings
- reporting to service managers and liaising with professionals and other service providers
- supervision of and/or coordination with a limited number of other workers

Occupations relevant to this qualification may include:

- Assistant coordinator
- Assistant team leader
- Care team leader
- Community house worker
- Community support worker
- Day activity worker
- In-home respite care
- Personal care worker
- Senior community care worker
- Service coordinator
- Support worker
- Transport coordinator

3. Audit Methodology

3.1 RTO survey – All RTOs registered for qualifications

A preliminary survey of all providers registered to deliver one (1) or more of the nominated qualifications in WA was conducted in late 2011. This survey provided information about RTOs actually delivering the qualifications in WA in 2011 and those intending to commence or continue delivery in 2012. 144 RTOs were contacted as part of the survey. The response rates for the respective industry sectors are outlined below in **Figure 1**.

Figure 1: Results of pre-SIA survey to establish actual delivery of Aged Care and Home and Community Care (HACC) training in WA.

Aged Care sector

Registering Body	RTOs that responded to survey	RTOs with Certificate III in Aged Care on scope	RTOs with Certificate IV in Aged Care on scope	RTOs that delivered Aged Care training in WA in 2011	RTOs intending to continue or commence in WA in 2012
WA TAC	28 (19%)	28 (19 %)	23 (16%)	25 (17%)	26 (18%)
ASQA	114 (79%)	104 (72 %)	79 (55%)	21 (15%)	42 (29%)
VRQA	2 (1%)	2 (1 %)	2 (1%)	0 (0%)	0 (0%)
Total	144	134	104	46	68

Home and Community Care sector

Registering Body	RTOs that responded to survey	RTOs with Certificate III in HACC on scope	RTOs with Certificate IV in HACC on scope	RTOs that delivered HACC training in WA in 2011	RTOs intending to continue or commence in WA in 2012
WA TAC	28 (19%)	20 (14%)	11 (8%)	15 (10%)	18 (13%)
ASQA	114 (79%)	64 (44%)	30 (21%)	7 (5%)	20 (14%)
VRQA	2 (1%)	0 (0%)	0 (0%)	0 (0%)	0 (0%)
Total	144	84	41	22	38

Note: % is the proportion of RTOs that responded to survey (144 RTOs were contacted for the survey).

The survey results indicated that only a small percentage of the RTOs registered on the National Register (www.training.gov.au) to deliver the Aged Care and Home and Community Care qualifications in WA were actively offering training and assessment services in WA. The data showed:

For Aged Care:

- 34% of the RTOs registered for Aged Care qualifications (CHC08 version) had delivered or were currently delivering the qualifications in WA in 2011; and
- just over 50% of RTOs registered for the qualifications would commence or continue to deliver Aged Care training in 2012

For HACC:

- 26% of the RTOs registered for Home and Community Care qualifications (CHC08 version) had delivered or were currently delivering the qualifications in WA in 2011; and
- just over 45% of RTOs registered for the qualifications would commence or continue to deliver Community Care training in 2012.

3.2 Audit Sample

The information gathered from the survey and input from the reference group informed the risk assessment for selection of RTOs for the SIA audit sample. The risk assessment, which was conducted in line with the AQTF National Guideline for Risk Management, included factors such as:

- recent registering body audits;
- current trainee numbers;
- funding (whether in receipt of Australian Government or State Government funding);
- relevant RTO history and history of compliance; and
- survey results.

22 TAC registered RTOs and six (6) ASQA registered RTOs were selected as part of the initial audit sample. Two (2) of the TAC RTOs removed the nominated qualifications from their scope of registration following notification of their inclusion in the audit sample. One (1) TAC RTO relinquished its registration as it was transitioning all students to another RTO as part of its business planning. This resulted in 19 TAC registered RTOs in the final audit sample.

One (1) of the selected ASQA RTOs had been audited as part of the regular ASQA audit programme and was therefore excluded from the audit sample. In total, 24 RTOs were audited as part of the SIA. **Figure 2** below shows the breakdown of the RTOs by type of organisation.

Figure 2: Breakdown, by type, of RTOs in the audit sample, both TAC and ASQA registered

Type of organisation	Number of RTOs
Private RTO	12
State Training Provider/TAFE	9
Enterprise – non government	2
Community-Based Adult Education Provider	1

Location of organisation's head office	Number of RTOs
Metropolitan WA	14
Regional WA	6
Interstate (outside of WA)	4

3.3 RTO survey – RTOs in audit sample

A second targeted survey was sent out to both the TAC and ASQA RTOs selected for audit, to gather specific information to assist the auditors with the audit. A detailed summary of the findings of this survey is in **Appendix E**.

The survey also provided a snapshot of the current WA training market in these industry sectors.

- 61% of the RTOs in the audit sample were registered to deliver both Aged and Community Care training; 100% of the RTOs offered the Certificate III in Aged Care; 88% offered the Certificate IV in Aged Care; 63% delivered the Certificate III in HACC; and only 33% offered the Certificate IV in HACC.
- The most common delivery modes across all 4 qualifications were classroom/face-to-face and on the job.
- Over 75% of the RTOs in the audit sample offered the training to trainees and existing workers.

- A combination of assessment in the workplace and by simulation was the most significant assessment methodology indicated.
- 96% of the RTOs in the audit sample receive State government funding for the Certificate III in Aged Care.
- Only 1 RTO had partnership arrangements with another organisation to deliver the qualification(s).
- The Certificate III in Aged Care had the highest number of enrolments (1700) for January-September 2012, with the TAC registered RTOs enrolling 85% of the learners in this qualification in this period. TAC RTOs also enrolled 91% of the learners for the Certificate III in Home and Community Care in this period.

3.4 Industry Advisors

The role of the industry advisors in the SIA was to provide input on current industry requirements, equipment and practices.

Industry advisors were nominated by the Reference Group and were briefed with auditors about their roles and the requirements of the SIA in August 2012. Where practicable, industry advisors accompanied auditors on site visit audits.

3.5 Audit Process

Audits were conducted by the TACs external panel of auditors and undertaken as site visits. The compliances and non-compliances identified in this report are based on the outcomes on the day of the audit. It is important to note that for an RTO to maintain registration under the AQTF it must be fully compliant with the AQTF at all times.

TAC processes allow for RTOs that are found non-compliant against the AQTF Essential Conditions and Standard for Continuing Registration at audit to provide additional evidence within a specified timeframe, 20 working days after receipt of the audit report, in order to demonstrate compliance.

In some instances, provision of additional evidence is sufficient to demonstrate compliance with the Standards; however, where non-compliances remain, the matter is referred to TAC for further consideration and action.

Further details on the audit methodology for this SIA are detailed in **Appendix F**.

4. Audit Outcomes for TAC Registered RTOs

24 RTOs were audited in total; 19 registered with TAC and five (5) registered with ASQA. The 19 TAC registered RTOs were audited in October and November 2012. The five (5) ASQA RTOs were audited by ASQA auditors between January to March 2013 in their head office state and site inspections in WA where required.

The outcomes identified in this section are from the 19 audits of TAC registered RTOs. The outcomes of the ASQA registered RTOs are detailed in section 5. This is due to the differences in the name and numbering of the standards in the AQTF and under the NVR Quality Framework.

TAC audits are reported by industry area, which in this SIA is the Community Services industry area, not by individual qualifications. As the audit did not identify any non-compliances that related only to specific qualifications, the information presented in the report broadly summarises the outcome of the audits against all four (4) qualifications collectively.

4.1 Audit Impact on RTOs Providing Aged Care and Home and Community Care Qualifications in Western Australia

The conduct of the strategic industry audit resulted in 29% of RTOs identified in the original audit sample ceasing to provide training in the Aged Care and Home and Community Care industry.

Of the original 22 TAC registered RTOs identified through the audit sample six (6) are no longer operating in the areas of aged care and home and community care:

- 2 (9%) RTOs removed the nominated qualifications from their scope of registration following notification of their inclusion in the audit sample;
- 1 (5%) RTO voluntary relinquished their RTO registration prior to commencement of the site audits;
- 1 (5%) RTO that had been found significantly non-compliant at audit and subsequently had demonstrated compliance with the AQTF, voluntary relinquished their RTO registration, indicating that their training was no longer financially viable;
- 1 (5%) RTO that had been found critically non-compliant removed the nominated qualifications from their scope within the 20 day rectification period; and
- 1 (5%) RTO that had been found significantly non-compliant had their registration cancelled by the Council.

4.2 Key Findings of AQTF Compliance

The key findings of the audit support industry and the Productivity Commission's concerns about the quality of training and assessment.

Overall, the SIA found that there was a high level of non-compliance with the AQTF Essential Conditions and Standards for Continuing Registration with over 50% of RTO found to have either significant or critical levels of non-compliance.

Of the 19 TAC registered RTOs:

- 2 (11%) were found to be fully compliant at the time of audit;
- 7 (37%) had minor non-compliances;
- 8 (42%) had significant non-compliances; and
- 2 (11%) were found to have critical non-compliances.

If an RTO has been found to have significant non-compliance, the requirements of the AQTF Essential Conditions and Standards for Continuing Registration have not been met based on the evidence reviewed and there are indications of a significant adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace.

If an RTO has been found to have critical levels of non-compliance, the requirements of the AQTF Essential Conditions and Standards for Continuing Registration have not been met based on the evidence reviewed and a critical adverse impact on learners and/or consumers of goods and services produced in the training environment or the current (or future) workplace is occurring or has occurred.

The highest levels of non-compliance within the standards related to the following:

- **68% of RTOs (13) audited were non-compliant with the requirement that *Assessment including Recognition of Prior Learning (RPL) is conducted in accordance with the principles of assessment and the rules of evidence;***
- **63% of RTOs (12) audited were non-compliant with the requirement that *staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies;* and**
- **47% of RTOs (9) audited were non-compliant with the requirement that *Training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed.***

Compliance with the AQTF Standards is detailed in **Section 4.3**.

The categories of non-compliance are defined in the AQTF 2007 National Guideline for Managing Non-Compliance which are adopted by the Council, an extract of which has been provided at **Attachment 1**.

4.2 Identified Strengths

The audits identified good practice at 12 (63%) of RTOs. They included:

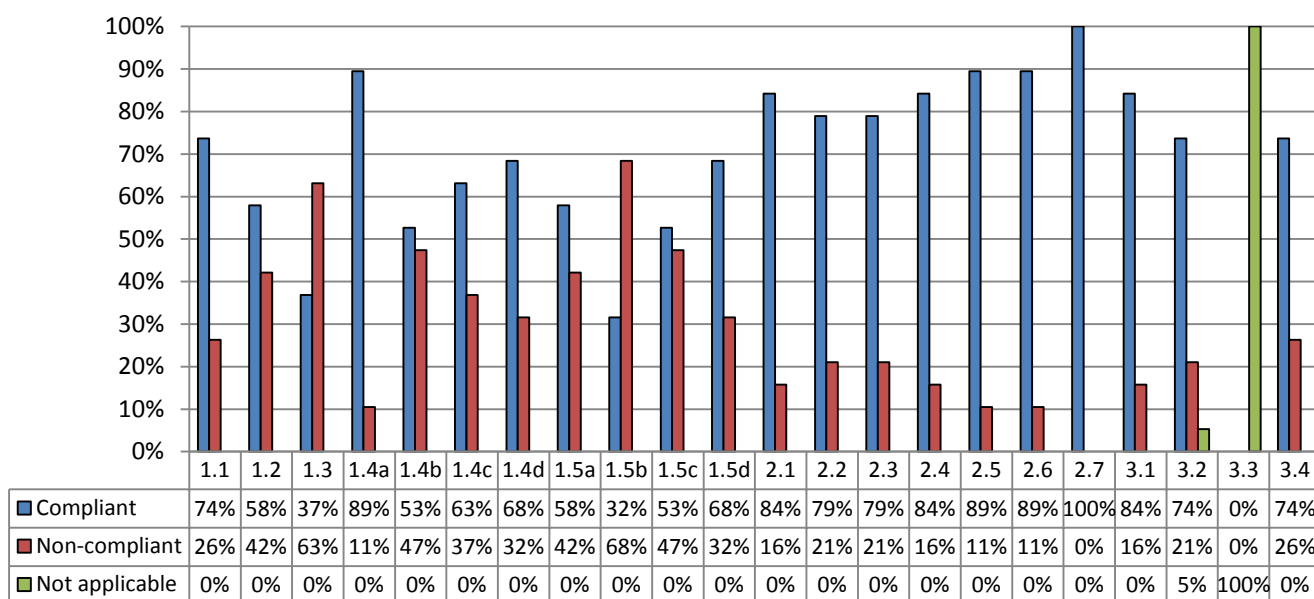
- access to onsite trainers/skill coaches in the learners' work environment;
- the level of satisfaction expressed and positive feedback from student interviews;
- learning resources reflective of and customised to meet a mostly aboriginal target audience;
- use of technology to support resources to remote community locations;
- clear and comprehensive promotional information about work expectations and formal requirements;
- passionate, well qualified and experienced staff;
- strong focus on supporting students;
- student information providing clear, comprehensive information to trainees, employers and staff; student booklet is informative, succinct and supportive of quality student engagement;
- gathering meaningful information relating to client needs and ensuring they are understood and accommodated in service delivery;
- excellent links with industry; and
- evidence of strong community relationships, developed over time, and trust established with training and assessors, particularly in the regional communities.

4.3 Compliance with the AQTF Conditions and Standards for Continuing Registration

4.3.1 Areas of Compliance with AQTF Standards

Figure 3 reports on RTO compliance at the initial audit with AQTF Essential Standards for Continuing Registration (prior to rectification).

Figure 3: Compliance with AQTF Standards - Main audit
RTO compliance by AQTF Essential Standards of Continuing Registration
(19 TAC registered RTOs)



The audit found high levels of compliance (75-100%) with the following Standards:

- **Standard 1.4a** – Training and assessment is delivered by trainers and assessors who have the necessary training and assessment competencies as determined by the National Quality Council or its successors;
- **Standard 2.1** – The RTO establishes the needs of clients, and delivers services to meet these needs;
- **Standard 2.2** – The RTO continuously improves client services by collecting, analysing and acting on relevant data;
- **Standard 2.3** – Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations;
- **Standard 2.4** – Employers and other parties who contribute to each learner’s training and assessment are engaged in the development, delivery and monitoring of training and assessment;
- **Standard 2.5** – Learners receive training, assessment and support services that meet their individual needs;

- **Standard 2.6** – *Learners have timely access to current and accurate records for their participation and progress;*
- **Standard 2.7** – *The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively; and*
- **Standard 3.1** – *The RTO’s management of its operations ensures clients receive the services detailed in their agreement with the RTO.*

The high level of compliance with **Standard 1.4a** *Training and assessment is delivered by trainers and assessors who have the necessary training and assessment competencies as determined by the National Quality Council or its successors* raises potential issues relating to the suitability and quality of delivery of the TAE12 Certificate IV in Training and Assessment as the minimum qualification to be held by trainers and assessors given the high levels of non-compliance identified with assessment in the SIA. This issue is further discussed in Section 9.1.2.

None (1) of the 19 TAC registered RTOs was audited for **Standard 3.3** – *the RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration*. This indicates that the qualification(s) is delivered and assessed using the RTO’s own staff, and not through partnership or sub-contracting arrangements.⁹

4.3.2 Areas of Non-Compliance with Standards

The audits found that 17 (89%) of the TAC registered RTOs in the audit sample were non-compliant with the AQTF Essential Standards for Continuing Registration at the time of audit. Seven (7) RTOs (37%) had minor non-compliances; eight (8) (42%) had significant non-compliances and two (2) (11%) had critical non-compliances reported.

The level of non-compliance is determined across the RTO, not at qualification or standard level.

The highest levels of overall non-compliance were in relation to:

- **Standard 1.3** – *Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO’s own training and assessment strategies* – 63% of RTOs (12) were non-compliant:
- **Standard 1.4b** – *Training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed* – 47% of RTOs (9) were non-compliant:
- **Standard 1.5b** – *Assessment including Recognition of Prior Learning (RPL) is conducted in accordance with the principles of assessment and the rules of evidence* – 68% of RTOs (13) were non-compliant: and
- **Standard 1.5c** – *Assessment including Recognition of Prior Learning (RPL) meets workplace and, where relevant, regulatory requirements* – 47% of RTOs (9) were non-compliant.

10 of the 13 RTOs that were non-compliant against Standard 1.5b were found to be significantly non-compliant (8) or critically non-compliant (2) overall. Seven (7) of these 13 RTOs were also non-

⁹ In the pre-audit survey reported in section 3.1, the one (1) RTO that indicated a partnership arrangement is registered with ASQA, and therefore is not included in this reported outcome.

compliant with other AQTF standards related to assessment, namely Standard 1.5a and Standard 1.5c.

A categorisation of significant non-compliance indicates that the RTO's non-compliances are likely to have a significant adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workforce.

For the eight (8) RTOs that were significantly non-compliant, the non-compliances were related to assessment of competency, which indicates that training and assessment systems are not sufficiently focussed on quality training and assessment outcomes.

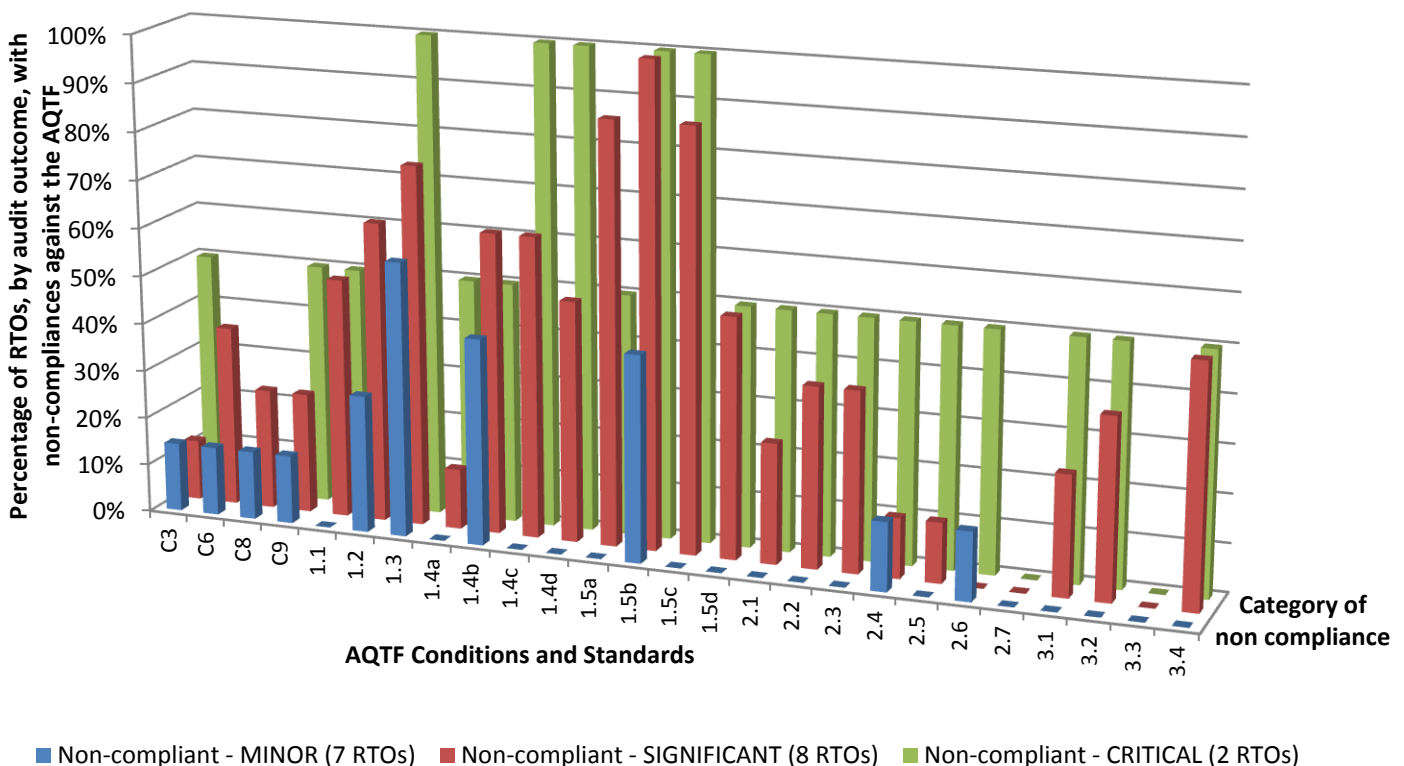
The level of significant non-compliance raises concerns about whether learners are actually achieving the competency as specified by the qualification.

RTOs are deemed to be critically non-compliant when, based on the evidence reviewed, there is a critical adverse impact on learners and/or consumers of goods and services produced in the training environment or current (or future) workplaces. Two (2) RTOs were deemed to be critically non-compliant, which meant that their training and assessment systems were not achieving quality training and assessment outcomes.

Figure 4 below illustrates the non-compliances found, by proportion of RTOs, for each category of non-compliance. It illustrates that the areas with high levels of non-compliances identified with assessment are linked to a significant and critical level of non-compliance.

Figure 4: Distribution of RTO non-compliances by audit outcome

Distribution of non-compliances identified at audit by audit outcome – minor, significant or critical non-compliance – by proportion of RTOs with that level of non-compliance after main audit.



4.3.3 Description of Non-Compliances

The following is a synopsis of comments in the audit reports relating to the above areas of non-compliance. Whilst there was some variation in auditor comments, consistent trends were evident across the majority of the non-compliant RTOs. For example, all RTOs identified as being significantly or critically non-compliant were found to have most of their non-compliances in relation to assessment.

Assessment (Elements 1.5a, 1.5b, and 1.5c)

A significant number of issues were identified in respect to assessment instruments for all RTOs. The majority of non-compliances in this standard related to assessments not meeting the rules of evidence for: validity, sufficiency and authenticity. This means that assessments were not:

- enabling assessment of the competency as described;
- gathering the required evidence to make a sound judgement about achievement of competency; and
- ensuring that the assessments were actually the work of the student.

For most of the RTOs with non-compliances in this area, evidence was not provided to demonstrate that the various assessment instruments and tools used gathered **sufficient** evidence to meet the requirements of the qualification(s) and Training Package. Some RTOs were able to provide mappings of instruments to the training package; however their documents were incomplete or out of date. The assessments did not meet or reflect workplace requirements either, which is evidenced by the non-compliances against Standard 1.5c.

There were occasions identified where there was no relationship between the methods and approaches outlined in the assessment strategy and what was actually occurring in practice.

