Community Services

Strategic Industry Audit Report

Strategic Industry Audit into the Community Services,
Aged Care, Disability,
and Home and Community Care Sectors

**Final Report
October 2021**

TWD/D21/1225977

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1. Executive Summary

Every two years the Training Accreditation Council (TAC or the Council) prepares a Regulatory Strategy that informs stakeholders about the priorities the Council has identified as posing risks to the quality of vocational education and training (VET) during that period and the planned regulatory action to monitor and minimise those risks.

The *Focus on Quality: TAC Regulatory Strategy 2019-2021* identified community services as an area of focus and indicated that the Council would monitor compliance, undertake research and stakeholder consultation to inform the development of the regulatory response. In April 2021, the Council endorsed a strategic industry audit (SIA) of registered training organisations (RTOs) within the Council's jurisdiction, that deliver nationally recognised qualifications in the community services, aged care, disability and home and community care sectors in Western Australia (WA).

The Community Services SIA was undertaken due to:
- previously identified levels of non-compliance at main audit of RTOs delivering community services qualifications;
- industry stakeholder concerns regarding the quality of training and assessment and more specifically the quality of VET delivered to secondary students (VDSS) and traineeship pathways; and
- outcomes of the Commonwealth Government's final report on the *Royal Commission into Aged Care Quality and Safety (2021)*.

The audit scope investigated whether there were systemic issues related to the quality of training and assessment, the implementation of mandatory work placement arrangements (where applicable), and the quality of VET delivered to secondary schools (VDSS) and traineeships.

The SIA was conducted between **May and July 2021** and involved a total of **16 TAC RTOs** with one or more of the following **four qualifications** on their scope of registration, and included a number of common units of competency that aligned to specific stakeholder concerns:

- *CHC33015 Certificate III in Individual Support;*
- *CHC42015 Certificate IV in Community Services;*
- *CHC43015 Certificate IV in Ageing Support; and*
- *CHC43115 Certificate IV Disability*.

RTO and student surveys and employer interviews (where relevant) were conducted to obtain insights into RTO practices, student's training experience and to confirm audit outcomes.

1.1 Key findings of the SIA
The SIA did not identify any systemic issues, and concerns earlier expressed by stakeholders were not evident in relation to RTOs audited.

The SIA results indicate:
- 81% of RTOs (13 out of 16) achieved compliance at main audit;
- there was an improvement in compliance in the four qualifications audited during the SIA when compared to audit outcomes before the SIA; and

- of the non-compliances identified in three RTOs:
    - o two of the three RTOs were identified with an overall level of significant[1] non-compliance and one was minor;
    - o the non-compliant RTOs all achieved compliance following the standard 20 days rectification period; and
    - o the type of non-compliances were not common between RTOs.

Key findings indicate that RTOs are meeting the requirements of the training package and are deeply engaged with the community services sector to ensure industry expectations are met in training delivery and assessment. All RTOs provided strong evidence of industry engagement with employers and industry which was reflected in training and assessment strategies being developed to meet industry expectations.

Survey results confirmed overall audit findings:
- employers interviewed reported positive experiences with RTOs and noted that feedback on training delivery was incorporated into RTO practice; and
- student survey results indicated the majority of students were satisfied with their training and felt that their training prepared them for the workplace.

RTOs maintained their responsibility for organising work placements and there was no systemic evidence of third parties being responsible for undertaking the assessment on behalf of the RTO. Auditors acknowledged the positive aspects of RTOs that had diverse student cohorts which in turn, meet the needs of diverse client groups in the community services sector.

There was no evidence to support concerns raised by stakeholders related to the quality of online delivery, training and assessment, VDSS delivery and support services provided by RTOs to students.

1.2 Actions

Based on the outcomes of the SIA, the Council will:

1. Develop TAC guidance materials to showcase RTO good practice in the community services sector including examples of industry engagement, training delivery models, and RTO training facilities and equipment which contribute to quality VET outcomes.

2. Develop a TAC education program workshop/webinar on industry engagement using good practice examples from the community services sector.

3. Within 12 months of the SIA, undertake monitoring audits of those RTOs found significantly non-compliant at main audit, to ensure those RTOs continue to meet their compliance obligations.

4. Share the findings of the Community Services SIA with the Australian Skills Quality Authority (ASQA), the Victorian Registration and Qualifications Authority (VRQA), the WA training council - *CommunitySkills WA,* and other stakeholders including relevant government agencies.

