



REPORT

Audit report: Lawson College Australia Pty Ltd

Date/s of audit: 24-25/07/2018

Date report created: 27/07/2018

Date report updated: 16/11/2018

Organisation details

Organisation's legal name:	Lawson College Australia Pty Ltd
Trading name/s:	Lawson College Australia
RTO number:	40679
CRICOS number:	03406J

Audit team

Lead auditor:	Ian Penna
Assistant/s:	N/A

Audit details

Application number/s:	RENVET0003641	
Audit number:	AUDREC0008343	
Audit reason	Application - renewal (VET)	
Address of site/s visited:	Level 2, 228-234 Lonsdale Street, Dandenong, VIC 3175	
Date/s of audit:	25/07/2018	
Organisation's contact for audit:	Mr Vikram Sharma v.sharma@lawsoncollege.edu.au	CEO 0419 352 299

Original finding at time of audit

Audit finding: Concerning non-compliance

Report completed by: Ian Penna

Practice	Standards for RTOs 2015	Finding
Marketing/ Recruitment	4.1	Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	Compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.1, 1.2, 1.3, 1.13-1.18, 1.20 1.8	Compliant Not Compliant
Completion	3.1	Compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	Compliant

Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 31/10/2018 : Compliant

Report completed by: Ian Penna

Practice	Standards for RTOs	Finding
Training and Assessment	1.8	Compliant

Background

Lawson College Australia Pty Ltd (the RTO) was registered as an RTO commencing 6 June 2013. The current status of the RTO's registration is expired with registration continuing whilst their renewal application is considered. Lawson College are also approved for registration on CRICOS commencing 9 February 2015. Their CRICOS registration is due to cease on 8 February 2020.

On 11 July 2016, ASQA informed the RTO of its decision to cancel Lawson College's registrations (VET and CRICOS). The RTO subsequently lodged an appeal in the AAT against ASQA's decisions. An agreement was reached for the provider's registration to continue until a renewal application is considered. The RTO submitted an application for renewal of registration (VET) on 22 February 2018.

The RTO is a private company that is owned jointly by Mr Vikram Sharma and Ms Kiran Sharma. Neither the owners, nor senior members of staff, have a current association(s) with other registered training providers.

The RTO is a member of the Australian Trade and Investment Commission (Austrade) and participates in Austrade led missions to various countries.

The RTO is an authorised 'test venue' for the Occupational English Test, an English Language Test for healthcare professionals. The organisation has a clinical skills laboratory approved by the Australian Nursing and Midwifery Accreditation Council.

The RTO's current provider risk rating with the Department of Home Affairs for the 2017/18 year stands at 2.0 with a risk index of 1.73. This is considered favourably as a low risk.

The RTO's executive officers have vast experience and knowledge in the education, training, and financial management sectors, working with Universities, TAFE Institutes and financial institutions.

Summary of organisation and management structure:

- CEO (Vikram Sharma)
- Administration Director (Kiran Sharma)
- Academic Executive Dean (Dianne Thompson)
- Student Welfare (1)
- Learner Skills Advisor (1)
- Trainers and Assessors (6)
- Student and Administrative Support (4)

The RTO also engages consultancy support from Sally Tansley and Sameer Mathur to assist with business and compliance matters.

Scope of registration:

- *BSB50215 - Diploma of Business*
- *BSB51915 - Diploma of Leadership and Management*
- *BSB61015 - Advanced Diploma of Leadership and Management*
- *CHC33015 - Certificate III in Individual Support*
- *CHC43015 - Certificate IV in Ageing Support*

The RTO is approved to deliver these courses (above) to both domestic and overseas students.

Lawson College Australia is also approved to deliver non-accredited training courses in health services. The RTO division of the organisation does not deliver these non-accredited courses, and as such, none of the RTO's resources are allocated or consumed by this non-accredited training. These non-accredited courses do not generate a revenue stream for the RTO.

Suburb and state of all delivery locations:

- Level 2, 228-234 Lonsdale Street, Dandenong VIC 3175.

Third party usage:

- No third party arrangements are in place for the delivery of training and assessment.

Core clients/target groups:

- The RTO only delivers training to overseas students. Students are enrolled predominantly from the Philippines (90%). Most students that are enrolled have already attained tertiary level qualifications overseas in sectors such as nursing, engineering, business and management.

Training Revenue (Funded or fee for service):

- Students are full-fee paying overseas students.

Total number of current enrolments in RTO as at audit date included: 162

- *BSB50215 - Diploma of Business* (25)
- *BSB51915 - Diploma of Leadership and Management* (27)
- *BSB61015 - Advanced Diploma of Leadership and Management* (0)
- *CHC33015 - Certificate III in Individual Support* (0)
- *CHC43015 - Certificate IV in Ageing Support* (110)

The RTO is approved to deliver training and assessment at their head office location in Dandenong to a maximum student capacity totalling 270. The RTO had a total of 367 CoEs with the status of studying, saved, pending, approved, or visa granted at the time of the audit.