Recognition of Prior Learning (RPL) was noted as an issue in several audits. One (1) RTO did not have an RPL process. Another RTO had signed off students for RPL; however, a review of their student files, showed that assessments were missing, despite records indicating that RPL had been completed and the student was deemed competent.

Assessment instruments – knowledge component

It was reported that a number of RTOs allowed students to take home the assessments instruments used for the written, knowledge-based components. In the audit of two (2) RTOs, the assessment tools pointed students to a particular page in a book or training slide for the answer and the auditor observed a significant degree of consistency in the answers in the student assessments reviewed. The reported non-compliances cast doubt on the **authenticity** of the assessments. What was really being assessed? The student's knowledge and its application or the ability to locate the information?

One (1) RTO required a 70% pass mark for written assessment, which is not consistent for assessments for competency-based training. In another instance, the questions and student responses within the Certificate IV, as identified in student files, were not at the appropriate AQF level.

Assessment instruments – practical (workplace) component

Requirements for workplace assessment are described in the assessment requirements for all the units in the audit sample. The following examples from a range of the units selected for audit are provided as illustration.

CHCICS301B – Provide support to meet personal care needs

“It is recommended that assessment or information for assessment will be conducted or gathered over a period of time and cover the normal range of workplace situations and settings.

This unit must be assessed in a work context and under the normal range of workplace conditions.

Where, for reasons of safety, space or access to equipment and resources, some assessment takes place away from the workplace, the assessment environment should represent workplace conditions as closely as possible” [Critical aspects for assessment]

(Certificate III in Aged care and Certificate III in HACC)

CHCPA301B Deliver care services using a palliative approach

- *“Assessment will be conducted or evidence gathered over a period of time and cover the normal range of workplace situations and settings*
- *Consistency of performance should be demonstrated over the required range of situations relevant to the work role*
- *Evidence of competence must be demonstrated through a minimum of three (3) different assessment methods, which may include:*
 - *observation in the workplace.....”* (Critical aspects for assessment)

(Certificate III in Aged care and Certificate III in HACC)

CHCICS401B Facilitate support for personal care needs

“It is recommended that assessment or information for assessment will be conducted or gathered over a period of time and cover the normal range of workplace conditions and settings

This unit will be most appropriately assessed in the workplace and under the normal range of workplace conditions.” (Critical aspects for assessment)

(Certificate IV in Aged Care and Certificate IV in HACC)

In a number of audits it was reported that the evidence for the practical components was based solely on assessment by third parties, by a person who was not the nominated RTO assessor. In some cases, the RTO assessors did not visit the workplace at all, did not attempt to verify or monitor the quality of input by the third party or could not provide evidence that the third parties were vocationally competent. It was reported that third parties were often not involved in moderation for consistency or benchmarking of assessment. One (1) RTO accepted a self-report of workplace experience from students, with verification by a workplace supervisor who, in this instance, was not in the workplace when the students were there.

The poor assessment and evidence-gathering practices reported cast doubt on the validity, sufficiency and authenticity of assessment overall.

Where the RTO assessors observed students in the workplace, there were reported instances of the visits being between 30 and 60 minutes at one (1) RTO and up to two (2) hours at another. The auditors noted that it would not be possible to observe competency in the required tasks over time and in varying contexts in 1-2 hours.

In other instances there was no evidence of any practical assessment or formal record of observation of trainees' performance in the workplace. Observation checklists viewed had items marked 'not applicable' when these items assessed required components of the unit of competency or had been completed with rows of ticks with no further information about what task had been completed or what context the task was undertaken in.

Workplace Context

The workplace context for the assessments was identified as critically non-compliant in one (1) audit. The workplace used for assessment was inadequate for the demonstration of many aged care skills as described in qualifications. The workplace was a day-visit facility that only provided respite weekend accommodation for the aged. The experiences available at the facility were limited and did not enable the full range of aged care training and assessment activities required to attain the qualification.

Other audits found that there was no evidence to demonstrate how RTOs ensured HACC students had access to the full range of experiences reflective of the full program, or evidence to show when tasks had been completed in an aged care or community care environment, where the dual qualification was offered.

The audit report for one (1) RTO which was delivering all four (4) qualifications in short durations noted "*there was no observation checklist for simulated workplace activity and workplace experience was not assessed*". In another case where delivery was over a short time frame, the audit reported that "*..the assessment process did not verify that each student had demonstrated each required element of competency and each required skill from each unit of competency in the workplace*".

It should be noted that similar observations and non-compliances were also reported for RTOs delivering in significantly longer timeframes.

Vocational Competency of Trainers and Assessors (Element 1.4b)

Standard 1.4b requires that training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed. Nine (9) RTOs were not able to demonstrate how the vocational competency of its nominated trainers and assessors had been established.

The audit reports indicated that there was no evidence of systematic processes to determine how trainers demonstrated the vocational competency for the qualification they were delivering, the trainer held superseded versions of the qualification, or the matrix the RTO was using to demonstrate equivalence did not have sufficient information.

Staff, Facilities, Equipment and Training and Assessment Materials (Element 1.3)

Standard 1.3 requires RTOs to have the resources (staff, facilities, equipment, and training and assessment materials) that are consistent with the requirements of the Training Package and the RTO's own training and assessment strategies. This element is closely inter-related with other elements, for example with the strategies for training and assessment (Standard 1.2), trainer and assessors qualifications (Standard 1.4) and assessment (Standard 1.5). In most cases non-compliances in these standards were also reflected in non-compliances in Standard 1.3.

11 of the 12 RTOs (63%) found to be non-compliant with Standard 1.3 were also non-compliant with Standard 1.4 and/or 1.5. The other RTO was non-compliant with this standard in relation to not been able to demonstrate how it ensures employers have the capacity to train learners across the scope of competency requirements of the qualification.

4.3.4 Areas of Compliance with Conditions of Registration

The AQTF Essential Conditions of Registration are requirements that form an RTO’s contractual agreement with the registering body and the following were selected for audit:

- Condition 3 – Compliance with legislation**

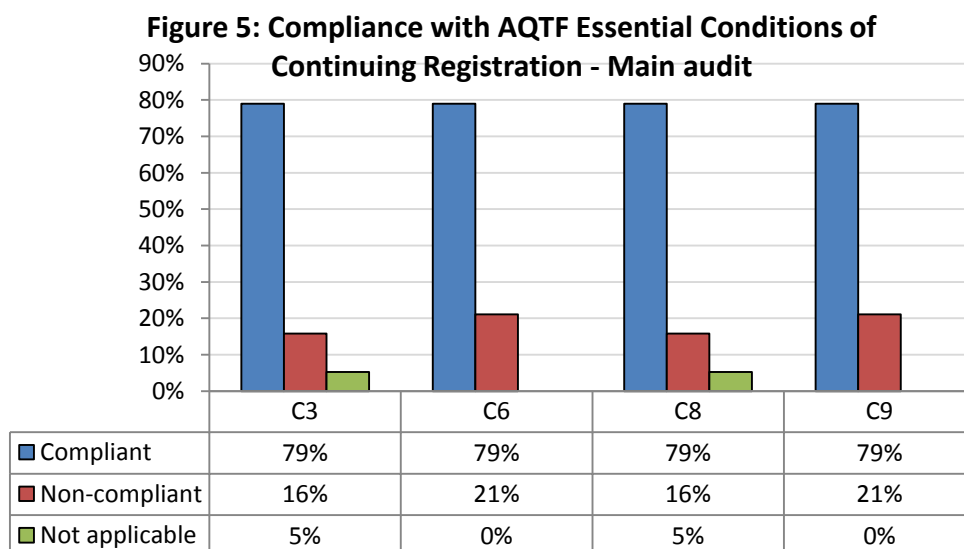
This condition includes all legislation, and regulatory requirements, that relate to an RTO’s operations and scope of registration. This ensures that all staff and clients are fully informed of these requirements.
- Condition 6 – Certification and Issuing of Qualifications and Statements of Attainment**

This condition relates to the issuance of qualification Certificates and statements of attainment, retention of the records and returns of student achievement data.
- Condition 8 – Accuracy and Integrity of Marketing**

The advertising and marketing of AQF qualifications is required to be ethical, accurate and consistent with its scope of registration.
- Condition 9 – Transition to Training Packages / Expiry of Courses**

The transition from superseded training packages must be managed within 12 months of the publication of the new/current qualification.

Figure 5 below reports on RTO compliance from the initial audit against the subset of AQTF Essential Conditions of Continuing Registration audited. Non-compliances identified during the rectification period are not included in this data.



Overall there was a high level of compliance demonstrated across the Conditions of Registrations audited.

4.3.5 Areas of Non-Compliance with AQTF Conditions of Registration

The areas of non-compliance with these Conditions are summarised below.

- Three (3) RTOs (16%) had non-compliances reported with Condition 3.
Two (2) of the RTOs (11%) were non-compliant in relation to complying with the requirement of the VET legislation in relation to traineeships. The RTOs could not demonstrate how they had determined the employer's capacity to provide training across the scope of competency requirements for each qualification, how any gaps in capacity would be addressed by the RTO to ensure continuity in training for the trainee or how trainers, employers and trainees were informed of their legislative responsibilities.
One (1) RTO did not provide information about the police clearance or medical requirements to work in the aged care industry to potential students prior to enrolment. This means that students are not able to make a fully informed choice about their choice of study.
- Four (4) RTOs (21%) were found to be non-compliant with Condition 6. The qualification testamur and statement of attainments for all four (4) RTOs did not meet the requirements of the Australian Qualifications Framework (AQF) guidelines.
- The marketing used by three (3) RTOs (16%) was non-compliant with Condition 8. The non-compliances were in relation to use of old codes on its website, no distinction between nationally recognised and non-nationally recognised training services on its website and incorrect use of the Nationally Recognised Training logo on advertisements.
- Four (4) RTOs (21%) did not provide evidence in relation to the transition from the superseded (CHC08) version of the qualification(s) to the current (CHC12) version, in line with Condition 9.

4.4 Student and Employer Interviews

Student interviews were conducted as part of the AQTF audits. Overall the feedback from students was positive regarding the support provided from the RTO; satisfied with the information provided by the RTO; they were happy with the training provided; they understood the requirements of the course; they liked the buddy system and workplace orientation.

Some of the feedback included the feeling that the students would benefit from more, and better timed, visits by the RTO assessor. In one (1) case, existing worker students in the Certificate IV in Aged Care felt that the self-study option would be difficult if the students were on their own, however as there was a group at the same facility they arranged to have weekly study group with the RTO and the employer.

A sample of employers was also interviewed by auditors as part of the standard AQTF audit process. The general feedback from all employers interviewed was positive, where they were generally happy and satisfied with the RTO's performance, the training program and were supportive of the RTO and the students they had. The interviews indicated that employers felt the students had adequate skills and were comfortable with the language level of the students. This feedback was in contrast to many of the issues raised by employers through the Employer survey presented in Section 7.

5 Additional Areas of Focus

As stated previously, the SIA focussed on compliance with the AQTF Essential Conditions and Standards of Continuing Registration. The Reference Group also requested the investigation of additional aspects of training and assessment. The data for these specific aspects are provided below.

5.1 Duration of Training

The short duration of training was one (1) of the primary concerns of the Reference Group. It was clarified early in the SIA that the nominal duration of courses is not stipulated within the training package requirements, and therefore the length of the course offered cannot be audited standalone (1). Instead the focus is on the adequacy of the course duration and whether the course allows learners to achieve the requirements stipulated for the qualification in the training package.

The SIA found that significant or critical levels of non-compliance were not exclusively attributed to a particular duration of training, however a higher proportion of RTOs delivering in short timeframes were found to have significant levels of non-compliance.

Competency-based training focuses on what is expected of a competent individual in the workplace as an outcome of learning, rather than focusing on the learning process itself or the hours of delivery. Audits under the AQTF focus on the assessment of competency. The SIA found that significant or critical levels of non-compliance were not exclusively attributed to a particular duration of training. In many cases, the audit highlighted that non-compliance with the assessment standards were directly attributed to insufficient time being provided to the assessor to undertake assessment regardless of the duration of the course.

The audits reported on the duration of the qualifications for each RTO, and indicated whether delivery timeframes varied for different client groups. The duration of training differed across the qualifications for all RTOs. The most significant variation was in the Certificate III in Aged Care, in which the duration of training varied from six (6) weeks up to 18 months. This variation in duration reflected the diversity of delivery modes. Differing durations of training and assessment and delivery modes were reported within individual RTOs.

Figure 6, illustrates variation in training duration for classroom (CR) and work placement (WP) for the Certificate III in Aged Care.

Figure 6: Certificate III in Aged Care

Illustration of some of the varying durations of classroom (CR) and work placement (WP) for Certificate III in Aged Care.

Duration	6 WEEKS	4-6 months	6 months	12 Months	Up to 18 months
	5 weeks CR	11 weeks CR	Full time CR	23 days CR	Traineeships
	1 week WP	4 weeks WP	100 hours WP	7-9 months WP	
	3 weeks CR	10 weeks CR	10 weeks CR	1 day workshops	
	3 weeks WP	3 weeks WP	9 weeks WP	6-12 months WP	
	4 weeks CR		16 weeks CR	All WP	
	2 weeks WP		3 weeks WP		
	7-14 days CR			Traineeships	
	120 hours WP				

The Certificate III in Home and Community Care is not offered by as many RTOs as the Aged Care qualification. It was therefore difficult to provide comparisons of duration for the qualification.

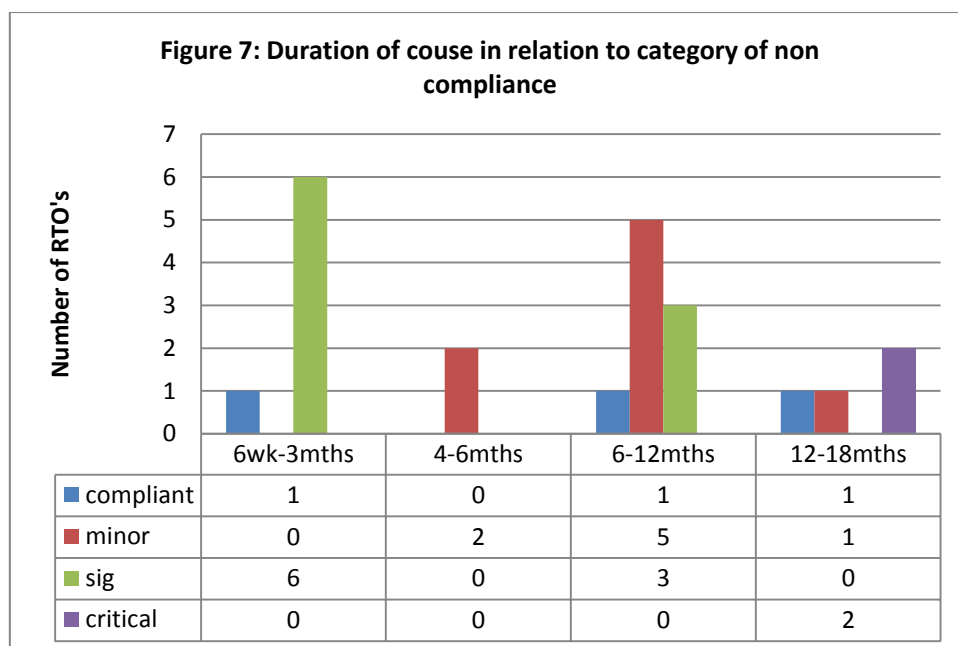
Two (2) RTOs were reported as offering the two (2) Certificate III qualifications as a dual qualification: one (1) within a six (6)-week course, the other taking up to 12 months, but with seven (7) days of classroom attendance and 120 hours of work placement. The other RTOs offered the Certificate III in Home and Community Care over courses lasting between six (6) and 18 months. The classroom components varied from single-day workshops to 23 x 5.5 hour days given over to workshops.

The Certificate IV in Aged Care was more commonly delivered through work-based, on-the-job and self-paced options. The durations reported for this qualification varied from six (6) to 18 months. This was also the case for the Certificate IV in Home and Community Care.

The majority of the RTOs in the audit sample offered varying durations, depending on whether or not the students were currently employed in the industry. Generally, the duration of training for students enrolled in the qualification(s) through a traineeship or existing worker pathway was longer than for other students.

One (1) RTO that offered training to remote aboriginal communities found that offering skill sets with the client group worked best. The qualification could take two (2) or three (3) years to complete, as the RTO had to be particularly flexible and extend the training duration to accommodate the transient and largely indigenous student group.

A review of the data was undertaken, to see whether there was a correlation between the duration of the course and the category of non-compliances.



This review highlighted the significant level of non-compliance found in RTOs delivering the Certificate III in Aged Care within a short duration. The employer survey that was conducted at the same time as the SIA confirmed widely held views that shorter training timeframes made adequate training and assessment more difficult. The employer survey (Section 6) reflected employers' views that work experience was not adequate when courses were "fast-tracked".

This review highlighted the significant level of non-compliance found in RTOs delivering the Certificate III in Aged Care within a short duration

However, the significant levels of non-compliance were not restricted to RTOs delivering in short duration, noting that findings of critical non-compliance against two (2) RTOs was in relation to traineeship delivery of 12-18 months.

5.2 Simulated Environment

The auditors reported that 15 of 18¹⁰ (83%) RTOs had simulated environments for training and/or assessment. Simulation involves replication of aspects of the workplace context in an off-the-job situation. Three (3) RTOs reportedly did not use simulation.

The degree to which the RTOs conduct training and assessment through simulation varied, as did the type of simulated environment. A number of the RTOs used simulation and role plays as preparation for the workplace. The simulations were not used as substitutes for the workplace.

Simulated environments enabled activities relating to personal care needs such as showering, bed bathing, dressing, oral hygiene, medication and mobility. In most reported instances the RTOs had rooms set up with a wet area, though one (1) did not have water.

The industry advisors who attended the site visits provided input on the appropriateness of facilities, including simulation. No RTOs were reported as non-compliant in relation to the content, design or use of a simulated environment. Non-compliances with assessment were identified in instances where a simulated environment was used however the non-compliance was attributed to other aspects of assessment rather than the specific use of the simulated environment.

5.3 Assessments in the Workplace

All RTOs audited used the outcome of assessments conducted in the workplace in making judgements about competency; however, the ways in which this aspect of assessment was incorporated into overall judgements about competency varied. Some examples of the ways that RTOs conducted and used workplace assessments are described below:

- *RTO assessors conduct the assessment, and workplace supervisors assist by providing third-party feedback, with the RTO assessor interviewing the supervisor to confirm the results;*
- *arrangements are negotiated with the facility manager and the students' supervisor (for an enterprise RTO) for the RTO assessor to undertake training and assessment on the job;*
- *the assessor doesn't visit the workplace and the RTO is not consistent in getting feedback from the workplace to form part of the evidence trail;*
- *assessments in the workplace are based on third-party reports completed by the supervisor on-site and verified by a visiting RTO assessor who conducts additional assessments and validates third-party assessment;*
- *the RTO conducts assessment in the workplace with, typically, one (1) visit that a maximum of two (2) hours which addressed all units in the qualification;*
- *the RTO relies upon self-report with third-party validation, though in one (1) workplace the third party used to verify the self-report was not on duty at the times when students were working;*

¹⁰ This information had not been provided for one (1) of the 19 RTOs at the time of reporting.

- *assessments are conducted by the RTO based on evidence received from the workplace supervisor and trainee. Trainees are observed in the workplace by the RTO when geographical logistics permit. When site visits do not occur to observe trainees, the RTO conducts interviews, views videos and consults with workplace supervisors; and*
- *where there is an online course, the workplace sends third-party reports that are reviewed by the RTO's assessor to make a judgement of competency.*

These examples support concerns about the adequacy and appropriateness of work experience expressed by the Reference Group, and raised in the Employer Survey that was conducted at the same time as the SIA

As outlined in 4.3.2, the majority of the requirements within the qualifications do not mandate where assessment takes place but use terms such as “most appropriate” and “it is recommended”. This makes it difficult for regulators to reflect that assessments are not compliant if they are not conducted in the workplace.

The connection between where assessment takes place and the validity of the actual assessment needs to be determined when requirements for these qualifications are being determined for specification within assessment requirements of units of competency.

5.4 Work Placements

The need for mandatory requirements for work placement was strongly supported through the discussions with Employers and the Employer survey and was a key issue raised in the Productivity Commission Report. The main issues identified during the audit in relation to work placements are outlined below.

- For the majority of RTOs audited, it was reported that the RTO arranges the work placements. In some cases the students were already employed with an organisation, or were undertaking the training through a traineeship or the existing worker program. One (1) RTO had a requirement that all students must be currently employed in the sector to be eligible to enrol in the qualification(s).
- The arrangements between the RTOs and employers varied; some had formal memorandums of understanding (MOU) or agreements in place; others had an informal MOU. There were instances where there were no MOUs in place to manage the relationship between the RTO and employer. At one (1) RTO where there is no formal MOU in place, the students did not experience the full range of activities and were not closely monitored by the RTO.
- It was reported that some RTOs determined the capacity of the employer to train, by undertaking facilities capacity checks. Other RTOs did not check that the workplaces provide all the required resources and activities, though the justification for approval was that the workplaces were all operational aged care facilities. Where there was no process for establishing the employer's capacity to support the training to meet the full range of requirements stipulated in the training package, the RTO was found to be non-compliant.
- Some auditors reported on the arrangements in place for students to progress from the classroom to work placements. It was specifically reported that five (5) RTOs had processes in place to ensure that students were ready to enter the workplace. Students were required to pass the classroom component and complete a specific number of assessments, or were provided with specific preparation and induction for the workplace; they were not able to commence work placements if they were not ready or had not been deemed competent in

the coursework component. Some RTOs did not have a process in place to ensure students were ready to enter the workplace.

- The support provided to students in the workplace included emails and phone (1) calls from the RTO's assessors, assignment to a more experienced worker or pairing with a 'buddy' while on placement.

The Aged Care and Home and Community Care training sector has a range of training providers, including enterprise RTOs (the organisation is the employer and RTO); RTOs delivering in organisation, private RTOs delivering on their own premises on a fee for services basis or with government funded places; publicly funded providers (such as TAFEs/State Training Providers); interstate RTOs delivering on-line and regional providers using a combination of approaches.

The above variation in patterns of work placement reflect the diversity of provider type and student/learner needs. The unit of competency descriptors do not include requirements for work experience, only workplace assessment. The request for mandatory requirements for work placement have been addressed to some degree in the draft qualifications that have been released for consultation by the CSHE Industry Skills Council.