5. Continue to monitor outcomes arising from the Commonwealth Government's *Royal Commission into Aged Care Quality and Safety* and the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability* to consider any emerging issues regarding the quality of training.

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[1] Two possible outcomes can result from a TAC audit: compliance or non-compliance. Audit reports indicate an overall level of non-compliance – minor, significant or critical. These levels are described in detail on TAC's website.

2. Background

To determine the scope and outcomes of the SIA, the following strategies were utilised:

- research including analysis of the outcomes from the final report of the Commonwealth Government's *Royal Commission into Aged Care Quality and Safety (2021)*;
- stakeholder consultation with the Department of Training and Workforce Development, the WA training council - *CommunitySkills WA*, the Department of Education, peak bodies including Aged and Community Services Australia, and other relevant peak industry stakeholders;
- RTO surveys to refine audit scope by determining RTO enrolments, work placement arrangements and industry engagement;
- data analysis including audit outcomes and compliance levels;
- student surveys to confirm audit outcomes and RTO survey results; and
- employer interviews (where applicable).

During the scoping phase for the SIA, stakeholders raised concerns about the quality of training including RTOs meeting the requirements of the training package, assessment, implementation of mandatory work placements, high volume of enrolments, amount of training, industry currency of trainers and assessors and online delivery.

Based on analysis of the 2019-2020 compliance trends, the Council also held some concerns regarding the quality of training of RTOs with the qualifications on scope. In November 2020, the Council wrote to RTOs citing issues identified relating to the quality of training, and the subsequent potential impact on students and employers. The Council reminded RTOs that it would continue to monitor delivery of training products in this sector.

At its April 2021 meeting, the Council agreed to the scope of the SIA including:

- four qualifications in the CHC Community Services Training Package including:
  o *CHC33015 Certificate III in Individual Support;*
  o *CHC42015 Certificate IV in Community Services;*
  o *CHC43015 Certificate IV in Ageing Support;* and
  o *CHC43115 Certificate IV Disability*.

- four units of competency from each of the qualifications that aligned to stakeholder concerns in relation to: providing a client-centred approach to service provision; supporting students with low literacy to read and interpret personal care plans and prepare reports; practical competency in manual handling; and nutrition.

- RTOs that met the following characteristics:
  o delivered the qualifications through VDSS and/or traineeship pathways;
  o had not been audited in community services qualifications in the previous 36 months; and/or
  o had been the subject of complaint enquiries.

- the Standards and Clauses in the audit scope were selected based on those:
  o with previous high levels of non-compliance;
  o related to third party arrangements (where applicable);
  o that addressed stakeholder concerns including:
    ▪ meeting the requirements of the training package;
    ▪ amount of training;
    ▪ assessment;
    ▪ responsiveness to industry and student needs;

- ▪ vocational competency and industry currency of trainers and assessors;
- ▪ implementation of the mandatory 120 hours of work placement;
- ▪ online delivery; and
- ▪ marketing to prospective students.
- The following clauses were identified for audit:
  - o **Standard 1** - 1.1, 1.2, 1.2a, 1.2b, 1.2c, 1.3, 1.3a, 1.3b, 1.3c, 1.3d, 1.6, 1.6a, 1.6b, 1.7, 1.8, 1.8a, 1.8b, 1.13, 1.13a, 1.13b, 1.13c, 1.14

  - o **Standard 4** - 4, 4.1, 4.1e (where applicable), 4.1f (where applicable), 4.1l, 4.1l i, 4.1l ii, 4.1l iii

  - o **Standard 5** - 5, 5.1, 5.2, 5.2a, 5.2b, 5.2b i, 5.2b ii, 5.2b iii, 5.2b iv, 5.2b v, 5.2c, 5.2d, 5.2d i, 5.2d ii, 5.2e, 5.2e i, 5.2e ii, 5.2e iii, 5.2f.

Based on the above criteria, **20 RTOs were identified** with the relevant qualifications on scope of registration. Of these, **four RTOs were not included** in the audit sample as they had been audited in the six months prior to finalising the scope of the review. This decision was based on the principle of reducing regulatory burden. **In total, 16 RTOs were included** in the SIA and were audited between **May and July 2021**.