In preparing the audit report, consideration has been given and reference made, where relevant, to:

- Information provided by students as part of a student survey or interview.
- Information provided directly by Lawson College Australia Pty Ltd to ASQA
- Existing information and records held by ASQA concerning Lawson College Australia Pty Ltd
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Lawson College Australia Pty Ltd conducted on 24 – 25 July 2018.
- Other publicly available information - including but not limited to, information published on the organisation's and third party websites.

Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
<i>BSB50215</i>	<i>Diploma of Business</i>	Face to face	25
<i>BSB51915</i>	<i>Diploma of Leadership and Management</i>	Face to face	27
<i>CHC43015</i>	<i>Certificate IV in Ageing Support</i>	Face to face	110

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

Interviewees

Name	Position	Training products
Vikram Sharma	CEO	All
Kiran Sharma	Director	All
Dianne Thompson	Executive Dean	All

Sally Tansley	Consultant	-
Sameer Mathur	Consultant	-

About this Report

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

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

Correcting non-compliance may require:

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

Original Action required by RTO

Lawson College Australia Pty Ltd did not meet all requirements for Clause 1.8.

Remedial action is required for the following training products:

BSB50215 - Diploma of Business

- *BSBHRM513 - Manage workforce planning*

BSB51915 - Diploma of Leadership and Management

- *BSBLDR502 - Lead and manage effective workplace relationships*
- *BSBRSK501 Manage risk*

CHC43015 - Certificate IV in Ageing Support

- *CHCDIV001 - Work with diverse people*
- *CHCPAL001 - Deliver care services using a palliative approach*

The RTO is required to provide evidence that demonstrates:

Training and Assessment Practices:

Clause 1.8

- The organisation has corrected its assessment system for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
 - include the full suite of assessment tools for the non-compliant training products sampled; and
 - demonstrate the RTO will implement an assessment system that ensures assessment:
 - complies with the assessment requirements of the relevant training package(s); and
 - is conducted in accordance with the Principles of Assessment and Rules of Evidence.
- It has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled. Remedial action needs to cover students who were assessed in the past 6 months for the aforementioned qualifications.

Areas of non-compliance

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.8

*Original Finding: **Not compliant***

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

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

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

Table 1.8.1 Principles of Assessment

Fairness	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.</p>
Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none">• reflecting the learner's needs;• assessing competencies held by the learner no matter how or where they have been acquired; and• drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none">• assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance;• assessment of knowledge and skills is integrated with their practical application;• assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and• judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>

Table 1.8.2 Rules of Evidence

Validity	<p>The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.</p>
Sufficiency	<p>The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.</p>

Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

BSB50215 - Diploma of Business

BSB51915 - Diploma of Leadership and Management

CHC43015 - Certificate IV in Ageing Support

The following was reviewed in relation to the RTO's training delivery and assessment practices:

- Assessment tools for:
 - *BSB50215 - Diploma of Business*
 - *BSBHRM513 - Manage workforce planning*
 - *BSB51915 - Diploma of Leadership and Management*
 - *BSBLDR502 - Lead and manage effective workplace relationships*
 - *BSBRSK501 Manage risk*
 - *CHC43015 - Certificate IV in Ageing Support*
 - *CHCDIV001 - Work with diverse people*
 - *CHCPAL001 - Deliver care services using a palliative approach.*
- The assessment tools reviewed at audit:
 - Assessment methods matrix
 - Training outline
 - Map assessment conditions & resources
 - Training and assessment strategy
 - Delivery and assessment schedule
 - Assessment Marking Guide.
- Student files:
 - LCA16-0020
 - LCA16-0022
 - LCA16-0048
 - LCA17-0082
 - LCA17-0083
 - LCA17-0084
 - LCA17-0094
 - LCA17-0099
 - LCA18-0137
 - LCA18-0146
 - LCA18-0157.
- Evidence was sighted demonstrating how the RTO had managed a previous incidence of plagiarism (November 2017). The outcome from implementing their plagiarism policy and procedure required the student to re-sit the assessment task.

The RTOs assessment practices are not compliant with the requirements of Clause: 1.8 of the Standards for RTOs 2015.

The RTO has not demonstrated that it has developed and implemented an assessment system to ensure it complies with the assessment requirements of the BSB Business Services, and CHC Community Services Training Packages, and is conducted in accordance with the Principles of Assessment and the Rules of Evidence.