The draft Certificate III in Individual Support Work incorporated the requirement for a minimum of 120 hours of "*direct client contact work*", there remains however, ambiguity in what "*direct client contact work*" means. If there is no further detail provided on the structure of the work placement and how it will contribute to student learning the benefits of the mandatory inclusion may be lost.

Given what employers say about the value of work experience, the connection between this and employability skills needs to be further examined. For this issue, it is most appropriate for industry training bodies such as the Industry Skills Council to engage with employers regarding what it is about work place experience that underpins quality training and assessment and incorporate this into the qualification requirements.

5.5 Language, Literacy and Numeracy Support

The auditors reported on the language, literacy and numeracy (LLN) support in place for students at each of the RTOs audited.

The majority of RTOs identified LLN requirements at or prior to enrolment, through the enrolment form, a literacy test or interviews. The RTOs had a number of different strategies to support students with LLN needs, including:

- managing students on an individual basis, without having a defined LLN process;
- providing access to LLN support courses such as the Course in Applied Vocational Study Skills (CAVSS), Course in Underpinning skills for Industry Qualifications (USIQ) and the Workplace English Language and Literacy (WELL) program;
- providing user-friendly candidate materials, face-to-face support from RTO staff, flexible and reasonably adjusted training and assessment;
- a range of learning and assessment resources to better engage with and meet learner needs, such as a comic book pictorial story of aged care;
- providing individual tutoring, mentoring, coaching; and
- referring the student to a job support agency to gain assistance with an LLN provider.

Only one (1) RTO was reported as having no structured support for students with these needs. This is a strong indication that LLN requirements are an important issue for RTOs offering Aged Care and

HACC courses. The AQTF standards require that RTOs assess and cater for the individual needs of students and the findings for the SIA indicate a high level of compliance with this standard.

While the language, literacy and numeracy (LLN) support in place for students was high, employers continue to raise concerns regarding the poor level of LLN skills displayed by some employees in the workplace. In the Employer Survey conducted at the time of the SIA employers were asked to indicate whether they found that the language, literacy and numeracy skills of new graduates in the workplace were adequate to carry out work to the required workplace levels. 41% indicated 'yes', 16% indicated 'no' and 43% indicated that it varied.

The findings of the audit against the elements of the Assessment Standard 1.5, indicate that a high proportion of RTOs are failing to adequately assess the required skills and knowledge components of the training package. In the majority of cases the assessment of communication skills is conducted within the assessment of the essential skills and knowledge.

For example, the unit *CHCICS301B Provide support to meet personal care needs* requires students to have been assessed as having the ability to:

- apply reading and writing skills required to fulfil work role in a safe manner and as specified by the organisation/service; and
- apply oral communication skills required to fulfil work role in a safe manner and as specified by the organisation.

Given the high percentage of RTOs that have been found non –compliant with being able to demonstrate how the required skills and knowledge are assessed it is probable that deficiencies with assessment are the main contributing factor to employers experiencing variable levels of LLN skills in the workplace by recent graduates.

A deeper analysis of the relationship of these LLN issues and the deficiencies reported in assessment practices will be undertaken to assess their impact on the overall quality of training and assessment outcomes in the Stage 2 follow up audits of RTOs that were deemed significant or critically non-compliant at the initial audit.

6. Audits of ASQA Registered RTOs

The Australian Skills Quality Authority (ASQA) agreed to participate in TAC's SIA's to contribute to a more complete picture of RTOs delivering Aged Care and Home and Community Care training in WA.

An ASQA RTO must ensure it complies with the conditions of registration throughout the period of its registration. These conditions can include those that apply to all RTOs registered with ASQA and are described within the National Vocational Education and Training Regulator Act 2011. ASQA RTOs must comply with the VET Quality Framework, which comprises:

- the Standards for NVR Registered Training Organisations (SNR);
- the Australian Qualifications Framework (AQF);
- the Data Provision Requirements;
- the Fit and Proper Person Requirements; and
- the Financial Viability Risk Assessment Requirements.

6.1 Audit Methodology and Sample

A representative from ASQA was on the Reference Group and assisted with the development of the risk assessment, audit methodology, tools and supporting information. This information was provided to ASQA for the use in their audits, for consistency and reporting in the conduct of the audits across both jurisdictions. The ASQA Standards selected for the SIA are outlined in **Appendix G**, where it is clear that the Standards are similar to the AQTF Standards.

All five (5) ASQA registered RTOs that participated in the audit deliver the Certificate III in Aged Care in WA, three (3) of the RTOs also offer the Certificate IV in Aged Care in WA. Two (2) of the RTOs were also audited for the Certificate III and Certificate IV in Home and Community Care.

ASQA's audit sample included one (1) RTO with a head office in WA, one (1) based in Queensland, two (2) with head offices in New South Wales and one (1) in Tasmania. While the delivery of the qualifications in WA was audited, ASQA also looked at the delivery of the Aged and/or Community Care qualifications in other states and territories during the audit process. This means that the outcome of the audit may not be isolated to or include the delivery in WA, rather it is across the RTO.

The audit of ASQA's RTOs took place between the end of January to mid-March 2013. Most of the audits included site visits to the head office location and to sites in Western Australia.

6.2 Audit Outcomes

The audits found that all of the five (5) ASQA registered RTOs in the audit sample were non-compliant with the Standards for NVR Registered Training Organisations. Of the five (5) ASQA registered RTOs:

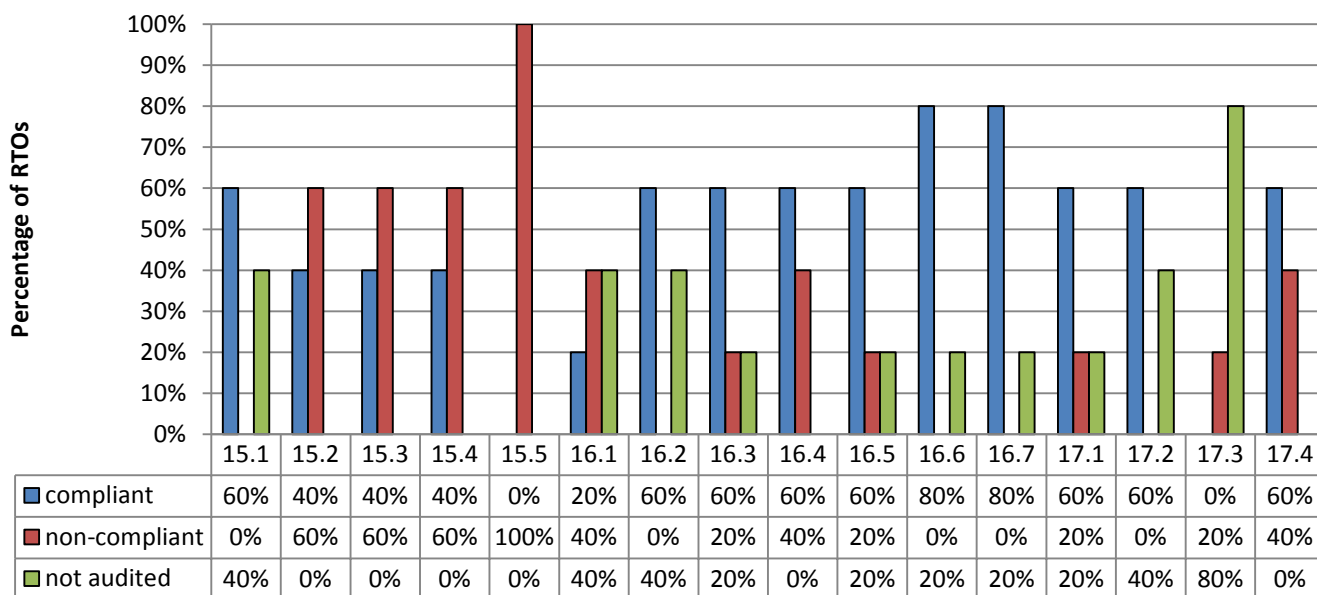
- 1 (20%) had significant non-compliances; and
- 4 (80%) were found to have critical non-compliances.

The level of significant and critical non-compliances for ASQA registered RTOs is determined in consideration of the potential for adverse impact on the quality of training and assessment outcomes for students.

Figure 8 reports on RTO compliance at the initial audit with the Standards for NVR Registered Training Organisations – Essential Standards for Continuing Registration (prior to rectification).

Figure 8: Outcome of audits from ASQA registered RTOs

*RTO compliance by Standards for NVR Registration Training Organisations
(5 ASQA registered RTOs)*



Standards for NVR Registered Training Organisations - Essential Standards for Continuing Registration

All of the ASQA RTOs audited (100%) were non-compliant in the following Standard for NVR Registered Training Organisations:

- **SNR 15.5 – Assessment, including Recognition of Prior Learning (RPL):**
 - a) *meets the requirements of the relevant training package or accredited course;*
 - b) *is conducted in accordance with the principles of assessment and the rules of evidence;*
 - c) *meets workplace and, where relevant, regulatory requirements; and*
 - d) *is systematically validated and moderated.*

Three (3) of the five (5) RTOs audited (60%) were non-compliant in the following Standards for NVR Registered Training Organisations:

- **SNR 15.2 – Strategies for training and assessment used by the NVR registered training organisation meet the requirements of the relevant training package or accredited course and have been developed through effective consultation with industry – 60% of RTOs (3) were non-compliant;**
- **SNR 15.3 – Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the Training Package or accredited course and the NVR registered training organisation’s own training and assessment strategies and are developed through effective consultation with industry; and**
- **SNR 15.4 - Training and assessment is delivered by trainers and assessors who:**
 - (a) *have the necessary training and assessment competencies as determined by the National Quality Council (NQC) or its successors; and*

- (b) have the relevant vocational competencies at least to the level being delivered or assessed; and*
- (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and*
- (d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.*

These findings are consistent with the findings outcomes of the audits conducted by TAC.

There was an overall high level of compliance against the Standards for NVR registered training organisations listed below:

- **SNR 16** – *The NVR registered training organisation adheres to principles of access and equity and maximises outcomes for its clients;*
- **SNR 17** – *Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates;*
- **SNR 20** – *Compliance with legislation;*
- **SNR 23** – *Certification, issuing and recognition of Qualifications and Statements of Attainment;*
- **SNR 24** – *Accuracy and integrity of marketing; and*
- **SNR 25** – *Transition to Training Packages/Expiry of VET accredited courses*

6.2.1 Description of Non-Compliances

The following is a summary of the non-compliances reported in relation to the above areas of non-compliance.

Assessment (15.5)

The non-compliances relating to assessment, including RPL, included:

- insufficient evidence to demonstrate that assessments are conducted in accordance with the principles of assessment and rules of evidence (equivalent to AQTF Standard 1.5b);
 - no formal direct evidence collected by RTO assessor of candidates practical skills in the workplace;
 - RTO relies on workplace supervisor report, where there was no evidence that the credentials of the workplace supervisor were validated;
 - Assessment judgements made by RTO assessor included little or no comments to support assessment outcome;
 - No evidence in student files to show that student had demonstrated competency in particular units or of evidence of assessment of practical skills, despite records indicating students had been deemed competent;
 - The trainer not having access to the workplace of the students;
 - No evidence that learners had performed the skills required over a period of time; and
 - Incomplete assessment records in student files.
- insufficient evidence to show that assessment is systematically validated (equivalent to AQTF Standard 1.5d)

- evidence of validation however it was not contextualised for the qualification (i.e. units of competency that are used in both aged care and home and community care);
 - evidence of validation did not match statements within training and assessment strategies;
 - validation records were not consistent with RTOs process;
 - author of resources also conducted validation activities of same resources; and
 - validation activity only mapped to written assessment activities and did not include practical assessments.
- Assessments conducted through a partnership arrangement (one (1) RTO) in a particular WA location required clarification through the rectification period as: there was no RTO trainer for students; it was not clear who had completed the written tasks and if so who marked the assessments; it was not clear how often the visiting RTO assessor attended to observe practical skills; and it was not clear where the practical assessment was to be conducted.

Trainer and Assessor Competencies (15.4)

Three (3) RTOs had non-compliances reported against the competencies of the trainers and assessors. Two (2) of the RTOs were found to be non-compliant in regards to insufficient evidence of the qualifications, vocational currency and experience of individual trainers, which was not identified as a systemic issue.

One (1) RTO did not provide sufficient evidence to demonstrate that it had verified the credentials, experience and professional development activities of its trainers or had a process in place to ensure trainers continued to develop their VET knowledge and skills as well as their industry currency and trainer/assessor competence.

Staff, Facilities, Equipment and Training and Assessment Materials (15.3)

The access to required equipment and appropriate workplaces were reported as non-compliances against this Standard for three (3) RTOs.

It was identified that two (2) RTOs did not have a simulated environment for use during the training component, to give students in WA the opportunity to develop practical skills prior to the work placement.

One (1) RTO did not provide sufficient evidence that it ensures the students' workplaces are appropriate for the qualification being delivered and meet current industry requirements.

There was an instance reported that the training for a particular course (not in WA) was being delivered around the dining table in the home of one (1) of the students once a month.

Strategies for Training and Assessment (15.2)

Non-compliances were reported against this standard for three (3) RTOs. Errors were identified in the strategies at one (1) RTO, affecting the clarity of the documents.

The formal documentation presented at the other two (2) RTOs did not consistently reflect the training and assessment programs provided; did not contain sufficient detail as to the assessment methods being used; and conflicted with advice provided by other parties such as aged care facilities managers and trainers.

In the one (1) instance of Aged Care program being delivered in WA through a partnership agreement, the RTO could not clarify contradictions in the training and assessment strategies provided by the partner organisation. This was also reported as a non-compliance in Standard 17.3 *The NVR registered training organisation monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework.*

6.2.2 Additional Areas of Focus

Duration of Training

The duration of training course varied across the five (5) RTOs audited - 10 weeks, which included 12x8 hour shifts in an aged care workplace; 14 weeks with 1-2 sessions a week; 12 weeks theory plus 120 hours' work placement; 10 sessions over 10 months (currently employed) or 12 months full time on-the-job.

One (1) RTO catered for the needs of indigenous students in WA.

Simulated Environment

Two (2) of the RTOs conducted all training and assessment in the workplace, therefore did not have the need for a simulated aged or community care environment.

For delivery in WA, two (2) RTOs had basic simulated environments for practice prior to commencement in the workplace. However, one (1) of these RTOs had the environment in one (1) location, but students in a second location did not have access to a simulated environment.

The fifth RTO did not have a simulated environment for its regional delivery and proposed to take the students to a facility for two (2) days prior to their work placement.

Assessments in the Workplace

It was reported that four (4) RTOs conduct assessments in the workplace. In two (2) cases, the RTO assessor visits the workplace. In the other two (2) RTOs, the RTO relies on the third party (workplace supervisor's) reports to assess the practical workplace skills.

One (1) RTO advised that it could not assess in the workplace as the students were home and community care workers, so the practical assessment was conducted in the simulated workplace.

Language, Literacy and Numeracy Support

Three (3) of the RTOs reported that they identified any LLN needs prior to or during the enrolment phase, though there was not consistent evidence of the implementation of this at two (2) of the RTOs.

7. Employer Survey

A survey of employers in the aged care and community care industry was conducted, to seek feedback on employer satisfaction with the training provided to students in the aged care and home and community care qualification(s). The survey sought information on:

- how satisfied employers are with the way the training is offered and the experience students receive;
- the arrangement the employer has with the RTO, and whether the employer is required to assess or verify the on-the-job assessment evidence;
- employers' opinions on the ability of recently graduated students to meet industry requirements; and
- general comments on qualifications, training, experience or perceptions, as employers in the sector.

The questions were administered through a voluntary online survey at the same time as the audits were being conducted. The invitation to participate was emailed to employers with current indentured Aged Care and/or Home and Community Care trainees. The Reference Group members also assisted with the distribution and promotion of the survey to their interested stakeholders. A copy of the survey is shown as **Attachment 2**.

7.1 Survey Response

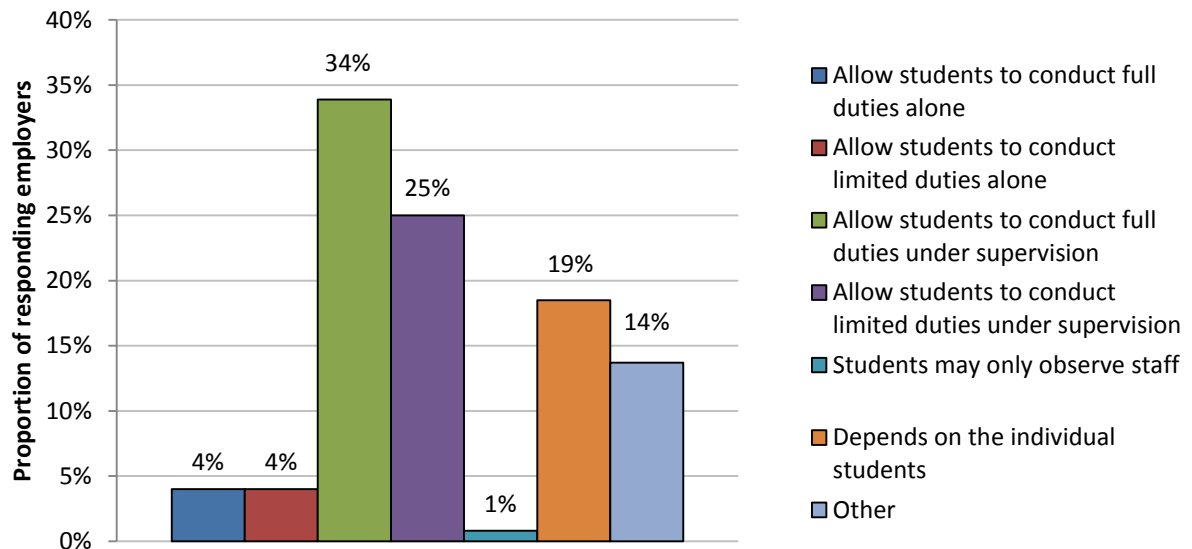
187 responses were received from employers. The key results are outlined below, with more comprehensive details provided in **Appendix H**.

- 40% of the respondents are in the Community Care sector; 31% in residential Aged Care; and 25% in both areas.
- 81% of the respondents had students at their facility/organisation at the time of audit (including own staff and external work placement students).
- The majority of the respondents that had students at the time of the survey had fewer than 10 students; the majority of these students were enrolled in the Certificate III in Aged Care.
- 57% indicated that the organisation/facility had a formal written agreement or memorandum of understanding with the training provider; 9% did not have any formalised arrangements in place.
- 54% of 130 respondents indicated that both the RTO and the facility/organisation assessed students who were on work placement in their facility; 28% indicated that it was the RTO's responsibility; 15% stated that it was the facility/organisation's responsibility; and 4% were unsure.
- 30% of the respondents (123) to this question indicated that they signed off assessments as the assessor. 68% indicated they signed off on log books or other training records; 51% signed off as verification of work; 56% stated that they observed the students; and 10% had no input in the assessment of the students. This was dependent on the role of the person completing the survey.
- In response to identifying some of the tasks the students could do on work placement, the list of tasks provided was varied and included just about everything that could be done (1):

cleaning, feeding, serving meals, assistance with meal preparation, talking to clients, making tea and coffee, showering, manual handling, personal care. **Figure 9** below shows the range of duties that employers allowed work placement students to undertake.

Figure 9: Duties for work placement students

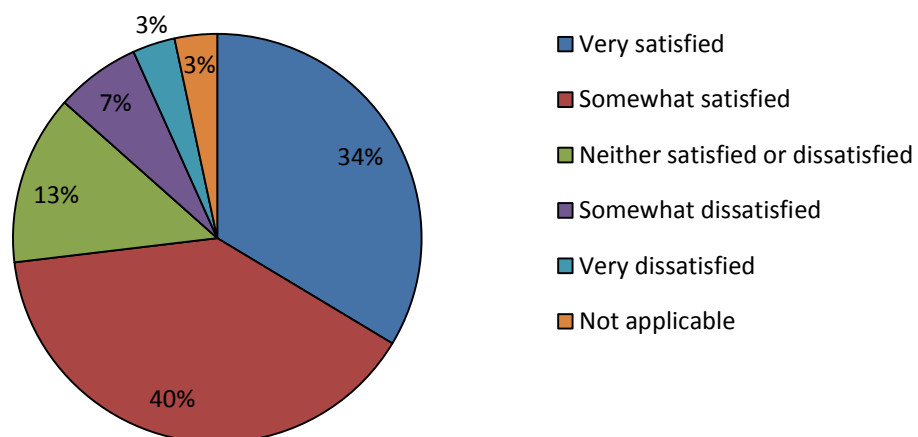
Range of duties that employers allow work placement students to undertake



- Employers were asked about their satisfaction with the level of support from the RTO. **Figure 10** shows that 74% of the 119 employers who responded to this question were either somewhat or very satisfied with the level of support they receive from the RTO.

Figure 10: Level of satisfaction with support from RTO

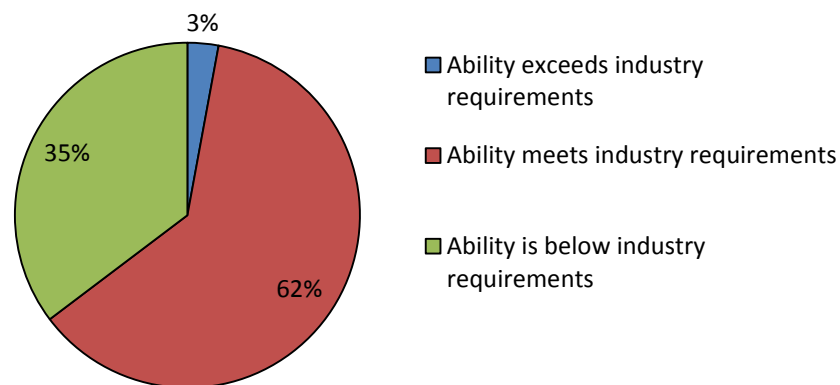
Level of satisfaction with the support the organisation/facility receives from the RTO/training provider



- Employers were asked about the support arrangements in place within their facility/organisation for the students. 77% indicated that supervisors and senior staff are available for students to contact; 74% have a buddy; 39% provide mentors; and 56% indicated that someone (1) from the RTO is available for students to contact.
- From the employer's perspective, the majority of respondents (62%) rated the overall ability of recent graduates of Aged care and/or Community Care sectors to understand the requirements of their role and work effectively in industry as meeting industry requirements, as illustrated below in **Figure 11**.