3. RTO and Student Surveys

RTO and student surveys were conducted to assist in determining the SIA scope and confirm audit outcomes. Survey questions sought information regarding: RTO enrolments; information provided to students; delivery methods (classroom, online, blended, traineeships); work placements; industry engagement; vocational competency and industry currency of trainers and assessors; facilities, resources and support provided to students; student reasons for undertaking training and satisfaction with the training provided; and the impact of COVID-19.

3.1 RTO Surveys
RTO survey findings are detailed below.

2020 Enrolments
- RTOs reported *CHC33015 Certificate III in Individual Support* (consisting of enrolments in aged care, disability and home and community specialisations) accounted for the majority of enrolments in the four qualifications.
- RTOs reported less than 100 enrolments in *CHC43015 Certificate IV in Ageing Support*.

Work Placement
Of the 16 RTOs surveyed:
- 75% (12 RTOs) advised they organised work placement.
- 19% (3 RTOs) advised either the RTO, student or another organisation organised work placement across various qualifications.
- The remaining one RTO only delivers the *CHC42015 Certificate IV in Community Services,* which does not have a mandatory work placement requirement.

Industry Engagement
All RTOs provided evidence of industry and community engagement. This was recognised as an area of significant strength in the SIA and is outlined later in the report.

3.2 Student Surveys

Students were surveyed as part of the audits and findings support the outcomes of the SIA. There were 897 responses received (19% response rate[2]) and a summary of student survey responses are indicated in this section.

Due to the nature of conducting surveys with VDSS students, the number of survey responses received from students in this pathway were low. Of the total 897 survey responses received, only 24 (3%) were VDSS responses which therefore cannot be used to identify trends or confirm audit findings as responses may not be representative of the overall VDSS view. VDSS responses are indicated separately in the sections below.

Work Placement
- 92% of students (466 out of 506)[3] felt they were prepared for the workplace; and
- 88% of students (443 out of 506) indicated they gained the skills needed from their workplace supervisor.

Training
VDSS responses:
- Of the 24 VDSS responses received:
  - 83% (20 out of 24) were satisfied with their student experience;
  - 92% (22 out of 24) agreed they have access to trainer support when required;
  - 88% (21 out of 24) would recommend their RTO; and
  - 71% (17 out of 24) undertook online learning.

Non-VDSS responses:
- Of the total 897 responses received, 873 (97%) were non-VDSS responses.
- Of the 873 non-VDSS responses received:
  - 81% (662 out of 821) were satisfied with their student experience;
  - 82% (669 out of 820) agreed they have access to trainer support when required;
  - 82% (675 out of 821) would recommend their RTO; and
  - 49% (406 out of 821) undertook online learning.

Analysis of negative survey responses from VDSS and non-VDSS students were conducted. The small number of negative survey responses (25 responses) were from students across a range of RTOs including those compliant at main audit. Responses indicated a small number of students were dissatisfied with:
- the support provided by trainers, turnover of staff, lack of communication from trainers, and perceptions of staff being unqualified; and
- technical issues and trainers being unfamiliar with online tools.

Support Services and Resources
- 80% of students (680 out of 845) indicated that sufficient information was provided to them prior to commencing and that the services provided matched pre-enrolment information.
- Responses supported claims that support services were offered to students including literacy and numeracy support, career advice, mentoring or adjustments for physical access.

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[2] Statistically significant sample based on the number of responses sent and received in the student survey.
[3] Not all students surveyed responded to all survey questions.

Impact of COVID-19

Student survey responses relating to the impact of the COVID-19 lockdown included:

- 43% of respondents indicated there was no change to how they did their training;
- 27% of respondents indicated they spent more time learning online[4];
- 25% indicated there was less time spent at RTO premises; and
- 17% of respondents indicated 'other' issues including facing delays in undertaking their work placement and prolonging the duration of their course.

In general, of the 450 valid responses, students indicated some suggestions for improving their experiences including:

- improving communication and interaction with students;
- addressing technical issues relating to online training;
- updating training materials to reflect relevance to current market and industry; and
- participating in more workplace based training to gain real-life experience.

4. Community Services SIA Data Analysis

The following data sources were used in the analysis of the SIA outcomes including:

- Total VET Activity (TVA) 2019; and
- TAC's Customer Relationship Management (CRM) database system, at 31 July 2021.