Figure 11: Ability to work in the industry once qualified

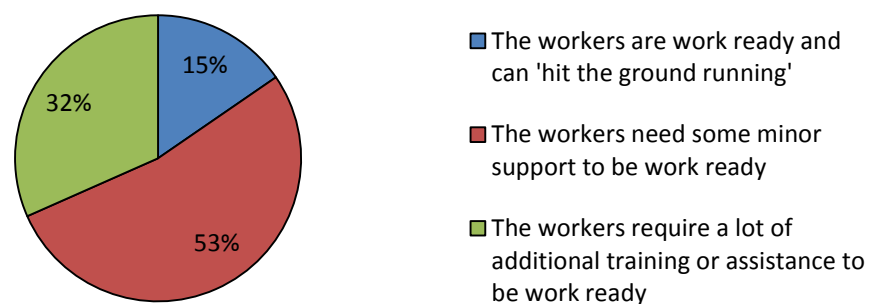
Employer response to staff new to the industry who have recently graduated with a Certificate in Aged Care or Home & Community Care



- 49% of employers indicated that they believed students were receiving the full range of training and work experience they need during their course to prepare them to work in the industry, while the remaining employers selected "no" to this question.
- 53% of respondents indicated that "the workers need some minor support to be work ready". **Figure 12** depicts the experience employers have with workers who have recently finished training and received their Certificate III in Aged Care or HACC qualification.

Figure 12: Employers' experience with recently qualified workers

Employers' experiences with recently qualified workers in Aged Care and Community Care qualifications



- Employers were asked to indicate whether they found that the language, literacy and numeracy skills of new graduates in the workplace were adequate to carry out work to the required workplace levels. 41% indicated "yes", 16% indicated "no", and 43% indicated that it varied.

7.2 Additional Comments in the Survey

The survey allowed respondents the opportunity to provide additional general information about their experience or perceptions, as employers, of staff with the qualifications being audited. The survey allowed for comments on areas including the Aged Care and HACC qualifications or Community Services Training Package, Registered Training Organisations, the training system, and general comments and suggestions or improvements relating to Aged Care/HACC training in WA.

Employer responses to the open questions asked in the survey were inter-related. Workplace experience was mentioned in the majority of responses in relation to:

- the adequacy of work experience, in particular whether a sufficient range of experiences is provided;
- whether in some of the "fast-tracked courses" there is adequate time for work experience; and
- the need for greater consistency in what constitutes work experience, and its duration.

Many comments showed that employers were satisfied with their RTO. However, others mentioned variability in the quality of delivery by RTOs.

Regional employers commented on the difficulty they had observed RTOs having in obtaining and retaining staff who were appropriately qualified to train students.

The need for the inclusion of continence management in care training was noted by a number of employers. It was also suggested that training for aged care and HACC should be designed more generically as "care training", with specialisations in areas such as aged/community/disability, etc.

Other suggestions included more training on cultural awareness and age-specific issues.

The respondents worked in a wide range of roles within the organisations, including:

Administrators	Aged care Coordinators Area Team Leader	Assistant Coordinators
Care Managers	CEOs	Clinical Nurse Educator/managers
Community Services Coordinators	Corporate Services Manager	Director of Nursing
Day Therapy Manager	Employee Liaison	Facility managers
Hostel Administrator	Human Resource Managers	Learning and Development Consultant
Manager	PA to CEO	Program Managers
Quality System Manager	Residential Care Manager	Skills Coach

8. Post-Audit Follow Up

8.1 TAC Registered RTOs

In order to maintain registration, RTOs must be fully compliant with the AQTF Essential Conditions and Standards for Continuing Registration. The Council's processes provide RTOs found non-compliant at audit with an opportunity to rectify non-compliances within 20 working days.

To be deemed compliant RTOs must provide evidence to show how they have addressed the reported non-compliance(s). The RTO has the discretion on how it presents the evidence. The evidence is reviewed by the auditor to determine if the non-compliance(s) have been addressed, and that, if the future provision of training and assessment services is undertaken in the way described in the evidence, then quality outcomes for learners should be achieved.

Where non-compliance remains after the rectification period, the matter is referred to the Council for further consideration and action. This action may include sanctions such as suspension and cancellation.

The following summarises the RTOs' compliance following this rectification period.

- **Of the seven (7) RTOs that had minor non-compliances**, five (5) were able to demonstrate compliance within the rectification period. The remaining two (2) RTOs had minor non-compliances remaining after the initial rectification period and subsequently addressed the issues.
- **Five (5) of the eight (8) RTOs that had significant non-compliances** were able to address the issues within the rectification period. Of these, two (2) still had significant non-compliances remaining after this time and one (1) RTO had minor non-compliances. Whilst two (2) of these RTOs have subsequently demonstrated compliance with the AQTF Standards, one (1) RTO, with significant non-compliances remaining had their registration cancelled by the Council.
- **The two (2) RTOs found to have critical non-compliances** at audit demonstrated compliance within the rectification period. One (1) of these RTOs removed the new version of the Certificate III in Aged Care qualification from the concurrent renewal of registration application, effectively addressing the non-compliances to finish the course for the existing students, but not transitioning and continuing Aged Care delivery.

Given the number of RTOs found to be significant and critical non-compliances monitoring audits will form an important part of the SIA. The purpose of monitoring audits is to ensure that rectification action is implemented as described and that the RTO continues to comply with the AQTF Standards for Continuing Registration.

For the three (3) RTOs that removed the qualification(s) prior to the SIA and therefore were not audited, the risk of the RTOs later applying to add the qualifications back on is mitigated by the ongoing risk management process for registration which includes mandatory site visits due to the high risk nature of the qualifications.

8.2 ASQA Registered RTOs

At the time of writing of this interim report, the outcomes of the rectification actions from the audits conducted of all of the ASQA RTOs were not available. The final outcomes of the ASQA audits will be included in the final report.

9. Conclusion and Recommendations

The major impetus for the Council's undertaking of this SIA was the recommendations arising out of Australian Government's Productivity Commission Inquiry Report "Caring for Older Australians", including that the Government undertake an independent and comprehensive review of aged care-related VET courses and their delivery by RTOs.

Two (2) of the issues that the recommendation identified specifically were:

- *examining current practices that may be leading to variability in student outcomes, including periods of training and practicum; and*
- *reviewing procedures to ensure that VET trainers and assessors possess required current practice knowledge.*

These two (2) issues are directly related to the role of TAC as a VET regulating body and were encompassed within the objectives of the SIA:

1. determine the level of compliance with the Australian Quality Training Framework (AQTF) Essential Conditions and Standards for Continuing Registration of RTOs delivering nationally recognised Aged Care and Home and Community Care qualifications;
2. identify and analyse key areas of compliance and non-compliance with the AQTF Essential Conditions and Standards for Continuing Registration for RTOs delivering the above qualifications;
3. identify key issues impacting on training and assessment outcomes and good training and assessment practice in the Aged and Community Care sector;
4. comment on whether there are systemic issues which impact on the delivery of training and assessment services for qualifications in the Aged and Community Care sector; and
5. recommend strategies to address key issues and to improve the quality of training and assessment for qualifications in this industry area and future audit processes.

The audit has gone (1) some way to improving the quality of training and assessment as all providers have been required to amend their delivery and assessment to meet the requirements of the training package and the AQTF Standards in order to continue to be registered as an RTO.

This conclusion provides comment on each of these objectives as well as recommendations relating to the other specifics of the Productivity Commission's Report which whilst related to TAC's role are not encompassed within an audit of an RTOs compliance with the AQTF.

- *Identifying whether regulators are adequately resourced to monitor and audit RTOs using a risk-based regulatory approach and have appropriate enforcement regimes that allow for appropriate and proportional responses to non-compliance by RTOs*
- *Identifying reforms to ensure students demonstrate pertinent competencies on a more consistent basis.*

9.1 Audit Objectives

9.1.1 Outcomes

RTOs identified as being significantly or critically non-compliant were found to have the majority of non-compliances in relation to assessment. Significant non-compliance indicates that training and assessment systems are not sufficiently focussed on quality training and assessment outcomes. This therefore indicates that learners are not achieving competencies as specified by the qualification. Eight (8) RTOs were found to have significant non-compliances at the initial audit.

Critical non-compliance means there is a critical adverse impact on learners and/or consumers of goods and services produced in the training environment or current (or future) workplaces. Two (2) RTOs were deemed to be critically non-compliant, which meant that their training and assessment systems were not achieving quality training and assessment outcomes.

The findings of the SIA are, that at the time of the initial audit, the majority of RTOs did not have in place the assessment tools or strategies to satisfy TAC that assessments were valid or that competencies were assessed reliably, consistently or in accordance with the requirements specified in the units of competency. This supports the Productivity Commission’s concerns about the variable outputs in Aged Care training.

9.1.2 Analysis of Compliance

An analysis of the non-compliances identified that the highest levels of non-compliances, especially for those RTOs found to be significant or critically non-compliant, were related to assessment, in particular Standards 1.3, 1.5b and 1.5c.

Standard 1.3 requires that:

“staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO’s own training and assessment strategies”.

This AQTF standard focuses on the equipment and the actual materials used for the training and assessment process.

The high level of non-compliance found with this standard implies that it is not only how assessment is conducted that has an impact on non-compliance, but that the materials and equipment used for both training and assessment are contributory factors.

This industry area, like many in the VET sector, relies heavily on commercially produced training and assessment materials. These materials are marketed as meeting the requirements of specific units, however, a judgement about whether these off the shelf materials enable training and assessment to meet the requirements for the qualification or allow for compliance with AQTF is something each individual RTO must assess for each unit.

The recent review of Training Package Standards focussed on improvements to the specification of the benchmarks for assessment. These initiatives are currently being implemented with Training Packages now meeting the revised standards. However, the more recent “VET Quality Project” report produced by The Allen Consulting Group is proposing additional quality measures be into training package development. The proposed measures include learning resources. The findings of this SIA indicate that improvement to quality in VET sector will depend, not only on inclusion of advice on learning resources into the training package materials, but on improvements in the quality

of the learning resources. In particular, whether they adequately meet the requirements of training package and support compliance.

Standard 1.5b requires that:

“assessment, including recognition of prior learning (RPL), is conducted in accordance with the principles of assessment and the rules of evidence”.

The principles of assessment include validity and reliability. If assessments are not valid or reliable this also indicates that the assessment tools used were not actually assessing the intended outcomes of the unit of competencies. Therefore participants would not have the skills and knowledge deemed necessary by industry to undertake the occupations covered by the SIA.

Standard 1.5c requires that:

“assessment, including recognition of prior learning (RPL), meet workplace and, where relevant, regulatory requirements”.

As outlined in Chapter 4 the non-compliances against this standards were substantially related to issues of the gathering of evidence to make judgements about assessments undertaken in the workplace. The deficiencies in this area cast doubt about the sufficiency and authenticity of evidence used to make judgements about assessment practices.

The NSSC Standards Policy Framework ‘Improving Vocational Education and Training – The Australian Vocational Qualifications System’, proposes that minimum changes are required to the Standards relating to assessment. Based on the findings of the SIA, the current RTO Standards do not provide a level of clarity for RTOs on the aspects of the training package that must be complied with and Training Package requirements do not provide regulators with the scope to appropriately assess all dimensions of the quality of assessment.

Standard 1.4b

The Productivity Commission’s concerns about the procedures to ensure that VET trainers and assessors possess required current practice knowledge is related to AQTF Standard 1.4b, which requires that training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed.

It is significant that the SIA found that nine (9) RTOs were not able to demonstrate how the vocational competency of its nominated trainers and assessors had been established. The audit reports indicated that there was no evidence of systematic processes to determine how trainers demonstrated the vocational competency for the qualification they were delivering, the trainer held superseded versions of the qualification, or the matrix the RTO was using to demonstrate equivalence did not have sufficient information.

The level of non-compliance with assessment requirements indicates that systemic issues with assessment exist within the Aged and Community Care training sector. In conjunction with the high number of RTOs that were not able to demonstrate vocational competency of their nominated trainers and assessors, there is a significant risk that learners are not actually achieving the competency as specified in the qualifications.

9.1.4 Other Factors Influencing the Quality of Assessment

The high level of compliance by RTOs with Standard 1.4a - *Training and assessment is delivered by trainers and assessors who have the necessary training and assessment competencies as determined*

by the National Quality Council or its successors – did not positively correlate to a high level of compliance with assessment requirements. Reports from the audits undertaken consistently identified that trainer and assessors were not applying the principles of assessment or rules of evidence when undertaking assessments.

“Although the nominated trainers have training and assessment qualifications, their actions of judging competence and recording judgements before all evidence has been collected doesn’t demonstrate that they understand the assessment process and therefore have the necessary training and assessment competencies “ TAC Auditor.

This finding raises potential issues relating to the suitability and quality of delivery of the TAE40110 Certificate IV in Training and Assessment (TAE) as the minimum qualification to be held by trainers and assessors. The fact that the majority of RTOs are able to present compliant assessment frameworks within the 20 days rectification period indicates that the level of knowledge required to be able to implement compliant systems is either already held within the organisation or being imported into the organisation from external sources.

The audit findings and interviews with RTOs indicated that increased pressure by industry to deliver in reduced timeframes and cut costs to make training attractive to students were contributing factors to the RTO failing to operate in compliance with the standards.

Further investigation may be required in a range of areas including:

- scrutiny and monitoring of providers delivering the TAE qualification;
- scrutiny of the fitness for purpose of the TAE including examination of whether the appropriate mandatory units are stipulated in the qualification; and
- further assessment by the Community Services and Health Industry Skills Council of the cost and appropriate duration required for qualifications in the Aged and Community Care sector and the ability of industry and employees to pay for the level of training prescribed.

In the NSSC Standards Policy Framework ‘Improving Vocational Education and Training – The Australian Vocational Qualification System’ the NSSC states that they consider that, when trained and assessed well, the Certificate IV in Training and Assessment is an appropriate minimum qualification for vocational education and training. The Standing Council on Tertiary Education, Skills and Employment has now endorsed the NSSC policy framework which will effect increased regulatory requirements for providers delivering the TAE.

While the Council has supported the approach of the NSSC to focus on increasing the scrutiny and monitoring of providers that deliver the TAE, it considers that further evaluation of whether the most appropriate mix of mandatory units are prescribed in the qualification is required.

In addition, the most appropriate qualification available will not necessarily result in improvement to the system if the factor at play is the competing interests of quality and the cost and duration of training. Further examination of these competing interests are required in the Aged and Community Care sector where economic realities mean government, employers and students may not be prepared or able, to pay a premium for training.

9.1.4 Additional Areas of Focus

As discussed in Chapter 5 the Reference Group for the SIA raised specific issues that they identified as areas of concern for the Western Australian Aged Care Industry. These related to training delivered in what was seen as “short duration”, whether simulated assessments were sufficient, whether workplace experience of learners was adequate to prepare them for work in the industry and the adequacy of language and numeracy skills.

Duration - The audit assignments required that auditors comment on the duration of training and assessment of the RTOs being audited. The SIA found that significant or critical levels of non-compliance were not exclusively attributed to a particular duration of training. In many cases, the audit highlighted that non-compliances with the assessment standards were directly attributed to insufficient time being provided to the assessor to undertake assessment regardless of the duration of the course.

However, a review of the data on course duration was undertaken and highlighted a significant level of non-compliance found in RTOs delivering the Certificate III in Aged Care within a short duration. In addition the employer survey confirmed widely held views that shorter training timeframes made adequate training and assessment more difficult and there was a high level of concern that lower quality outcomes were achieved.

The drivers for short duration delivery include pressure from employers to train employees as quickly as possible and pressure to delivery within a cost structure that is attractive to students and employers. Often there are also additional incentives to increasing completions influenced by public funding arrangements in high priority skill areas.

The audit report for one (1) RTO which was delivering all four (4) qualifications in short durations noted “there was no observation checklist for simulated workplace activity and workplace experience was not assessed”. In another case where delivery was over a short time frame, the audit reported that “..the assessment process did not verify that each student had demonstrated each required element of competency and each required skill from each unit of competency in the workplace”.

One (1) RTO was able to demonstrate that they were fully compliant with the AQTF when delivered in a period of less than three (3) months. The RTOs delivery model was supported by supplementary training in language, literacy and numeracy and provided for very small trainer/student ratios due to supplementary grant funding received by the RTO. This demonstrated that the qualification could be adequately delivered and assessed within the short timeframe in a high resource delivery mode.

Current deficiencies in the Standards for RTOs make the assessment of non-compliance due to insufficient timeframes difficult within a competency based assessment framework.

To address the issue of short duration courses within the competency based assessment framework, the NSSC may wish to investigate the alignment of specific requirements within the Standards for RTOs that explicitly require RTOs to demonstrate how timeframes for assessment are able to meet the needs of the individual client group.

The audit did highlight the significant level of non-compliance found in RTOs delivering the Certificate III in Aged Care within a short duration; however significant levels of non-compliance were not restricted to RTOs delivering in short durations.

Simulated environments - The Reference Group was also concerned that anecdotal information had suggested that participants in aged and community care training were ill prepared for workplace duties due to crucial activities such as handling of patients being undertaken by **simulation**. While significant issues with assessment were identified, the SIA did not find that simulation of assessment

alone was an issue that was related to non-compliance with standards relating to assessment. No RTOs in the audit sample were reported as using only simulated assessment but a combination of simulation and on the job assessment.

It is likely that concerns raised about assessment in a simulated environment relate more directly to the outcomes that are experienced when the student has not been assessed appropriately, regardless of the assessment environment; this was highlighted throughout the audit. The lack of requirement for work placements to be undertaken in addition to assessments being undertaken within a simulated environment are likely to contribute to a graduate requiring additional assistance at the commencement of their employment.

Requirements within the qualifications do not mandate where assessment takes place but use terms such as “most appropriate” and “it is recommended”. For the majority of units, the words “must be assessed” are not used. Auditors are therefore only able to make a judgement about whether the assessments met the requirements of the AQTF, with the issue of appropriateness of simulation as an assessment practice being outside the scope of the audit.

Additional focus on mandated assessment in the workplace in the training package and the inclusion of mandatory work placement requirements will go some way to alleviating concerns regarding the use of simulated environments.

The SIA did not find that simulation of assessment alone was an issue that was related to non-compliance with standards relating to assessment.

Work placements and on-the-job experience were raised by the Reference Group as areas for the audit to examine in relation to work readiness. The Employer Survey (Chapter 6) also included comments about the adequacy of work placements for learners and that some level of exposure to the workplace is an important aspect of employability skills.

All RTOs audited were providing opportunities for work placements, whether organised by the RTO or the learner themselves. However, as the four (4) qualification descriptors for the courses that formed part of the audit did not provide parameters or standards in relation to workplace experience which could be used as benchmarks for auditors.

The need for mandatory requirements for work placement was strongly supported through the discussions with Employers and the Employer survey and was a key issue raised in the Productivity Commission report.

The Community Services and Health Industry Skills Council (CSandHISC) is currently reviewing and streamlining the Community Services Training Package, which includes the Aged Care and Home and Community care qualifications and has released the first draft qualifications for comment. Units of Competency are being re-written to meet the new Standards for Training Packages. The qualifications within this package currently being re-developed now have and specified duration for work experience built into specific units.

The draft Certificate III in Individual Support Work incorporated the requirement for a minimum of 120 hours of “*direct client contact work*” There remains however, ambiguity in what “*direct client contact work*” means. If there is no further detail provided on the structure of the work placement and how it will contribute to student learning the benefits of the mandatory inclusion may be lost.

Given what employers say about the value of work experience, the connection between this and employability skills needs to be further examined. For this issue, it is more appropriate for industry training bodies such as the Industry Skills Council to engage with employers regarding what it is about work place experience that underpins quality training and assessment and incorporate this into the qualification requirements.

The audit found that the need for mandatory requirements for work placement was strongly supported.

Language, Literacy and numeracy -both the Reference Group and the responses to the employer survey raised concerns that language, literacy and numeracy skills of workers in the Aged care industry were in many cases not adequate to meet professional standards. The current AQTF Standards require that language, literacy and numeracy support is provided to learners (Standard 2.5: Learners receive training, assessment and support services to meet their individual needs). Therefore the findings in the audit reports specifically in relation to language, literacy and numeracy were in regard to the support available or provided to learners.

Required language levels are not assigned for the qualifications audited. However, language, literacy and numeracy are essential skills that underpin many of the units in the four (4) qualifications audited. As essential skills are required to be assessed as part of the overall assessment strategy it could be inferred that a lack of overall quality in assessment leads to the question of whether these skills are being adequately assessed.

A deeper analysis of the relationship of these LLN issues and the deficiencies reported in assessment practices will be undertaken to assess their impact on the overall quality of training and assessment outcomes in the Stage 2 follow up audits of RTOs that were deemed significant or critically non-compliant at the initial audit.

Given the high percentage of RTOs that have been found non –compliant with being able to demonstrate how the required skills and knowledge are assessed it is probable that deficiencies with assessment are a contributing factor to employers experiencing variable levels of LLN skills in the workplace by recent graduates.

9.1.5 Key Issues

Two (2) key issues have been identified through the audit process:

- the impact of the lack of quality of assessment outcomes across all of the four (4) qualifications audited, which appears to be a systemic issue; and
- the limitations of the current training and regulatory system for addressing, through the AQTF audit process, the issues raised by industry and employers, such as short duration of delivery, work placement, and language, literacy and numeracy, due to lack of specificity in training package qualification descriptions and the AQTF Standards.

The Council has developed specific recommendations to improve the quality of training in the Aged and Community Care sector.

9.2 Recommendations

The following section recommends strategies to address key issues and to improve the quality of training and assessment for qualifications in this industry area and future audit processes.

9.2.1 Monitoring and Ongoing Audits

The audit process which is applied to meet national guidelines allows RTOs the opportunity to rectify non-compliances within a 20-day timeframe.

As previously described in Chapter 8 monitoring audits are often undertaken following audits where significant or critical non-compliance is found at the audit even though rectification evidence is

judged to be adequate to assume that, once fully implemented, the RTO will be operating in compliance with the AQTF. This is congruent with the risk-based approach to regulation.

It is recommended that Stage 2 of the SIA – Monitoring, be implemented within six (6) months to assure the Aged and Community Care industry that the rectifications had been fully implemented and the RTOs continue to comply with the AQTF Standards for Continuing Registration.

The monitoring audits should focus on assessment practices; in particular those identified as systemic issues, and examine the effective implementation of rectification actions

Recommendation 1

The TAC to undertake monitoring audits within six (6) months of all RTOs that were found to have significant or critical non-compliances in the strategic industry audit. These audits will focus on assessment and implementation of rectification actions.

9.2.2 Audit Program

The significance of the systemic issues identified by the SIA and the high risk nature of Aged Care Training in that it involves both direct patient care with vulnerable communities lead to a recommendation that TAC make the determination that the four (4) qualifications are deemed high risk for the purposes of TAC's audit program.

Recommendation 2

The TAC to ensure that RTOs audited for the current or revised Aged Care and/or Home and Community Care qualifications, including all new applications, are subject to a site audit, with industry advisors in attendance where possible.

9.2.3 Use of Industry Expertise

The SIA trialled the use of industry experts in aged and community care for all audits, where possible, and auditors reported that this increased their understanding of industry issues relevant to training.

The Reference Group was also supportive of industry contributing to the regulatory process in this way, and determined that it would be possible for the peak bodies in the aged and community care sector to develop a list of experienced and appropriately qualified industry experts to continue to assist TAC with its audit program.

In particular, the information provided by the Reference Group and other stakeholders, including industry advisors, adds value to the way that TAC regulates by making possible a more informed process. It is therefore crucial that TAC builds on the SIA process and establishes, with stakeholders, on-going methods of accessing industry knowledge and expertise.

Recommendation 3

The TAC to develop formal arrangements with peak industry bodies in the Aged and Community Care sector for the ongoing provision of industry advisors for Australian Quality Training Framework (AQTF) audits in this industry.

9.3.4 Work Experience/Work Placement

One (1) of the key issues that arose from the SIA process was the limitations of the current training and regulatory system to address, directly through the AQTF audit process, the issues raised by industry and employers, such as short duration of delivery, work placement, and language, literacy and numeracy. This is largely, due to lack of specificity in training package qualification descriptions and the AQTF Standards.

As discussed in detail in Section 5, auditors can only make judgements about compliance of training and assessment in relation to the specifications of the competencies.

The findings of this SIA confirm the need to strengthen assessment measures in qualifications. The SIA reported poor assessment and evidence-gathering practices in relation to third party evidence from the workplace, including vocational competency of the third parties and lack of records of practical assessments in the workplace.

The SIA found that RTOs based judgements about a learner's competency on the outcomes of assessments conducted in the workplace; however, poor practices at some RTOs cast doubt on the validity, sufficiency and authenticity of the assessments. Overall, the SIA highlighted a need for greater specification of work placement and assessment arrangements and conditions, including the scope of work to be undertaken and supervisory responsibilities.

Issues such as the length of time required for acquisition of competency, and standards for work placement, are not part of these specifications, despite the fact that both are viewed by industry as contributing to the overall quality of training.

It is strongly recommended that any assessment measures incorporated into qualifications provide sufficient detail to enable RTOs and regulators to have a clear understanding of what is required to ensure assessment validity, sufficiency and currency.

Recommendation 4

The TAC to provide the Stage 1 findings of the SIA report to the Community Services and Health Industry Skills Council for consideration in the current review of the national training package, highlighting:

- **The draft Certificate III in Individual Support Work incorporates the requirement for a minimum of 120 hours of “ direct client contact work”, there remains however, ambiguity in what “direct client contact work” means. If there is no further detail provided on the structure of the work placement and how it will contribute to student learning the benefits of the mandatory inclusion may be lost.**
- **The connection between where assessment takes place and the validity of the actual assessment needs to be determined when requirements for these qualifications are being determined for specification within assessment requirements of units of competency.**

- **Further assessment of the cost and appropriate duration required for qualifications in the Aged and Community Care sector and the ability of industry and employees to pay for the level of training prescribed.**

9.3.5 Standards for Work Placements

The Community Services, Health and Education Training Council is funded by the WA Government to provide a leadership role in promoting the training industry, including partnerships between industry and the training sector. It would be appropriate for this body to investigate the industry/employer concerns relating to the role of work experience, as opposed to assessment in the workplace, and develop criteria or standards identifying the responsibilities of various parties and the expected outcomes of work experience. This work could build on changed requirements for units of competency that the CSandHISC implement as part of their review and streamlining of the current qualifications.

Recommendation 5

The TAC to request the Community Services, Health and Education Industry Training Council to investigate and develop standards/criteria relating to the organisation of work placements for students and RTOs with respect to the Aged Care and Home and Community Care qualifications.

9.3.5 Implications of SIA in Aged Care and Home and Community Care for the Review of the Standards for the Regulation of VET

The limitations of the current training and regulatory system in investigating and addressing industry's concerns relating to short duration of delivery, work placement, and language, literacy and numeracy have been noted. The SIA found that RTOs based judgements about a learner's competency on the outcomes of workplace assessments. However, the poorly managed work placement arrangements, and the resulting poor assessment and evidence gathering practices associated with workplace evidence identified at audit seriously undermine the reliability of workplace assessment.

These findings confirm the need to strengthen assessment measures in qualifications to specify work placement and assessment arrangements and conditions, including the scope of work to be assessed during work experience. It is highly recommended that assessment measures provide sufficient detail to enable RTOs and regulators to gain a clear understanding of what is required to ensure that assessment, whether simulated or in the workplace, enables assessment validity, sufficiency and currency. The Allen Consulting Group Report on the VET Quality Project has instigated a national discussion and consideration of this issue.

Recommendation 6

The Training Accreditation Council to forward the findings from the Strategic Industry Audit of Aged Care and Home and Community Care qualifications in Western Australia, Interim Report to the National Skills Standards Council, to inform the development and implementation of the standards applying to vocational education and training.

It is recommended that the NSSC give consideration to:

- **providing a level of clarity for RTOs in the RTO Standards on the aspects of the training package that must be complied;**

- **ensuring that through the quality assurance process; the level of detail regarding assessment requirements provide regulators with the scope to appropriately assess all dimensions of the quality of assessment;**
- **addressing the issue of short duration courses within the competency based assessment framework by investigating the inclusion of a requirement for RTOs to explicitly demonstrate how timeframes for assessment are able to meet the needs of the individual client group; and**
- **undertaking further evaluation, in conjunction with Innovation and Business Skills Australia (IBSA) of the appropriateness of the mandatory units of the TAE40110 to ensure assessors have the required competency to undertake quality assessment.**

11. Appendices and Attachments

Appendix A	Reference Group membership
Appendix B	List of units of competency selected for audit
Appendix C	Australian Quality Training Framework Essential Conditions and Standards for Registration (2010) – selected for audit
Appendix D	Overview of the aged and community care industry
Appendix E	RTO survey responses
Appendix F	Audit methodology
Appendix G	Standards for NVR Registered Training Organisations Essential Standards for Registration – selected for audit
Appendix H	Employer survey responses
Attachment 1	AQTF 2007 National Guideline for Managing Non-Compliance (extract of categories of non-compliance)
Attachment 2	Employer survey questionnaire

Appendix A: Reference Group membership

The role of the Reference Group for the Strategic Industry Audit of Aged Care and Home and Community Care qualifications in Western Australia is to:

- provide input into the scope and audit approach;
- provide technical expertise on Aged Care and Home and Community Care qualifications;
- assist with the identification and mitigation of risks;
- provide input into the survey for RTOs, employers and students within the industry;
- provide advice on communication strategies, including questionnaires and surveys;
- assist with the promotion of the strategic industry audit to the wider sector, including employers and students;
- provide advice on trends and issues relating to best practice, opportunities for improvement and non-compliances highlighted through the audit process; and
- provide comment on and endorse the recommendations of the final report.

Membership

Ian Andrews	Executive Director Community Services, Health and Education Training Council
Sue Gordon	State Education Coordinator Aged Care Standards and Accreditation Agency (WA Branch)
Teresa Santoro	Training Manager Aged and Community Services WA (WA Branch)
Anne-Marie Archer (for planning phase)	CEO Aged Care Association Australian (WA)
Jane Sterck	Manager, Training and Workforce Development CommunityWest
Margaret Antonucci	Manager Training and Development Juniper
Karen Richardson	Senior Project Officer Department of Training and Workforce Development, ApprentiCentre
Julie Northridge	Regional Manager (WA) Australian Skills Quality Authority
Stephanie Trestrail	Executive Officer Training Accreditation Council Secretariat Department of Education Services
Janet Matheson	Manager, VET Compliance Training Accreditation Council Secretariat Department of Education Services
Olivia Mayo	Senior Project Officer (Project Manager) Training Accreditation Council Secretariat Department of Education Services

Appendix B: List of Units Selected for Audit Sample

Qualification	Unit of competency to sample (in order of selection)
CHC30208 Certificate III in Aged Care	<ul style="list-style-type: none"> a) CHCICS301A Provide support to meet personal care needs [CORE] b) CHCAC319A Providing support to people living with dementia [CORE] c) CHCPA301B Deliver care services using a palliative approach [CORE] d) CHCCS305B Assist clients with medication [group B elective]
CHC30212 Certificate III in Aged Care	<ul style="list-style-type: none"> a) CHCICS301B Provide support to meet personal care needs [CORE] b) CHCAC319A Providing support to people living with dementia [CORE] c) CHCPA301B Deliver care services using a palliative approach [CORE] d) CHCCS305C Assist clients with medication [group B elective]
CHC30308 Certificate III in Home and Community Care	<ul style="list-style-type: none"> a) CHCAC319A Providing support to people living with dementia [CORE] b) CHCICS301A Provide support to meet personal care needs [CORE] c) CHCPA301B Deliver care services using a palliative approach [GROUP B ELECTIVE] d) CHCAC412A Provide services to older people with complex needs e) CHCCS305B Assist clients with medication [ELECTIVE]
CHC30312 Certificate III in Home and Community Care	<ul style="list-style-type: none"> a) CHCAC319A Providing support to people living with dementia [CORE] b) CHCICS301B Provide support to meet personal care needs [CORE] c) CHCPA301B Deliver care services using a palliative approach [GROUP B ELECTIVE] d) CHCAC412B Provide services to older people with complex needs (pre req CHCAC318B) e) CHCCS305C Assist clients with medication [ELECTIVE]
CHC40108 Certificate IV in Aged Care	<ul style="list-style-type: none"> a) CHCAC412B Provide services to older people with complex needs (pre req CHCAC318B) [CORE] b) CHCICS401B Facilitate support for personal care needs [CORE] c) CHCAC416A Facilitate support responsive to the specific nature of dementia [CORE] d) CHCCS424B Administer and monitor medications [ELECTIVE]
CHC40208 Certificate IV in Home and Community Care	<ul style="list-style-type: none"> a) CHCAC416A Facilitate support responsive to the specific nature of dementia [CORE] b) CHCPA301B Deliver care services using a palliative approach [ELECTIVE] c) CHCAC412B Provide services to older people with complex [ELECTIVE] d) CHCCS424A Administer and monitor medications [ELECTIVE]
CHC40212 Certificate IV in Home and Community Care	<ul style="list-style-type: none"> a) CHCAC416A Facilitate support responsive to the specific nature of dementia [CORE] b) CHCPA301B Deliver care services using a palliative approach [ELECTIVE] c) CHCAC412B Provide services to older people with complex needs [ELECTIVE] d) CHCCS424A Administer and monitor medications [ELECTIVE]

Appendix C: Australian Quality Training Framework Essential Conditions and Standards for Continuing Registration (2010) – Selected for Audit

Condition 3	Compliance with legislation
Condition 6	Certification and Issuing of Qualifications and Statements of Attainment
Condition 8	Accuracy and integrity of Marketing
Condition 9	Transition to Training Packages/Expiry of Accredited Courses
Standard 1	The RTO provides quality training and assessment across all of its operations
1.1	The RTO collects analyses and acts on relevant data for continuous improvement of training and assessment.
1.2	Strategies for training and assessment meet the requirements of the relevant Training Package or accredited course and are developed in consultation with industry.
1.3	Staff, facilities, equipment and training and assessment materials used by the RTO are consistent with the requirements of the Training Package or accredited course and the RTO's own training and assessment strategies.
1.4	Training and assessment is delivered by trainers and assessors who: (a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and (b) have the relevant vocational competencies at least to the level being delivered or assessed, and (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and (d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.
1.5	Assessment including Recognition of Prior Learning (RPL): (a) meets the requirements of the relevant Training Package or accredited course (b) is conducted in accordance with the principles of assessment and the rules of evidence (c) meets workplace and, where relevant, regulatory requirements (d) is systematically validated.
Standard 2	The RTO adheres to principles of access and equity and maximises outcomes for its clients.
2.1	The RTO establishes the needs of clients, and delivers services to meet these needs.
2.2	The RTO continuously improves client services by collecting, analysing and acting on relevant data.
2.3	Before clients enrol or enter into an agreement, the RTO informs them about the training, assessment and support services to be provided, and about their rights and obligations.
2.4	Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.
2.5	Learners receive training, assessment and support services that meet their individual needs.
2.6	Learners have timely access to current and accurate records of their participation and progress.
2.7	The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.
Standard 3	Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the RTO operates.
3.1	The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.
3.2	The RTO uses a systematic and continuous improvement approach to the management of operations.
3.3	The RTO monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.
3.4	The RTO manages records to ensure their accuracy and integrity.

Appendix D: Overview of the Aged Care and Community Care Industry and its Regulation

The Aged Care and Community Care Sector

Aged Care is the personal care and/or nursing care provided to frail older Australians and their carers to facilitate independence, good health and wellbeing. Aged care is delivered through two (2) main programs: residential aged care and community care.

Aged Care is defined in more detail in the Productivity Commission's report, "Caring for Older Australians", as *a range of services required by older persons (generally 65 years and over (or 50 years and over for Indigenous Australians)) with a reduced degree of functional capacity (physical or cognitive) and who are consequently dependent for an extended period of time on help with basic activities of daily living. Aged Care is frequently provided in combination with basic medical services (such as help with wound dressing, pain management, medication, health monitoring), prevention, reablement or palliative care services.*

Residential Aged Care refers to facilities (other than hospitals) which provide accommodation and aged care as a package to people requiring ongoing health and nursing care due to chronic impairments and a reduced degree of independence in activities of daily living.

Community Care is the provision of care and support for people with functional restrictions who want to stay independent and living at home for as long as possible. This includes Home and Community Care services, Community Aged Care Packages and respite care services for carers.

The Productivity Commission report defines **Home and Community Care (HACC)** as *a program which provides a broad range of low-level care and support services to help people maintain their independence at home and in the community. HACC is a joint Australian, state and territory initiative.*

Community Aged Care Packages (CACP) are individually planned and coordinated packages of care tailored to help older Australians with low-level care needs to remain living in their own homes. They are funded by the Australian Government to provide for the complex care needs of older people.

Respite care is substitute care that can be arranged for planned breaks, regular weekly breaks, short holidays or for emergency situations such as family illness.

Caring for Older Australians – Productivity Commission Inquiry Report

The Productivity Commission conducted an inquiry into Aged Care and released its report on 8 August 2011. Key points raised in this report show that over one (1) million older Australians receive aged care services, with more than half receiving low-intensity support through the HACC program. It is anticipated that over 3.5 million Australians will use age care services by 2050.

The report identified that the aged care system was suffering from key weaknesses, including: being difficult to navigate; offering limited services and consumer choice; variable quality; and workforce shortages, exacerbated by low wages and insufficient skills in some workers. The report put forth proposals from the Commission to address the weaknesses and challenges and aim at delivering higher quality care.

As the number of older Australians rises and the demand for aged care workers increases, there will be a need for these workers to be well trained. One (1) of the recommendations (14.4, copied below) was pertinent to the functions of the Training Accreditation Council and contributed to the need for the SIA.

Recommendation 14.4

Given industry concerns about the variability in training outcomes for students, the Australian Government should undertake an independent and comprehensive review of aged care-related vocational education and training (VET) courses and their delivery by registered training organisations (RTOs). Among other things, the review should consider:

- examining current practices that may be leading to variability in student outcomes, including periods of training and practicum*
- reviewing procedures to ensure that VET trainers and assessors possess required current practice knowledge*
- identifying whether regulators are adequately resourced to monitor and audit RTOs using a risk-based regulatory approach and have appropriate enforcement regimes that allow for appropriate and proportional responses to non-compliance by RTOs*
- identifying reforms to ensure students demonstrate pertinent competencies on a more consistent basis.*

This recommendation led to proposed reforms (copied below) for workforce issues to improve employment conditions and training for the formal care workforce.

<i>Current problem</i>	<i>Proposed reform</i>	<i>Main benefit of change</i>
<i>A lack of vocational training packages for the aged care sector and poor quality of training provided by some registered training organisations.</i>	<i>Promote skill development through an expansion of accredited courses to provide aged care workers at all levels with the skills they need.</i>	<i>Develop and promote career paths for aged care workers and improve the quality of care that those workers are able to deliver.</i>
<i>The quality of aged care training delivered by registered training organisations is variable.</i>	<i>Independently review delivery and outcomes of aged care related vocational education and training courses by registered training organisations.</i>	<i>Ensure that appropriate minimum standards are applied in the delivery of accredited aged care courses and that students demonstrate the appropriate competencies.</i>

The Council's SIA was developed with these recommendations in mind.

Regulation of the Aged Care Sector in Western Australia

In Australia, residential aged care homes are required to be accredited if they are to receive Australian Government subsidies. The independent accreditation body, the Aged Care Standards and Accreditation Agency¹¹, promotes high-quality care in the Australian Government-subsidised residential aged care sector, through the management of the accreditation program and a comprehensive industry education program.

¹¹ Aged Care Standards and Accreditation Agency Ltd, <http://www.accreditation.org.au/about-us/>

The Agency assesses homes' performances against a set of legislated Accreditation Standards, the *Aged Care Act 1997*, which cover:

- 1) management systems, staffing and organisational development;
- 2) health and personal care;
- 3) residential lifestyle; and
- 4) physical environment and safe systems.

The accreditation process includes:

- self-assessment by the home against the Accreditation Standards;
- submission of an application for re-accreditation (with or without the self-assessment);
- assessment by a team of registered aged care quality assessors at a site audit;
- a decision about the home's accreditation by a decision-maker (not part of the assessment team);
- issue of an accreditation Certificate;
- publication of the decision on this website; and
- unannounced visits to monitor homes' on-going performance.

Community Care Common Standards

The Community Care Common Standards¹² have been developed jointly by the Australian Government and State and Territory Governments as part of broader community care reforms to develop common arrangements that help to simplify and streamline the way community care is delivered. The Common Standards draw together the differing community care standards into a single set of quality standards and have the benefit of reducing the administrative burden for service providers.

By agreement between the then Commonwealth Minister for Ageing and the Ministers with responsibility for community aged care in every State and Territory government, the Community Care Common Standards apply to the following community aged care programs:

- Home and Community Care (HACC);
- Community Aged Care Packages (CACP);
- Extended Aged Care at Home (EACH);
- Extended Aged Care at Home Dementia (EACHD); and
- National Respite for Carers Program (NRCP).

There are three (3) Standards: Effective Management, Appropriate Access and Service Delivery and Service User Rights and Responsibilities. There are 18 expected outcomes: eight (8) management outcomes, five (5) service delivery outcomes and five (5) service user rights outcomes.

Quality reviews will be conducted by quality reviewers from the Department of Health and Ageing (DoHA) and the relevant State and Territory government departments or their representatives.

¹² Department of Health and Ageing, Australian Government website, www.health.gov.au, 22 March 2013

Home and Community Care Assessment Framework

The WA Assessment Framework (WAAF)¹³ was implemented in the Perth Metropolitan area at the beginning of 2011 and into the South West and Kimberley regions in July 2012. This has resulted in a significant shift in the way HACC support is delivered.

The overall goal of the WAAF is to ensure that *all community care clients and their carers receive a personalised, quality service that is underpinned by an assessment that identifies their needs, builds on their strengths and reflects their aspirations.*

The WAAF objectives are to:

- provide an identifiable point of entry into the community care system that supports the client/carer with clear, accurate and relevant information and referral to appropriate assessment and/or services to address identified needs;
- conduct or refer to appropriate assessments and provide targeted and responsive service delivery to support the client/carer to maintain and improve their well-being and independence;
- ensure that the client/carer journey in the community care system is supported by effective communication and cooperation between all parts of the system and that the client/carer is at the centre of the decision-making; and
- improve the collection and exchange of client/carer information to prevent duplication.

This will be achieved by:

- effectively managing client pathways
- providing appropriately targeted service responses; and
- refocusing service delivery towards an approach that support the implementation of the philosophy of wellness, which is to maintain and improve client independence wherever possible.

The effectiveness of the WA Assessment Framework is assessed against the stated objectives. The implementation of the WAAF is being independently evaluated to ensure that the WAAF objectives are being achieved and to identify opportunities for continuous improvement.

Moving Forward in the Aged Care and Community Care System

The ageing of Australian's population has been identified as an achievement whereby Australians can now expect to have an extended period of healthy, active retirement. However, this is also predicted to put a strain on the aged care system, where too few people are able to access care and support in their own homes where they want it, there are not enough nursing homes being built, and employers are having trouble recruiting and keeping the aged care workers they need.

The Australian Government, through DoHA, is inputting a significant amount of funding to build a better, fairer and more nationally consistent aged care system, through the Living Longer Living Better, Aged Care Reform Package¹⁴, released in April 2012. There are a number of initiatives, including funding to: help people to stay at home through the Home Care packages; deliver better residential aged care; strengthen the aged care workforce; tackle the nation's dementia epidemic; and build a system for the future.

¹³ WA Assessment Framework information, <http://www.communitywest.com.au/Assessment-Framework/introduction-to-assessment-framework.html>

¹⁴ Commonwealth of Australia, April 2012, Living Longer Living Better <http://www.health.gov.au/internet/publications/publishing.nsf/Content/ageing-aged-care-reform-measures-toc>

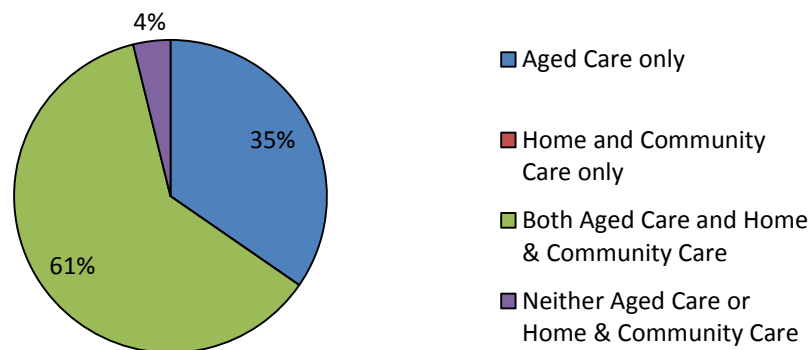
An appropriately skilled and well qualified workforce is fundamental to the delivery of quality aged care across both the residential and home care sectors. The DoHA, in its Living Longer Living Better report, identifies that aged care services continue to have difficulties in attracting and retaining sufficient numbers of skills and trained workers, with a 25% turnover rate of workers in the aged care sector. This leads to reduced productivity and higher training costs, as well as negative impacts on the quality of care.