4.1 TVA data 2019

According to TVA 2019 data:

- **38 RTOs** delivered the four community services qualifications in scope in WA;
- of which **16**[5] were **TAC registered RTOs**;
- these 16 RTOs accounted for **58% of enrolments** in the four qualifications; and
- the *CHC33015 Certificate III in Individual Support* and the *CHC42015 Certificate IV in Community Services* accounted for 95% of the total CHC enrolments.

4.2 Audits

To assist in the analysis of compliance trends, audit data available prior to the Community Services SIA is provided alongside the SIA audit outcomes. The two data sets are referred to as:

1. RTOs with the relevant CHC training products on scope of registration subject to audits between **1 July 2018 – 30 April 2021** are identified as *'before strategic audit'*.
   Before audit data includes outcomes from all audits including applications and monitoring.

2. RTOs audited in the conduct of the **CHC SIA** are referred to as *'during strategic audit'*.
   During audit data includes outcomes from monitoring audits only.

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[4] In distance and online training and assessment, the learner and the instructor are separated by time and distance. The use of technology, such as email, discussion boards, audio and video conferencing replaces the physical presence in the classroom. Distance and online training and assessment can occur between trainer/assessor and a learner or a group of learners, or in a combination; TAC Fact Sheet: Distance and Online Training and Assessment

[5] In 2021, this number increased to 20 TAC registered RTOs with the four community services qualifications on scope.

4.3 Overall compliance – main audit outcome – *during strategic audit*

The table below indicates the number of audits and outcomes identified in the SIA.

## Overall compliance *during* the SIA
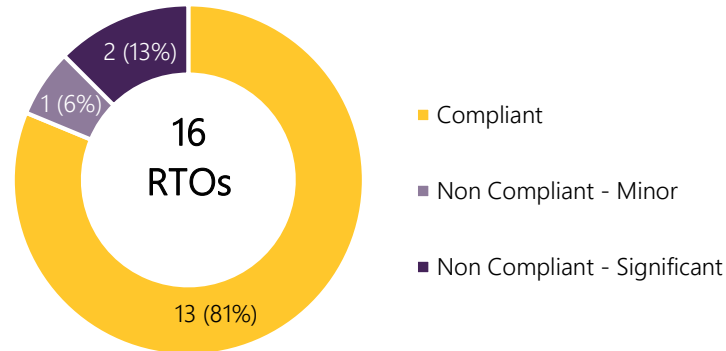
- Of the 16 RTOs that were audited in the SIA, 13 RTOs (81%) were compliant at main audit while three (19%) were non-compliant.
- Of the three non-compliant RTOs, two were identified with an overall level of significant non-compliance and one was minor.
- **All three non-compliant RTOs achieved compliance following the standard 20 working days rectification period.**
- Non-compliances were in different clauses for each of the three RTOs and are detailed later in this report.

4.4 Overall compliance of qualifications – *before* and *during* the SIA

Analysis of the four qualifications included in the SIA was conducted to compare overall compliance *before* and *during* the strategic review. The purpose of this comparison is to identify if overall compliance has improved over time.

Overall compliance of qualifications
- *before* and *during* the SIA
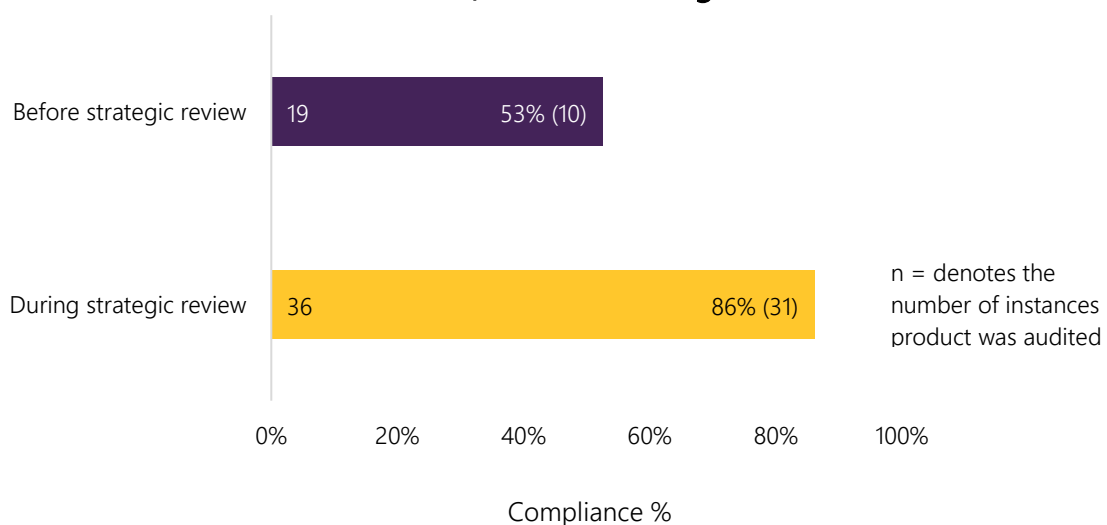
- Between July 2018 – April 2021, 10 RTOs were audited against the relevant qualifications. These qualifications were audited a total of 19 times[6].
- Audit outcomes from *before* the SIA indicate that almost half of all audits were non-compliant.
- There was an improvement in compliance in the four qualifications audited *during* the SIA when compared to audit outcomes *before* the SIA.
- Of the four qualifications audited *during* the SIA, 31 out of 36 instances[7] (86%) were found to be compliant compared to 10 out of 19 instances (53%) found to be compliant before audit.