Appendix E: RTO survey responses – RTOs in Audit Sample

The data gathered from the survey of RTOs selected for audit is represented below. This is aggregated data only, where individual RTOs are not identified. The data is for 26 RTOs, 20 registered with TAC and six (6) with ASQA.

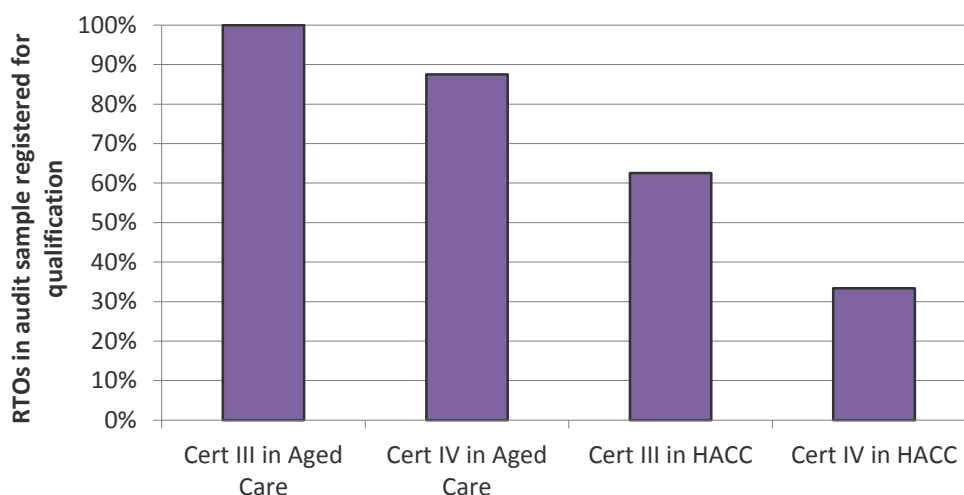
- ❖ Of the 26 RTOs surveyed, 61% (16) are registered for both Aged Care and HACC qualifications, as **figure 13** demonstrates. One (1) RTO had removed the qualification(s) from its scope after it was selected for the audit sample. No RTOs were registered for HACC qualifications only.

Figure 13: The qualifications for which the 26 surveyed RTOs are registered



- ❖ All of the RTOs selected for audit were registered for the Certificate III in Aged Care (CHC30208 and/or CHC30212), while only one (1)-third were registered for Certificate IV in Home and Community Care (CHC40208 and/or CHC40212). **Figure 14** shows the percentage of RTOs registered for each qualification.

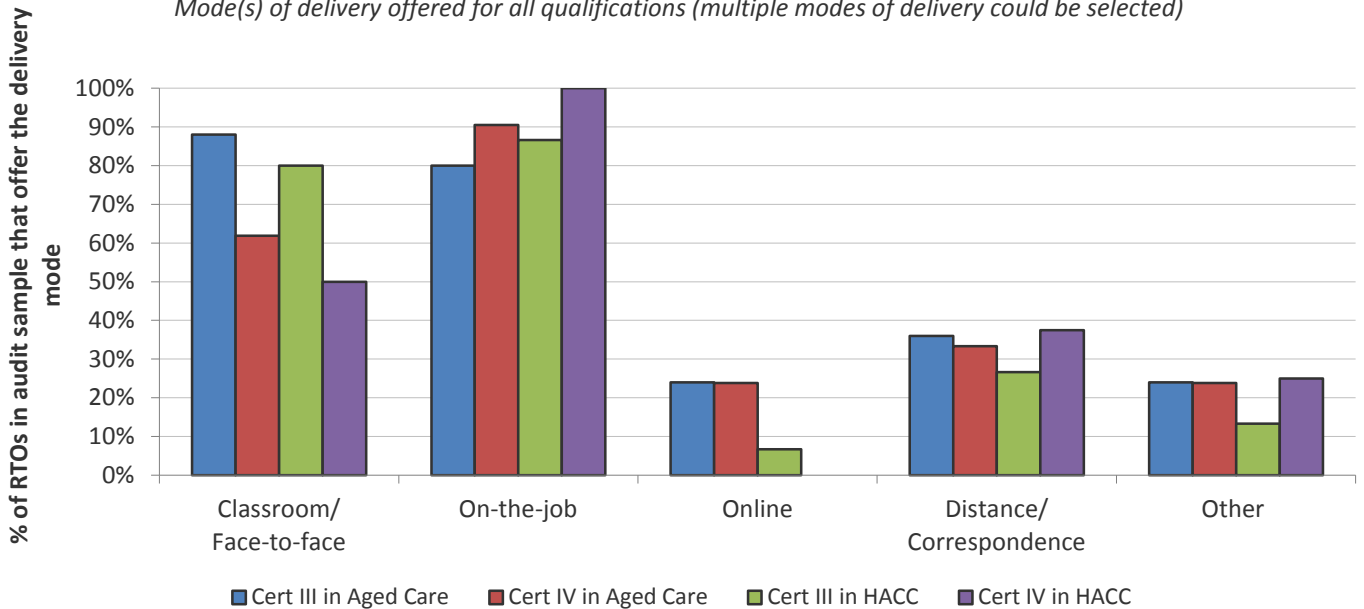
Figure 14: Percentage of RTOs in audit sample registered to deliver each qualification



- ❖ The most common response for delivery method was classroom/face to face, with 22 or the 25 RTOs offering this mode, as shown in **figure 15**. Some of the responses for “other” included flexible scheduled and unscheduled, RPL, traineeships where there is some workplace assessment, and/or workshops and self-directed learning.

Figure 15: Modes of delivery offered by RTOs

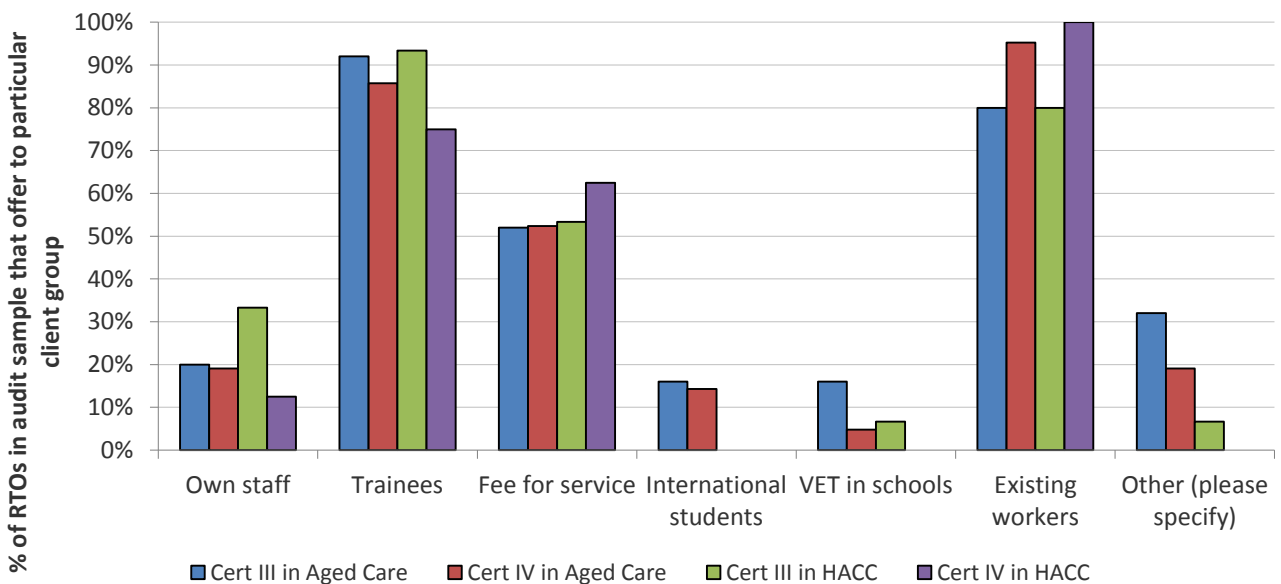
Mode(s) of delivery offered for all qualifications (multiple modes of delivery could be selected)



- ❖ **Figure 16**, shows the client groups that the RTOs in the audit sample indicated they offered training services to.

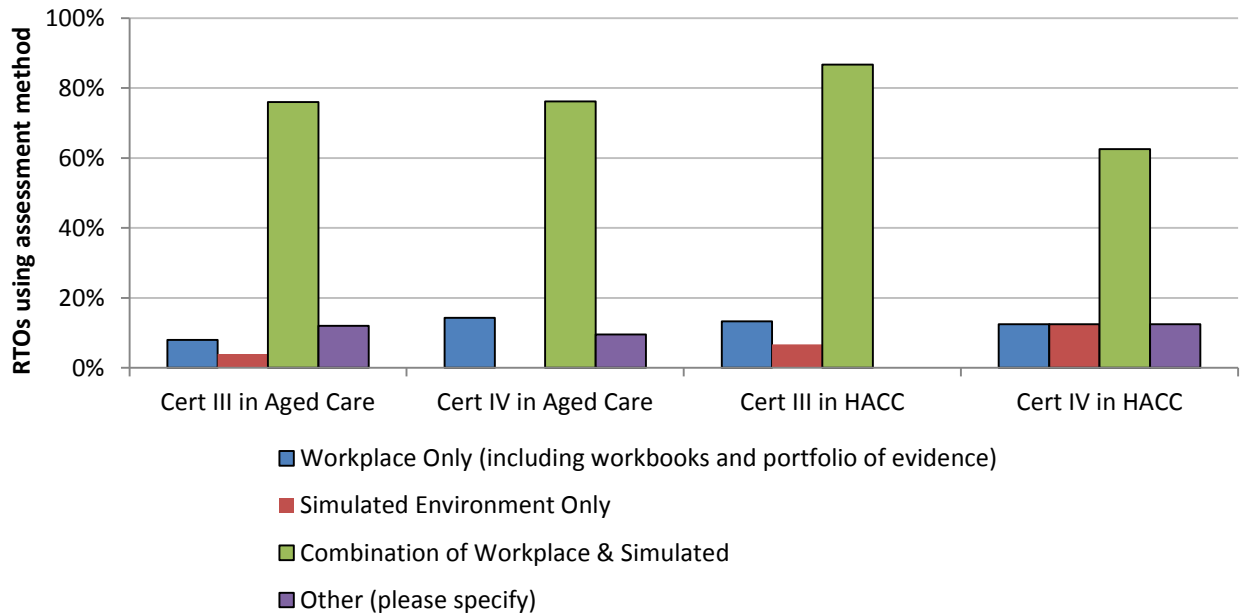
Figure 16: Client groups the RTO offers to

Clients that group training is offered to, for all qualifications (multiple groups could be selected)



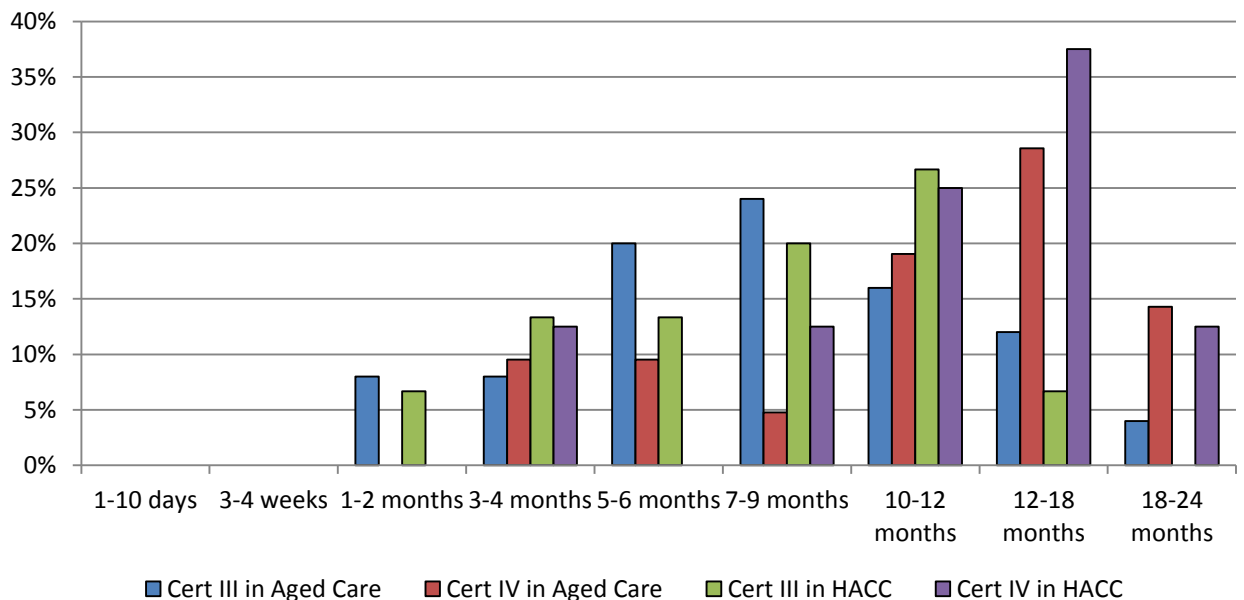
- ❖ **Figure 17**, shows that overwhelmingly the most common assessment methods combined work placement and simulation. This was across all four (4) qualifications.

Figure 17: Assessment methods used by RTOs



- ❖ The RTOs surveyed were asked to indicate the average duration of each qualification they offered. The results are depicted in **figure 18**.

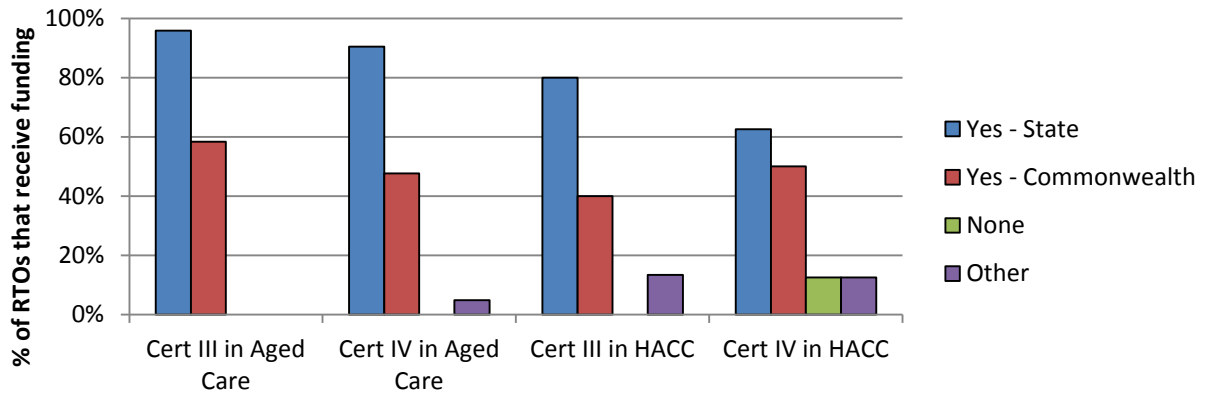
Figure 18: Average duration of the qualifications



- ❖ Only one (1) RTO indicated that it had a partnership arrangement in place for the Certificate III in Aged Care.

- ❖ **Figure 19** shows if the RTO receives public funding and the source. Those which indicated “other” gave reasons that the RTOs had not started training in that qualification yet, though it would be eligible for funding on commencement.

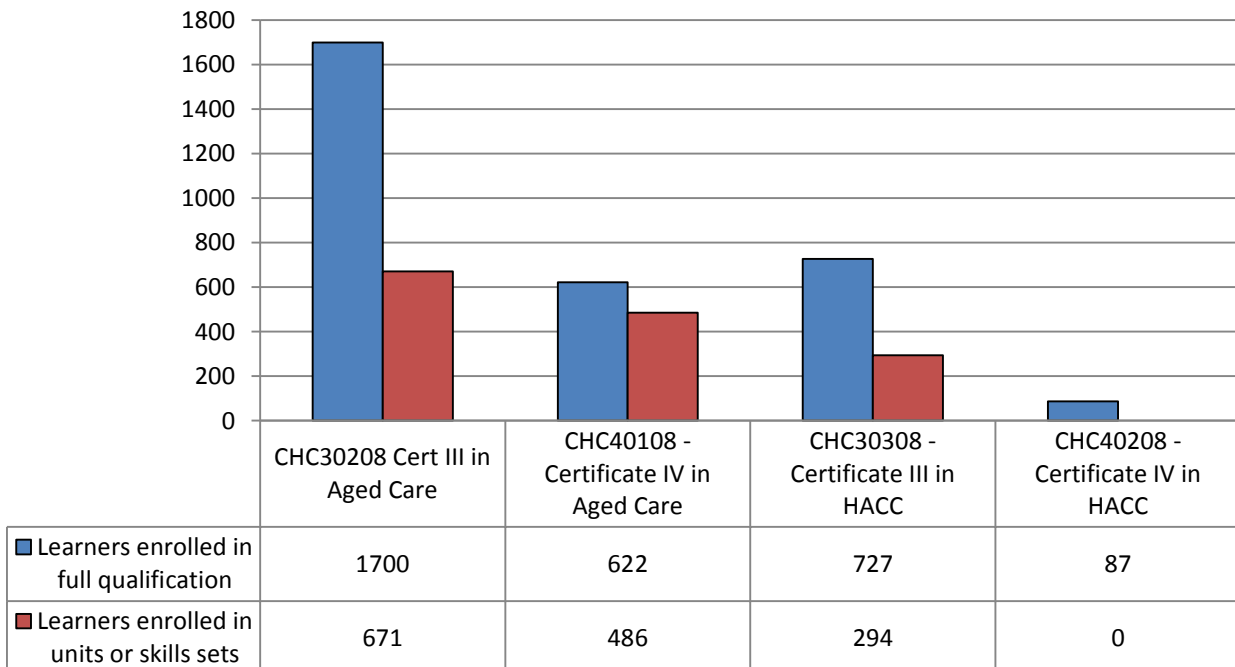
Figure 19: Sources of funding for qualifications



- ❖ The RTOs surveyed provided data regarding the number of learners enrolled in the qualification(s) and units or skill sets only in the January to September 2012 (**figure 20**) and the number of qualifications testamurs and statements of attainment issued in the same period (**Figure 21**).

Figure 20: Learners enrolled from January - September 2012

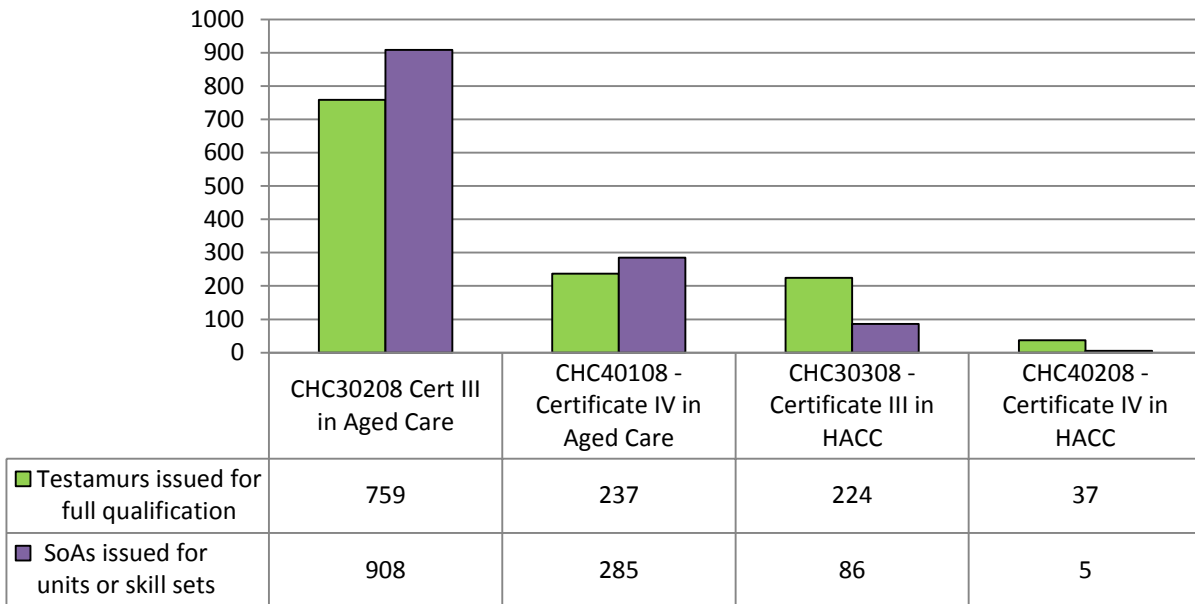
Number of learner enrolments in full qualification for the period of January to September 2012



The data provided for enrolments in units of competency or skills sets is only indicative as the RTO may enrol students in several small components, rather than for the qualification as a whole enrolment.

Figure 21: Certificateification issued from January–September 2012

Testamurs issued for full qualification(s), and statements of attainment issued for units of competency or skill sets, for January–September 2012



This data can be further divided to show the registering body these RTOs are registered with.