This improvement in audit outcomes could suggest the RTOs' increased commitment to address gaps in quality to meet the Standards. Results could also be attributed to:
- earlier audits were at a time when RTOs were transitioning to new endorsed qualifications. As these are now fully embedded into RTO delivery, previous non-compliances have been addressed;
- the TAC Education Program has successfully assisted RTOs in addressing areas of non-compliance prior to the SIA; and/or
- the letter from the Council prompted RTOs to improve their practice.
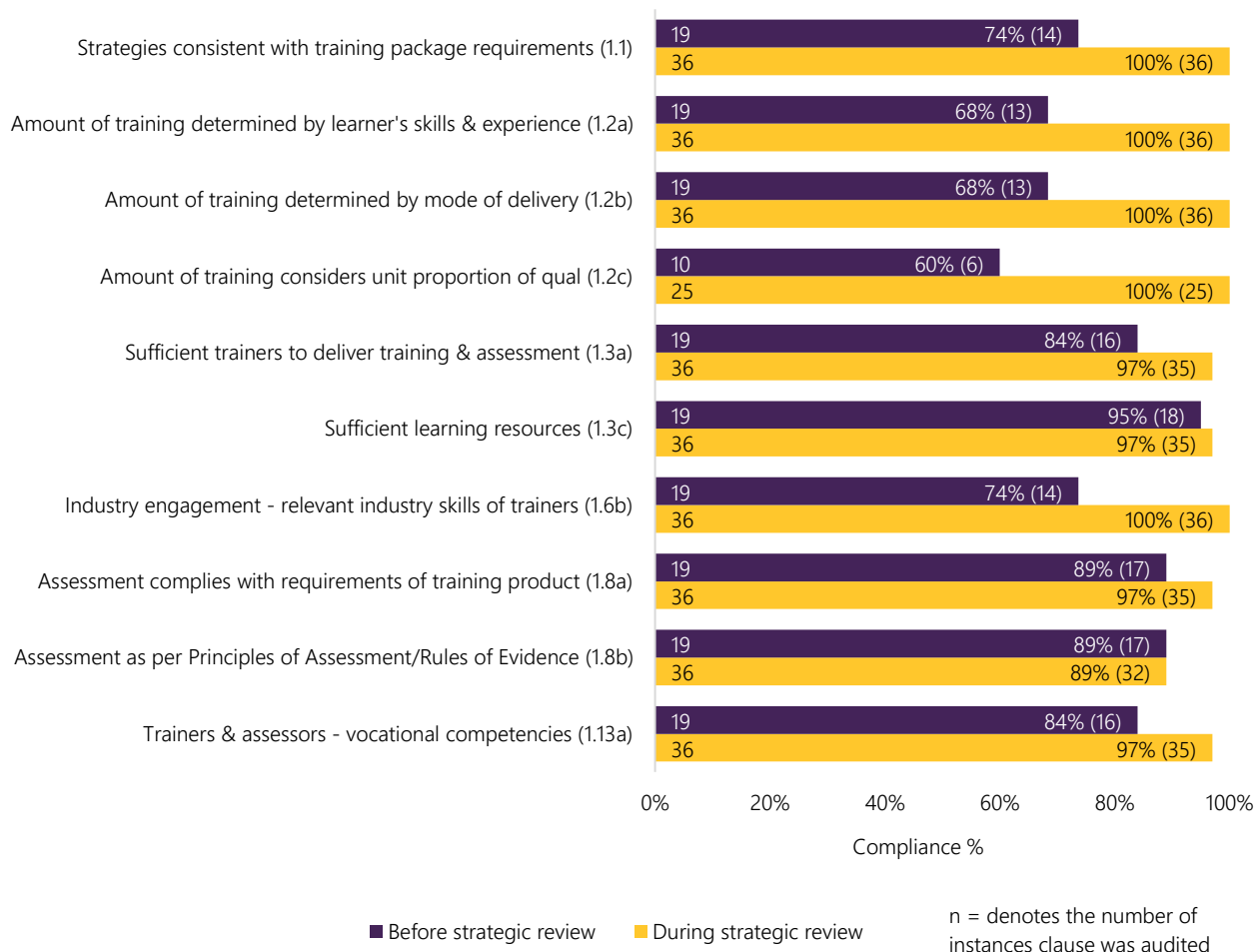
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[6] An audit of an RTO may contain multiple training products.