Figure 22: Learners enrolled in full qualification between January and September 2012

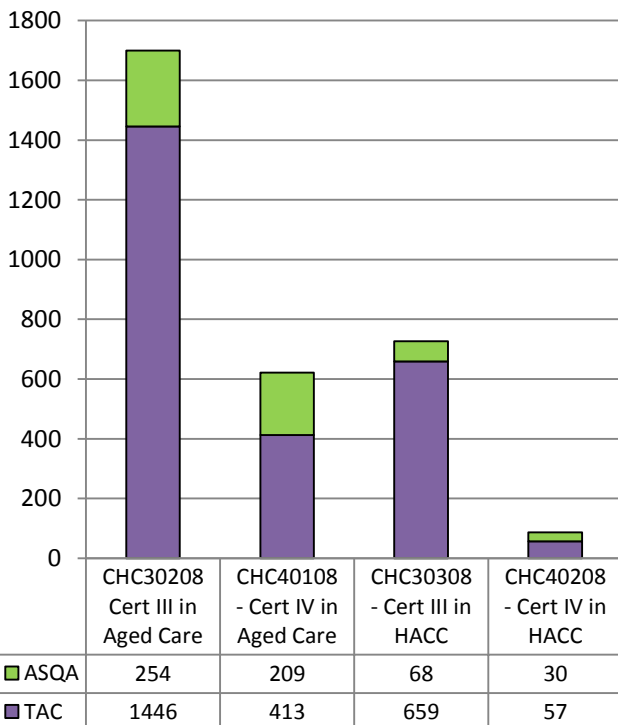
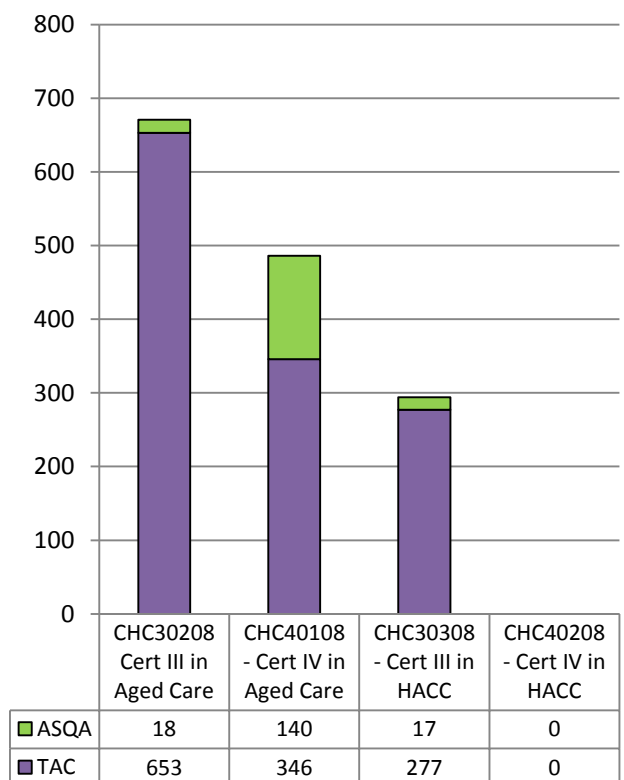


Figure 23: Learners enrolled in units or skills sets between January and September 2012



Appendix F: Audit Methodology

Pre-Audit Survey

A survey was conducted prior to formal endorsement of the SIA to determine how many RTOs that were registered for one (1) or more of the qualifications were actually delivering or intending to deliver the qualification(s) in WA. This survey was conducted electronically via an online survey tool.

Audit Process

The SIA consisted of the following steps:

1. establish and convene Reference Group;
2. develop audit process and methodology and have been endorsed by Reference Group;
3. advise all RTOs with relevant scope of SIA and RTO surveys to be completed;
4. finalise audit sample and methodology;
5. establish technical advisory panel and conduct technical advisor briefing;
6. assign audits and conduct auditors' briefing;
7. conduct audits of RTOs;
8. conduct survey of employers;
9. compile industry and strategic data/information;
10. audit report to be drafted and distributed to reference group for comment;
11. final audit report presented to Council for endorsement; and
12. endorsed report distributed to key stakeholders, and published report.

The conduct of the SIA was in line with TAC's established audit process and the requirements of the AQTF Audit handbook.

Parameters for the Audit

The Reference Group met on two (2) occasions, in May and September 2012, to discuss and confirm the roles and responsibilities of the Reference Group and the TAC Secretariat, and to determine the objectives, scope, process and criteria for the audits.

The requirements established and agreed for the conduct of the audit were as follows:

- a risk assessment would be undertaken to determine the audit sample, which would include a number of RTOs that are actively delivering and/or are intending to deliver one (1) or more of the qualifications in WA;
- all audits would be site audits ;
- RTOs to be advised of the audit focus in line with TAC's established audit process;
- compliance with the AQTF Essential Conditions and Standards for Continuing Registration to be recorded on the day of the audit;
- industry advisors are to accompany the auditor on all site visits, where possible;
- student records and assessments to be tracked during audit;
- feedback from students to be obtained as part of the audit process, interviewing students where possible;

- employer interviews to be conducted as part of the audit process, and given their significant role in training and assessment, the level of employer engagement should be captured;
- TAC's established system for recording and responding to compliance outcomes to be applied;
- auditors to provide additional comment of a range of issues relating to training and assessment and as identified by the Reference Group;
- a wider survey of employers to be conducted online, with Reference Group members assisting with the promotion of the survey to their stakeholders; and
- preparation of a report on the outcomes of the SIA.

Determination of the Audit Sample

Data collected from the initial survey provided relevant and current information on the activity of RTOs in relation to the delivery of the identified qualifications in WA and contributed to the risk assessment and determination of the final audit sample. The risk assessment was conducted in line with the AQTF National Guideline for Risk Management and included factors such as recent registering body audits, current trainee numbers, funding, current applications pending, relevant RTO history and the survey results.

RTO Survey – RTOs Selected for Audit

A second, targeted survey was conducted of the 26 RTOs that had been selected for the audit sample. The survey collected data relating to delivery in WA, enrolments, qualifications issued, delivery modes, pathways and client groups. The survey also provided RTOs with an opportunity to raise issues or concerns about the qualifications that may require consideration during the audit.

This survey was conducted prior to the audits taking place, and the response from each RTO was provided to the auditor to assist with the audit process.

Audit Team Briefing

Due to the industry requirements and complex nature of the qualifications it was agreed that industry advisors would participate in site audits of the RTOs, where possible. Industry advisors play a valuable role in the provision of specific advice on industry requirements and current practice. A briefing session was conducted in August 2012 for both the industry advisors and the auditors. The purpose of the briefing was to:

- provide the background and overview of the SIA;
- discuss the role of industry advisors at audit, including audit protocols, conflict of interest issues and confidentiality requirements;
- provide an overview of the Aged Care accreditation standards (session run by the State Education Coordinator, Aged Care Standards and Accreditation Agency);
- provide an overview of issues raised by the Reference Group; and
- discuss the audit process, focus and specific requirements of the audit, including the role of technical advisors.

The joint briefing provided an opportunity for the industry advisors and auditors to meet prior to arriving at the audits. Both groups were able to ask specific questions of the other party.

RTO Audit Reporting Tool

Auditors used the standard TAC template for reporting audit outcomes, through the online AuditorNet facility.

The supplementary data and additional information requested by the Reference Group was provided in a supplementary reporting template and provided directly to the TAC Secretariat. The reports were analysed by the TAC Secretariat and included in the report.

Conduct of Audits

Audits were conducted by TAC's external panel of auditors and undertaken as site visits. The compliances and non-compliances identified in this report are based on the outcomes on the day of the audit. It is important to note that for an RTO to maintain registration under the AQTF, it must be fully compliant with the AQTF.

TAC processes allow for RTOs that are found non-compliant against the AQTF Essential Conditions and Standard for Continuing Registration at audit to provide additional evidence within a specified timeframe – 20 working days after receipt of the audit report – in order to demonstrate compliance.

In some instances, provision of additional evidence is sufficient to demonstrate compliance with the Standards; however where non-compliances remain, the matter is referred to TAC for further consideration and action.

Employer Survey

The Reference Group agreed to a survey of employers to seek feedback on employer satisfaction with the training provided to students in Aged Care and Community care qualifications and the ability of staff who have recently graduated with a relevant qualification. The survey was open to all stakeholders who wished to provide comment.

The survey was administered by the TAC Secretariat, through the use of an online survey tool. The invitation to participate in the survey was directly sent to employers of current Aged Care and HACC trainees, though the survey was not limited to employers with trainees. The Reference Group also assisted in the promotion of the survey to its wider stakeholder group.

A copy of the Employer survey is provided at **Attachment 2**.

Over 180 responses to the survey were received. The responses to all non-mandatory questions have been analysed and the outcome is included in the body of this report.

Appendix G: Standards for NVR Registered Training Organisations Essential Standards for Continuing Registration – Selected for Audit

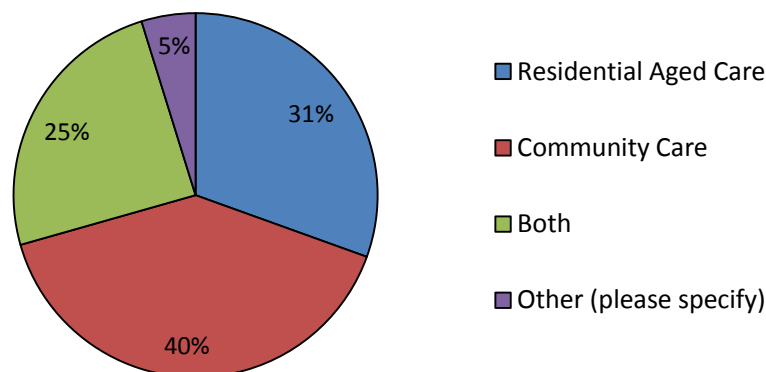
SNR 20	Compliance with legislation
SNR 23	Certification, issuing and recognition of Qualifications and Statements of Attainment
SNR 24	Accuracy and integrity of marketing
SNR 25	Transition to Training Packages/Expiry of VET accredited Courses
SNR 15	The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:
15.1	The NVR registered training organisation collects analyses and acts on relevant data for continuous improvement of training and assessment.
15.2	Strategies for training and assessment meet the requirements of the relevant Training Package or VET accredited course and have been developed through effective consultation with industry.
15.3	Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the Training Package or VET accredited course and the NVR registered training organisation's own training and assessment strategies and are developed through effective consultation with industry
15.4	Training and assessment is delivered by trainers and assessors who: (a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and (b) have the relevant vocational competencies at least to the level being delivered or assessed, and (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and (d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.
1.5	Assessment including Recognition of Prior Learning (RPL): (a) meets the requirements of the relevant Training Package or VET accredited course (b) is conducted in accordance with the principles of assessment and the rules of evidence (c) meets workplace and, where relevant, regulatory requirements (d) is systematically validated.
SNR 16	The NVR registered training organisation adheres to principles of access and equity and maximises outcomes for its clients.
16.1	The NVR registered training organisation establishes the needs of clients, and delivers services to meet these needs.
16.2	The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.
16.3	Before clients enrol or enter into an agreement, the NVR registered training organisation informs them about the training, assessment and support services to be provided, and about their rights and obligations.
16.4	Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.
16.5	Learners receive training, assessment and support services that meet their individual needs.
16.6	Learners have timely access to current and accurate records of their participation and progress.
16.7	The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.
SNR 17	Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates.
17.1	The NVR registered training organisation's management of its operations ensures clients receive the services detailed in their agreement with the NVR registered training organisation.
17.2	The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations.
17.3	The NVR registered training organisation monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the AQTF Essential Conditions and Standards for Continuing Registration.
17.4	The NVR registered training organisation manages records to ensure their accuracy and integrity.

Appendix H: Employer Survey Responses

The data gathered from the employer survey is represented below. There were no mandatory questions in the survey, and the respondents were able to skip questions.

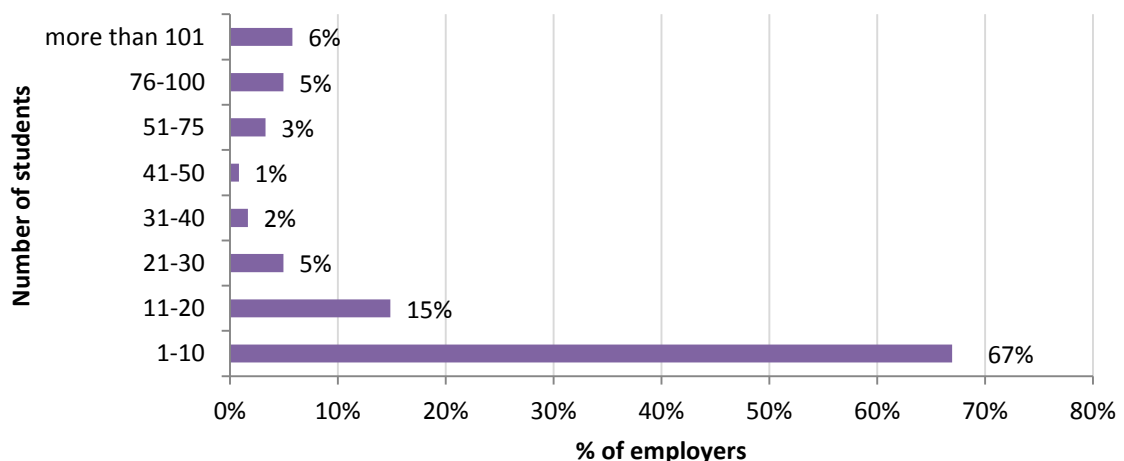
- 40% (75) of the 187 employers that responded indicated that they work in the Community Care (e.g. home and community care) industry, as represented in **Figure 24**. The employers who listed “other” included training, hospitals, centre based day care and respite care in cottage respite setting.

Figure 24: Area(s) the responding organisations work in



- 28 (15%) of the respondents were also registered training organisations; 39 (~21%) were affiliated with a training organisation and 52% (97) were neither RTOs or affiliated with one.
- At the time of the survey, 152 of the 187 employers had students who were undertaking studies in Aged Care or Community Care. This included own staff and external work placement students).
- Figure 25** below indicates the responses of proportion of the 121 employers who answered the question about how many students (including trainees, own staff and work placement students) are based in the facility. The majority of respondents have less than 10 students.

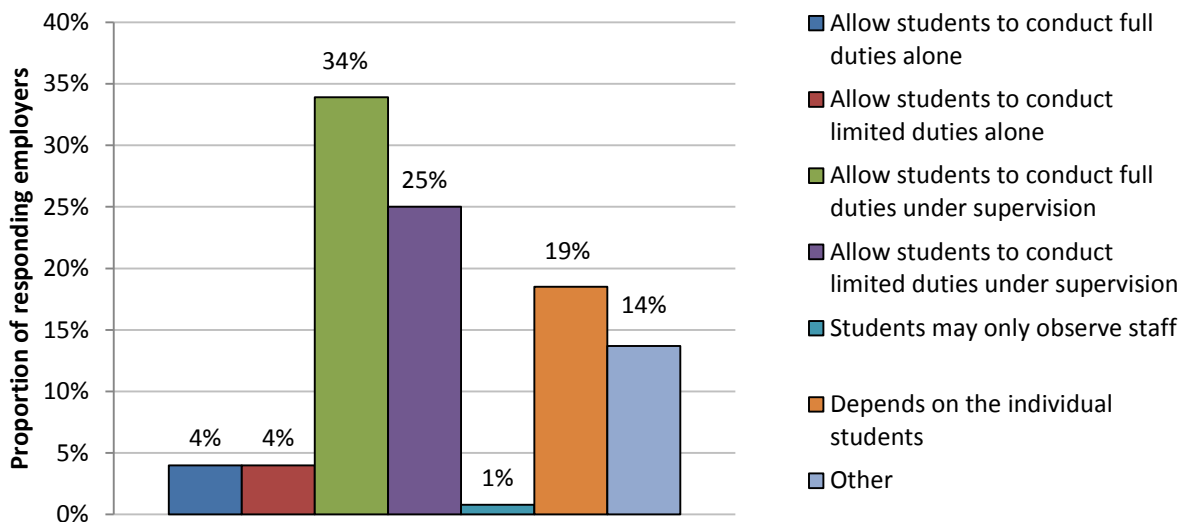
Figure 25: Number of students currently at employer
Number of students based in facility for each responding employer



- The employers indicated that the majority of the students were enrolled in the Certificate III in Aged Care, followed by the Certificate IV in Aged Care. Other qualifications listed included Nursing qualifications (RN and EN), Business Management, Occupational Therapy students, Certificate IV in Leisure and Health, Certificate IV in Mental Health.
- 57% indicated that the organisation/facility had a formal written agreement or memorandum of understanding with the training provider; 21% had informal arrangements; and 9% did not have any arrangements in place with the training provider. 7% were unsure of the arrangements.
- As we have seen, **Figure 9**, reproduced below, shows that 34% of the employers who answered this question allow work placement students to conduct full duties under supervision, while 25% allow students to conduct limited duties while under supervision. 1 employer only allows students to observe staff.

Figure 9 (reproduced): Duties for work placement students

Range of duties that employers allow work placement students to undertake



In response to identifying some of the tasks the students can do on work placement, the list of tasks was varied and included just about everything that could be done (1): cleaning, feeding, serving meals, assistance with meal preparation, talking to clients, making tea and coffee, showering, manual handling, personal care.

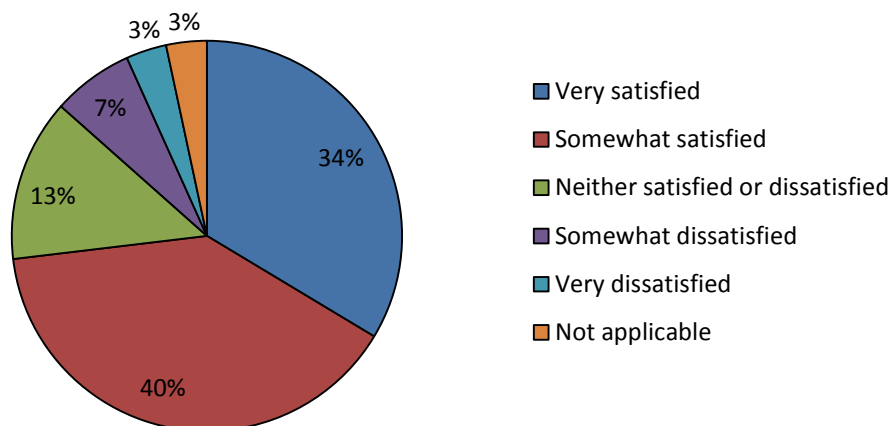
- 54% of 130 employers indicated that both the RTO and the facility/organisation assess students who are on work placement in their facility; 28% indicated that it is the RTO; 15% stated it was the facility or organisation's responsibility; and 4% were unsure. This was dependent on the role of the person who completed the survey.

One (1) respondent commented that they do not take on external students, as the work placement RTOs wanted the facility to do all training and assessment.

- 30% of respondents who answered this question (123) indicated they signed off assessments as the assessor. As more than one (1) option could be selected, 68% indicated that they sign off on log books or other training records; 51% sign off as verification of work by the students; 56% stated they observe the students; and 10% had no input with the assessments of the students.

- Employers were asked about their satisfaction with the level of support from the RTO. **Figure 10** (reproduced) shows that 74% of the 119 employers who responded to this question were either somewhat or very satisfied with the level of support they receive from the RTO.

Figure 10 (reproduced): Level of satisfaction with support from RTO



- 14% of 119 respondents indicated they have weekly contact with a representative of the RTO; 19% selected monthly and 1 RTO indicated yearly. 5% indicated they had no contact with the RTO, while 29% selected that the level of contact varies.

Some of the comments from the 14% that selected 'other' included 'as much as we want', 'the RTO only contacts us when they want to place a student usually not against until they want another student placed', 'we receive calls from various RTOs depending on when they have students so it is not really a specific relationship with one (1) RTO', '1 visit throughout the duration of the work placement period' and 'contact depends on whether students are in the workplace'.

- The employers were asked about the support arrangements in place within their facility/organisation for the students. 77% indicated that supervisors and senior staff are available for students to contact; 74% have a buddy; 39% provide mentors; and 56% indicated that someone (1) from the RTO is available for students to contact.
- The overall ability, from an employer's perspective, of staff new to the Aged care and/or community Care sector who have recently graduated with a qualification in Aged Care or HACC, to understand the requirements of their role and work effectively in industry, was rated in the image below in **figure 11**.

Verbatim comments accompanying this question included:

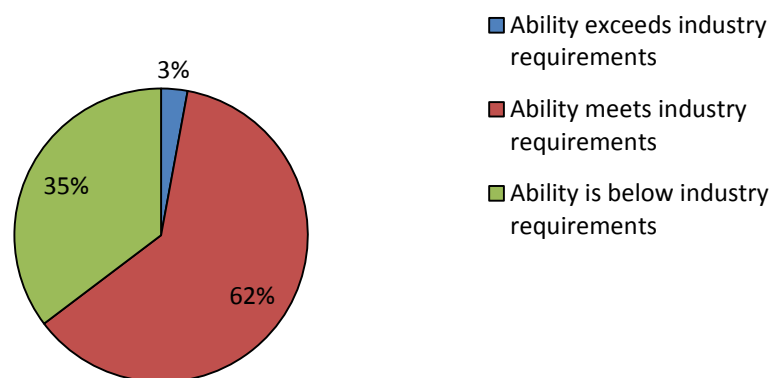
- dependent on individual students. Some coming through with little English skills. Some have a wonderful attitude whilst some are only there because it's a means to work;
- worst are the fast track students who, in my opinion, are dangerous. They think they know everything but they come with a practical level that is the same as the person straight off the street and try to marry the theory that has been given to them in a very short space of time. Doesn't work;
- many of the RTO courses are completed in 3 weeks in the class room and limited practical time. This is insufficient to prepare them for the real world of aged care. Combine this with many students who do

not have sufficient English language skills or who are unfamiliar with our culture and you have a disaster;

- certificates can be granted in 5 days on some occasions and this is not sufficient time to grasp the full picture of aged care. You can NOT teach attitude. Passion and the right attitude need to go hand in hand with Certificate;
- all new staff require experience, otherwise they become purely task orientated and not able to think outside the square; and
- it will depend on who provided the Certificate Training and prior experience in the workplace and industry as to the preparedness of individuals.

Figure 11 (reproduced): Ability to work in the industry once qualified

Employer response to staff new to the industry who have recently graduated with a Certificate in Aged Care or Home & Community Care

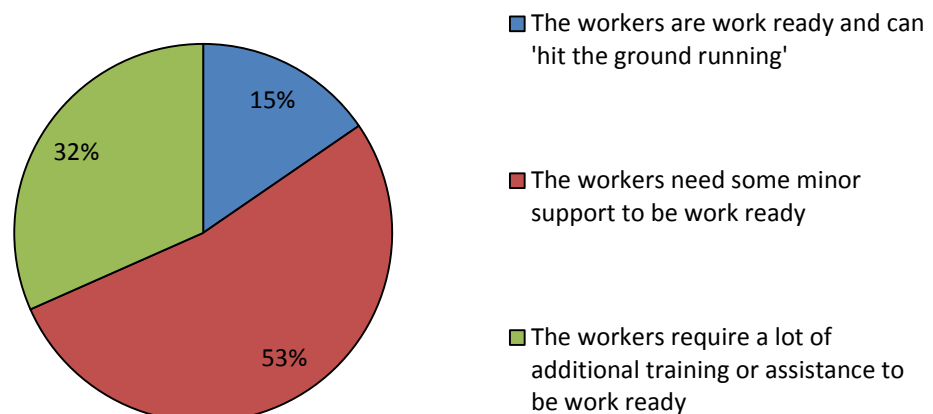


- Staff gaining their qualification over a period of time demonstrate a good understanding of the requirements of the job role than those who complete the qualification in a shorter period of time
- It does depend on the individual student at times (ie CALD staff - still below competency for LLN requirements - this is a SERIOUS issue for us). Some units more than others. Clinical / dementia / palliative care units are not delivered well at all. Some ADL's not delivered well; anything about legislation not delivered well. Overall very dissatisfied with competency levels - puts unnecessary burden on us to continually train a 'qualified' person.
- However this has not always been the case. Currently we receive a high level of communication flow through from RTO on student progress and attendance at training sessions and we are involved as an organisation in identifying the specific areas of training essential to our care delivery. This has been the first organisation that we have been satisfied with in the last five (5) years
- If we have conducted the training with our RTO, I believe ability exceeds industry requirements. If coming to our organisation newly qualified I believe their qualifications are sometimes below industry requirements.
- Depends on the employee. There have been occasions when I have wondered how the employee passed the course.
- Depending on the training organisation, some students have poor understanding and expectations of Aged Care.
- Paper-based experience, not enough hands-on and understanding of the requirements of Carer "all warm and fuzzy" not reality.
- As a facility, we have recently conducted a competency survey relating to understanding of roles and responsibilities of staff in an aged care setting. We are disappointed to discover a lack of knowledge and understanding of several key issues including the importance of individual client service delivery/support plans, planning strategies and goal-setting, monitoring and ongoing assessment on an individual basis, overall lack of awareness of issues relating to client engagement and motivation,

documentation of important information relating to support needs of clients, lack of awareness of the need to adopt a professional approach to their support role, reluctance to accept responsibilities for integral parts of their support role, preferring to transfer responsibility managers/supervisors i.e. putting relevant issues in the "too hard basket", staff focus being placed on their own needs ahead of needs of clients.

- 49% of employers indicated that they believed students are receiving the full range of training and work experience they need during their course to prepare them to work in the industry, while the remaining employers selected "no" to this question.
 - Longer work experience periods would be beneficial, giving students a clearer and better understanding of what the industry requires of them.
 - It will often depend on the RTO, the placement experience they have had and the quality of the placement personnel signing off assessments and progress.
 - Many of the students may have achieved competency in personal care but are unable or unsure on how to change a bed with a resident in, complete a bed bath or trolley bath etc
 - The training appears to lag behind the job requirements particularly in terms of cultural awareness and cultural safety, technology, the often isolated nature of the job, and the promotion of the attitudes and values required to work effectively in the sector.
 - In our RTO, I would say yes, but in many external RTOs I would say definitely no.
 - Need documentation training eg.- re: ACFI and that it is a requirement of the job
 - The training appears to lag behind the job requirements particularly in terms of cultural awareness and cultural safety, technology, the often isolated nature of the job, and the promotion of the attitudes and values required to work effectively in the sector.
- **Figure 12** depicts the experience employers have with recent graduates of Certificate III in Aged Care or HACC qualification. 53% of respondents selected a statement that “the workers need some minor support to be work ready”.

Figure 12(reproduced): Employer's experience with recently qualified workers
Employers' experiences with recently qualified workers in Aged Care and Community Care qualifications



- 58% of respondents indicated that their organisation needed to do extra training (excluding company induction) after employing new graduates who have not worked in the industry

before. 32% found that this depends on the staff member. Only 4% do not need to offer extra training, and 6% found that it depends on the training provider.

Some of the comments supporting this question include:

- *I only take graduates from training providers that provide adequate practical training;*
 - *we always provide additional training and on-going training to ensure a full and rounded learning experience in the workplace;*
 - *boundaries, First Aid Medication, Manutention and additional short workshops to highlight different areas of aged care eg independent living aids, incontinence etc;*
 - *all our trainees are current staff and must undertake inductions and essential skills training*
 - *most of the time, and definitely with CALD staff or staff with no previous work experience in aged care. Work placements are not long enough to give the skills they require to be ready to hit ground running; and*
 - *each organisation has a different blend of activities. This brings a different emphasis. Often it is the unlearning of those who have previous experience that is the essential. Currently we have a new worker who has 9 years' experience in another organisation and this can be just as challenging when our process of change and adaption is slower and in a different way. Many have an administrative understanding but it is the practical application that they lack.*
- The employers were asked to indicate if they found that the language, literacy and numeracy skills of new graduates in the workplace are adequate to carry out work to the required employment levels. 41% indicated "yes", 16% indicated "no", while 43% indicated that it varies and were asked to provide comment.
 - *Some RTOs monitor communication and writing skills and others do not. There should be a standard across all RTOs. I particularly find students studying through RTOs that are not based in WA that do not get tested for their English skills. This builds a bad reputation for the RTO who has sent the student to us and it also wastes our time when they are sent and we find we cannot accept them as a student.*
 - *Some students have had higher education compared to others. It is only natural then that the latter will sometimes struggle with grammar or struggle to understand instructions, therefore, they need more assistance from staff or supervisors.*
 - *Students with second language as English are not always suitable to aged care as they do not communicate with the elderly*
 - *We are getting more and more CALD staff members who need a lot more support, often cannot be understood by clients and cannot follow directions.*
 - *Ability to communicate in English is an essential criteria for employment.*
 - *Depending if English is second language.*
 - *We have previously employed staff who have a Certificate 3 or 4 and have found they are reluctant to complete charts/progress notes etc. due to inability to write coherently in.*
 - *If working with aged, particularly with hearing problems, need to be able to speak clearly and slowly and some CALD students unable to do this.*
 - *Language barriers and understanding of our client demographic can create issues. We often find we are mediating between staff and client to help explain to staff why certain behaviour is not acceptable in our society.*
 - *About 50% of students have language skills below requirements for aged care.*

- 60% of respondents indicated that the employer required staff to have the Certificate III for employment.

Some of the supporting comments provided include:

- *it is preferable, but would look at their overall level of experience and make a decision to employ based on experience;*
 - *this is preferred but we do hire staff who are not qualified. I organise traineeships for those who wish to gain their qualifications. We promote from within where possible and support staff to do their Certificate IV in Aged Care/Home and Community Care where relevant;*
 - *we like to employ people based on their cultural 'fit' to our organisation. If we think they would be a good carer it does not matter if they do not have a formal qualification, as we can put them through our own RTO;*
 - *it is our preferred option but are willing to take on unqualified staff and to send them to training later to gain qualifications;*
 - *yes as a minimum level of knowledge and skills. But we train our own from the time they commence their employment. It is a requirement of their employment that they undertake Certificate III. We pay for the course, if not otherwise paid for from our sources; and*
 - *preferable but not compulsory. Often staff without training are the best workers. Depends on their attitude, work ethic and particularly adhering to boundaries.*
- 38% of the respondents indicated that having a Certificate III qualification, relevant to the industry, was highly desired. 31% believed it was essential, 27% prefer it and 4% selected that it was not necessary.

Attachment 1: AQTF 2007 National Guideline for Managing Non-Compliance

Extract: Categories of (non-)compliance (page 7)

Non-compliance

The requirements of the AQTF 2007 Essential Standards for Registration have not been met based on the evidence reviewed. There are three (3) categories of non-compliance.

Minor non-compliance

The requirements of the AQTF 2007 Essential Standards for Registration have not been met based on the evidence reviewed but there is no or minor adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace.

Evidence indicates that:

- non-compliance does not demonstrate a serious breakdown of the RTO's systems for the provision of quality training and assessment;
- continuous improvement systems are in place; and
- data from the quality indicators or other sources shows that clients are generally satisfied with services and outcomes from the RTO.

Significant non-compliance

The requirements of the AQTF 2007 Essential Standards for Registration have not been met based on the evidence reviewed and there are indications of a significant adverse impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace.

Evidence indicates that:

- training and assessment systems are not sufficiently focused on quality training and assessment outcomes and meeting individual learners' needs in some areas of the RTO's operations;
- systems to continuously improve the RTO's operations are inadequate;
- data from the quality indicators or other sources shows that a range of clients have expressed dissatisfaction with services and outcomes from the RTO; and
- previously identified minor non-compliance has not been rectified or evidence of improvement within the applicable period has not been provided.

Critical non-compliance

The requirements of the AQTF 2007 Essential Standards for Registration have not been met based on the evidence reviewed and a critical adverse impact on learners and/or consumers of goods and services produced in the training environment or the current (or future) workplace is occurring or has occurred.

Evidence indicates that:

- training and assessment systems are not achieving quality training and assessment outcomes and are not meeting individual learners' needs;
- there is a breakdown in, or absence of, effective management systems;
- there is no systematic approach to continuous improvement; and
- data from quality indicators or other sources shows that there is widespread or persistent dissatisfaction with services and outcomes.

In extreme situations, evidence from audit may indicate risk of injury or death to people in the training environment or the current (or future) workplace. In such instances, the level of risk and potential impact on learners and/or other consumers of goods and services produced in the training environment or the current (or future) workplace warrants immediate rectification.

Attachment 2: Employer Survey Questionnaire

2012 Employer survey - Aged Care and Community Care

INTRODUCTION

EMPLOYER SURVEY OF TRAINING IN AGED CARE AND HOME AND COMMUNITY CARE QUALIFICATIONS IN WESTERN AUSTRALIA

The Training Accreditation Council is undertaking an audit of training of Aged Care and Home and Community Care (HACC) qualifications. This is an opportunity for you to provide valuable feedback about the training students are receiving in this industry.

SURVEY INSTRUCTIONS

You will be taken through the short survey by clicking on the "Next" button below. It should only take a few minutes to complete.

If you would prefer a hard copy of the survey to complete or to provide a verbal response please contact the Project Manager, Olivia Mayo on (08) 9441 1974 or olivia.mayo@des.wa.gov.au

Responses must be received by 10 December 2012. All responses will be kept confidential.

Employer Survey

1. What area(s) does your organisation work in? [please tick one]

- Residential Aged Care
- Community Care (e.g. Home & Community Care)
- Both
- Other (please specify)

2. Is your organisation:

- A registered training organisation (RTO)
- Affiliated with a registered training provider
- Neither
- Unsure

3. Does your organisation/facility currently have students (including trainees) who are undertaking studies in Aged Care or Community Care?

(This includes your own staff and external work placement students)

- Yes
- No

Training and work placement

2012 Employer survey - Aged Care and Community Care

1. How many students (including trainees, own staff and work placement students) are based in your facility/organisation?

(select from options given)

Other (please specify)

2. Which qualification(s) are the students enrolled in?

[You may tick more than one]

- Certificate III In Aged Care
- Certificate III In Home and Community Care
- Certificate IV In Aged Care
- Certificate IV In Home and Community Care
- Unsure
- Other (please specify)

3. What is the arrangement between your organisation/facility and the training provider?

- Formal written agreement / memorandum of understanding
- Informal arrangement with the training provider
- No arrangement in place with the training provider
- Unsure
- Other (please specify)

2012 Employer survey - Aged Care and Community Care

4. For the students you have on work placement do you.....

[Duties refers to work tasks you would expect an entry level staff member to do]

- Allow students to conduct full duties alone
- Allow students to conduct limited duties alone
- Allow students to conduct full duties under supervision
- Allow students to conduct limited duties under supervision
- Only allow students to observe staff
- Depends on the individual students
- Other (please specify)

5. What are some of the tasks students do on work placement in your organisation/facility?

Assessment in the work place

1. Who assesses the students who are on work placement in your organisation/facility?

- The Registered Training Organisation/Training Provider
- The facility or organisation's staff
- Both
- Unsure

Other (please specify)

2012 Employer survey - Aged Care and Community Care

2. How much input do you or your staff have with the assessment of the students?

[you may select more than one answer]

- sign off assessments as the assessor
- sign off on log books or other training records
- sign off as verification of work the student completed (third party verification)
- observation of students
- no input with the assessments of students
- Other (please specify)

Support for students in the workplace

1. How satisfied are you with the support your organisation/facility receives from the RTO/training provider?

	Very satisfied	Somewhat satisfied	Neither satisfied or dissatisfied	Somewhat dissatisfied	Very dissatisfied	Not applicable
Level of satisfaction	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

2. How much contact do you have with (a representative of) the RTO?

- Daily
- Weekly
- Monthly
- Every 2-3 months
- Other (please specify)
- Every 3-6 months
- Yearly
- Varies
- No contact

2012 Employer survey - Aged Care and Community Care

3. What support arrangements are in place within your organisation/facility for students?

(you may select more than one option)

- Buddy
- Mentor
- Supervisors or senior staff are available for students to contact
- Student liaison officer (or similar)
- Someone from the RTO is available for the students to contact
- Other (please specify)

Employer

Please answer the questions below as an employer and consider the requirements of an entry level employee in a care setting.

1. As an employer, how would you rate the overall ability of staff new to the Aged Care and/or Community Care industry who have recently graduated with a Certificate in Aged Care or Home & Community Care?

- Ability exceeds industry requirements
- Ability meets industry requirements
- Ability is below industry requirements

Comment (optional)

2. Do you believe students are receiving the full range of training and work experiences they need during their course to prepare them to work in the industry?

- Yes
- No

Comment (optional)

2012 Employer survey – Aged Care and Community Care

3. Which one of the statements best describes your experience with workers who have recently finished training and received their Certificate III in Aged Care or Community Care qualification?

- The workers are work ready and can 'hit the ground running'
- The workers need some minor support to be work ready
- The workers require a lot of additional training or assistance to be work ready

Comment (optional)

4. Do you find your organisation needs to do extra training (excluding company induction) after employing new graduates who have not worked in the industry before?

- Yes
- No
- Depends on staff member
- Depends on training provider

Comment (optional)

5. Are the language, literacy and numeracy skills of new graduates in your workplace adequate to carry out work to your required employment levels?

- Yes
- No
- Varies (please provide an explanation in the comment section)

Comment (optional)

6. Do you (as an employer) require staff to have the Certificate III for employment?

- Yes
- No

Comment (optional)

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7. What value do you place on prospective employees who have a Certificate III qualification (relevant to your industry)?

- Essential
- Highly desired
- Preferred
- Not necessary

Comment (optional)

Additional comments

What other information would you like to contribute about your experience or perceptions as an employer of staff?

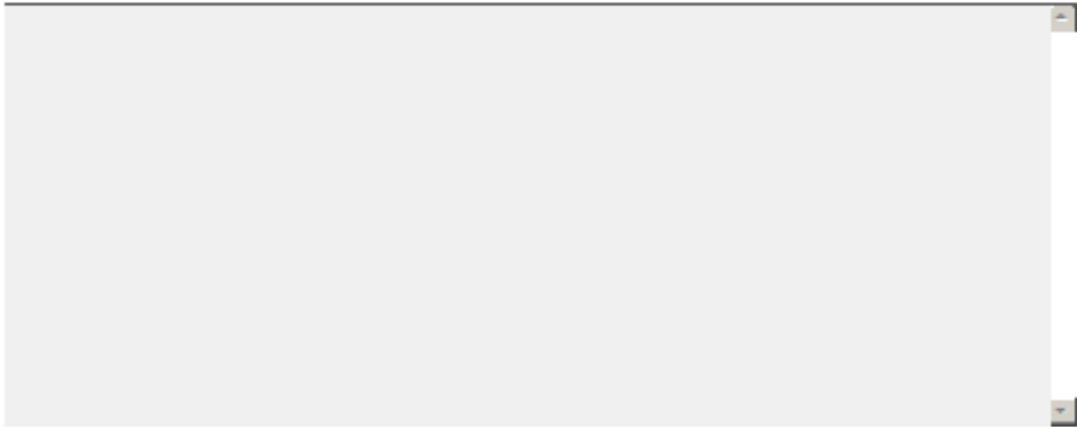
There are comment boxes below for:

- the Aged Care and Home & Community Care qualifications or Community Services training package
 - Registered Training Organisations
 - the training system
 - suggestions or improvements (related to Aged Care/HACC training in WA)
 - general comments (related to Aged Care/HACC training in WA)
- [each field is optional]

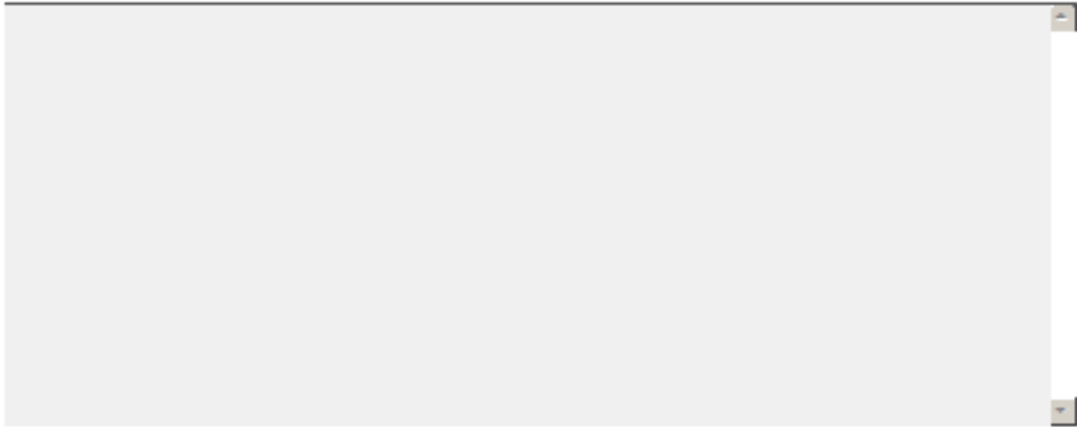
1. The Aged Care and/or Home & Community Care qualifications or Community Services training package

2012 Employer survey - Aged Care and Community Care

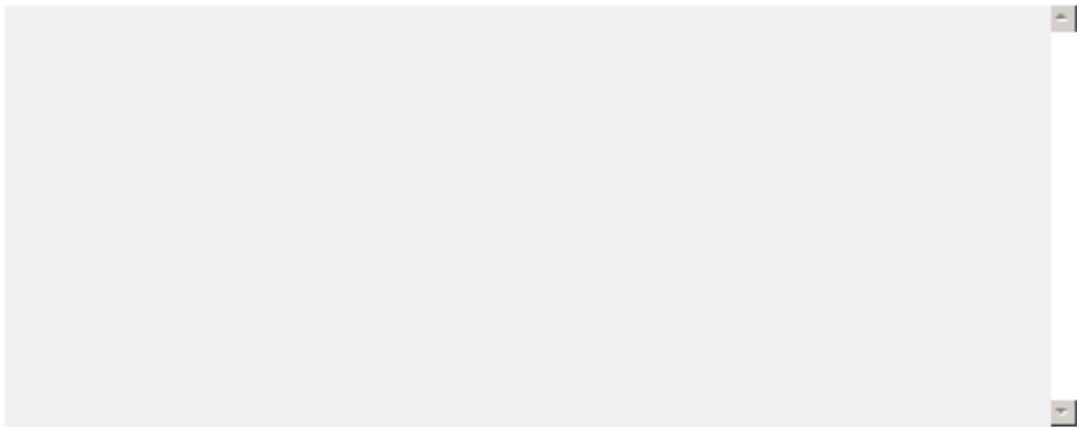
2. Registered Training Organisations

A large, empty rectangular text box with a light gray background and a thin black border. It is intended for the respondent to provide answers to question 2. There are small scroll handles on the right side.

3. The training system

A large, empty rectangular text box with a light gray background and a thin black border. It is intended for the respondent to provide answers to question 3. There are small scroll handles on the right side.

4. Suggestions or improvements (related to Aged Care/HACC training in WA)

A large, empty rectangular text box with a light gray background and a thin black border. It is intended for the respondent to provide suggestions or improvements related to Aged Care/HACC training in WA. There are small scroll handles on the right side.

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5. General comments (related to Aged Care/HACC training in WA)

Optional questions about your organisation

This information is only for analytical purposes and will not be used to identify your organisation or responses.

1. What is the approximate size of your organisation/facility?

- 1-10 employees
- 11-30 employees
- 31-50 employees
- more than 51 employees

Comment (optional)

2. Which region is your organisation's head office based?

[please select one option]

- | | | |
|--|--|--|
| <input type="radio"/> Metropolitan WA | <input type="radio"/> Mid West | <input type="radio"/> New South Wales |
| <input type="radio"/> Peel | <input type="radio"/> Gascoyne | <input type="radio"/> Victoria |
| <input type="radio"/> South West | <input type="radio"/> Pilbara | <input type="radio"/> Queensland |
| <input type="radio"/> Great Southern | <input type="radio"/> Kimberley | <input type="radio"/> Tasmania |
| <input type="radio"/> Wheatbelt | <input type="radio"/> Northern Territory | <input type="radio"/> Australian Capital Territory |
| <input type="radio"/> Goldfields-Esperance | <input type="radio"/> South Australia | <input type="radio"/> Overseas |

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3. Which geographic location(s) does your organisation operate in/service?

[you may select more than one]

- | | | |
|---|---|---|
| <input type="checkbox"/> Metropolitan WA | <input type="checkbox"/> Mid West | <input type="checkbox"/> New South Wales |
| <input type="checkbox"/> Peel | <input type="checkbox"/> Gascoyne | <input type="checkbox"/> Victoria |
| <input type="checkbox"/> South West | <input type="checkbox"/> Pilbara | <input type="checkbox"/> Queensland |
| <input type="checkbox"/> Great Southern | <input type="checkbox"/> Kimberley | <input type="checkbox"/> Tasmania |
| <input type="checkbox"/> Wheatbelt | <input type="checkbox"/> Northern Territory | <input type="checkbox"/> Australian Capital Territory |
| <input type="checkbox"/> Goldfields-Esperance | <input type="checkbox"/> South Australia | <input type="checkbox"/> Overseas |

4. Which RTO(s) are your organisation's trainees enrolled with?

- State Training Provider/TAFE
- Private Training Organisation
- Unsure
- Both

5. What is your job title? (i.e. of the person completing the survey)

Survey Completed

THANK YOU FOR COMPLETING THE SURVEY

The information will be analysed and included in the final report of the Strategic Industry Audit of Aged Care and Home & Community Care qualifications in Western Australia. It is anticipated this report will be published in 2013 and will be available on the Training Accreditation Council's website (www.tac.wa.gov.au).

Please contact the TAC Secretariat on (08) 9441 1910 if you have any questions regarding this survey.