[7] Number of qualifications audited across all audits.

4.5 Comparison of non-compliant clauses – *before* and *during* SIA

Non-compliances identified *during* the SIA were compared with data *before* the SIA to investigate if non-compliances found *during* have improved on previous levels.

Compliance *before* and *during* the SIA

Strategies consistent with training package requirements (1.1)
- 19 — 74% (14)
- 36 — 100% (36)

Amount of training determined by learner's skills & experience (1.2a)
- 19 — 68% (13)
- 36 — 100% (36)

Amount of training determined by mode of delivery (1.2b)
- 19 — 68% (13)
- 36 — 100% (36)

Amount of training considers unit proportion of qual (1.2c)
- 10 — 60% (6)
- 25 — 100% (25)

Sufficient trainers to deliver training & assessment (1.3a)
- 19 — 84% (16)
- 36 — 97% (35)

Sufficient learning resources (1.3c)
- 19 — 95% (18)
- 36 — 97% (35)

Industry engagement - relevant industry skills of trainers (1.6b)
- 19 — 74% (14)
- 36 — 100% (36)

Assessment complies with requirements of training product (1.8a)
- 19 — 89% (17)
- 36 — 97% (35)

Assessment as per Principles of Assessment/Rules of Evidence (1.8b)
- 19 — 89% (17)
- 36 — 89% (32)

Trainers & assessors - vocational competencies (1.13a)
- 19 — 84% (16)
- 36 — 97% (35)

Compliance %

■ Before strategic review   ■ During strategic review

n = denotes the number of instances clause was audited

- *Before* the SIA, five clauses were noted as an area of concern:
  - *Clause 1.2c, amount of training – units proportion of qualification (60% compliance);*
  - *Clause 1.2a,* amount of training – learner's skills and experience (68% compliance);
  - *Clause 1.2b,* amount of training – mode of delivery (68% compliance);
  - *Clause 1.1,* strategies consistent with training package requirements (74% compliance); and
  - *Clause 1.6b,* industry engagement (74% compliance).

- *During* the SIA, the above clauses were **fully compliant** (100% compliance) across all 16 audits.

- *During* the SIA, there were only three non-compliant audits, and therefore fewer clauses that were non-compliant when compared to *before* the SIA. While the following clauses were found to be non-compliant *during* the SIA, the instances of non-compliance for most of these clauses have also decreased over time:
  - *Clause 1.8b,* assessment as per Principles of Assessment/Rules of Evidence;
  - *Clause 1.3a,* sufficient trainers for training and assessment;
  - *Clause 1.3c,* sufficient learning resources;

- o *Clause 1.8a,* assessment complies with requirements of training product; and
- o *Clause 1.13a,* vocational competencies of trainers and assessors.

- The overall increase in compliance level over time suggests RTOs may have taken on feedback from the previous audits and education programs to address areas of non-compliance.

5. Strategic Industry Audit Outcomes

Analysis of the audit reports provided insight into non-compliances as well as providing examples of good practice.

The SIA investigated specific concerns identified during stakeholder consultations including online delivery, quality of training undertaken in VDSS and traineeship pathways and support for students in relation to language, literacy and numeracy (LLN) requirements. The SIA **did not identify any systemic issues** and concerns earlier expressed by stakeholders were not evident in relation to RTOs audited.

Specifically:

- there was no evidence of issues related to the quality of online delivery. Audits identified that while online delivery was taking place, all assessments were undertaken face-to-face;

- where relevant, audits included interviews with employers engaged in traineeship arrangements and no issues with the quality of training and assessment were identified;

- there was minimal VDSS in the four qualifications audited. Where delivery was being undertaken, no issues were identified through audits; and

- in relation to LLN requirements, no issues were identified with how RTOs were providing support to students.

Overall there were **no systemic issues** identified in the SIA. Non-compliances were identified in only **three RTOs** and were **not common** between those RTOs.

Non-compliances identified at main audit included:

- **Two RTOs** were significantly non-compliant in Clauses 1.3, 1.3a, 1.3c. Audits indicated that the two RTOs did not initially provide evidence that learning materials addressed all requirements of the units of competency including the elements and performance criteria, foundation skills, performance evidence, knowledge evidence and assessment conditions; and that student resources needed to be accessible to the student regardless of location or mode of delivery.

- **Two RTOs** were significantly non-compliant in Clauses 1.8, 1.8a, 1.8b. Audits initially found assessment practices were not being undertaken in accordance with the principles of assessment (reliability); inconsistent implementation of RTO documented assessment practices; student records did not contain examples of assessment judgements; and lack of evidence of relevant documentation to support competence.

- **One RTO** was found minor non-compliant in Clauses 1.13, 1.13a. The audit found the RTO did not initially provide evidence that training and assessment was being delivered only by trainers and assessors who have vocational competencies at least to the level being delivered and assessed.

Non-compliant RTOs were provided the opportunity to submit further evidence to demonstrate compliance. **All RTOs achieved compliance** following the rectification period.

6. RTO Good Practice Identified at Audit

A number of RTO good practice examples were identified in the SIA. These included:

- strong industry engagement between the RTO and employers/industry;

- evidence that RTOs use the outcomes of this engagement, and are reflected in the RTO's training and assessment strategies and practices of the RTO to ensure relevance;

- employers interviewed were positive about RTOs ensuring their feedback is reflected in the training delivery;

- examples noted by auditors included:

  o strong partnerships between an RTO and hospital;
  o well established RTO training facilities designed with input from industry and simulated real workplace environments;
  o enterprise RTOs with extensive training facilities and strong workplace arrangements with employers. In turn these employers acknowledged students as being knowledgeable, confident and work ready;
  o in some instances, in conjunction with industry partners, work experience was used as part of the student selection process, for example, in the Certificate III in Individual Support (disability specialisation); and
  o work placements provided an opportunity for employers to recruit and select staff in their agencies once students had completed their training.

- RTOs maintained their responsibility for organising work placements;

- no systemic evidence of third parties being responsible for undertaking the assessment on behalf of the RTO; and

- auditors acknowledged the positive aspects of RTOs that had diverse student cohorts which in turn, meet the needs of diverse client groups in the community services sector.

7. Summary

Overall key findings of the SIA indicate that RTOs are now meeting the requirements of the training package and are deeply engaged with the community services sector to ensure industry expectations are met in training delivery and assessment. RTOs are to be commended on the good results achieved in the SIA.

While the monitoring audits did not identify systemic issues, TAC will continue to monitor outcomes arising from the Commonwealth Government's *Royal Commission into Aged Care Quality and Safety* and the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability* to consider any emerging issues regarding the quality of training.

8. Actions

Based on the outcomes of the SIA, the Council will:

1. Develop TAC guidance materials to showcase RTO good practice in the community services sector including examples of industry engagement, training delivery models, and RTO training facilities and equipment which contribute to quality VET outcomes.

2. Develop a TAC education program workshop/webinar on industry engagement using good practice examples from the community services sector.

3. Within 12 months of the SIA, undertake monitoring audits of those RTOs found significantly non-compliant at main audit, to ensure those RTOs continue to meet their compliance obligations.

4. Share the findings of the Community Services SIA with the Australian Skills Quality Authority (ASQA), the Victorian Registration and Qualifications Authority (VRQA), the WA training council - *CommunitySkills WA,* and other stakeholders including relevant government agencies.

5. Continue to monitor outcomes arising from the Commonwealth Government's *Royal Commission into Aged Care Quality and Safety* and the *Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability* to consider any emerging issues regarding the quality of training.