Evidence of non-compliant training and assessment practices include, but not limited to:

- **Reliable** – The RTO's assessment strategy does not ensure that assessment tools will be consistently applied and interpreted, and assessment results will be comparable irrespective of the assessor conducting the assessment. For example, but not limited to:

- *CHCPAL001 - Deliver care services using a palliative approach*

The review of five completed student assessments found students were deemed to have demonstrated competence for each of the required knowledge and skills, despite finding evidence of not providing suitable responses to knowledge based assessment tasks when referenced to the RTO's Assessment Marking Guide. For example, students LCA17-0094 and LCA17-0099 both included references to legislation that was not identified in the marking guide for assessment task 1 (q.7), and providing inadequate responses to assessment task 2, case study 5.

For assessment task 3 – *role play for a palliative care plan*, the students' responses recorded in 'The Adverse Events' table were all assessed to be satisfactory. The RTO was unable to explain how the evidence recorded on these student files could be considered reliable when responses were not aligned with the marking guide, and in some cases included multiple levels of 'symptomatic status ranging from 'None' to 'Moderate'.

The RTO agreed at audit their assessment task instructions to both the student and the assessor were not clear.

- **Valid and Sufficient:** The evidence reviewed did not demonstrate the RTO's assessment tools will gather sufficient evidence to confirm competency against all elements of the unit of competence. For example, but not limited to:
 - *CHCPAL001 - Deliver care services using a palliative approach*
The RTO's evidence refers to a mapping of the required knowledge and skills contained in their Assessment Marking Guide. The document presented did not describe which assessment tasks would provide evidence for each of the required knowledge elements listed in the training product. For example, *the needs of people dealing with a life-threatening or life-limiting illness and the emotional impact of diagnosis*.
- **Authenticity:** The implementation of the RTO's current assessment strategy did not demonstrate the assessor is assured that the evidence presented for assessment is the learner's own work. For example, students LCA17-0094 and LCA17-0099 both provided identical inadequate responses to assessment task 2, case study 5. At audit, the RTO agreed with the auditor's finding of plagiarism and immediately commenced implementing their plagiarism policy and procedure. During the audit, the RTO met with the students concerned and has commenced undertaking remedial action. The RTO provided a copy of a previous incidence where plagiarism had been detected and how the RTO had managed this issue (November 2017). As a consequence, the student concerned was required to re-sit the relevant assessment task.

The non-compliances found on the student files reviewed are examples of areas where inadequate assessment practice has been identified. The RTO is responsible for providing evidence that confirms the students were assessed as meeting all the requirements of the training products in which they were enrolled.

Analysis of additional evidence:

CHCDIV001 Work effectively with diverse people

CHCPAL001 Deliver care services using a palliative approach

The following additional evidence was provided:

- Report – response to ASQA audit report
- Letter to ASQA
- WISENET Email – invitation to redo assessment
- WISENET email notification example
- WISENET Email – invitation Plagiarism workshop
- Student attendance – reassessment session
- Photographs of reassessment session for CHCPAL001 (four photographs)
- Examples of marked reassessment for CHCPAL001 (for three learners)
- Photographs of reassessment session for CHCDIV001 (two photographs)

- Examples of marked reassessment for CHCDIV001 (for two learners)
- Student assessment book for CHCHDIV001 - revised
- Assessor marking guide for CHCDIV001- revised
- Continuous Improvement Form – amendment to marking guide for CHCDIV001
- Professional Development Attendance Sheet – trainers and assessors
- Professional Development Calendar – updated
- Minutes of Trainer/Assessor meeting – 31 July 2018
- Student support services events calendar
- Student assessment book for CHCPAL001 – revised
- Assessor marking guide for CHCPAL001 – revised
- Continuous improvement form – amendment to student assessment book and marking guide for CHCPAL001
- Three point check assessment check template
- Continuous Improvement Form – amendment to three point check assessment check template
- Continuous Improvement of Assessment Policy and Procedure
- Validation of Assessment Policy and Procedure
- Assessment mapping document for CHCPAL001 – revised
- Continuous improvement form – amendment to assessment mapping document for CHCPAL001
- Conduct Effective Assessment Policy and Procedure
- Assessment Rules Policy and Procedure
- LCA17-0094 intervention interview and strategy form
- LCA17-0094 anecdotal notes
- LCA17-0099 anecdotal notes
- LCA17-0099 intervention interview and strategy form
- Evidence of marked reassessments for CHCDIV001 for the above two learners
- Student attendance – plagiarism workshop
- Session plan - plagiarism workshop
- PowerPoint slides from plagiarism workshop
- Paraphrasing activity from plagiarism workshop
- Plagiarism quiz from plagiarism workshop
- Plagiarism flyer
- Photographs of plagiarism posters around the RTO (six photographs)
- Reports of plagiarism workshops on 2 and 7/8 August 2018
- Attendance sheet for staff plagiarism workshop on 9 August
- Report for staff plagiarism workshop on 9 August
- Plagiarism Process – prevention, detection and actions

The evidence provided demonstrates that the RTO is compliant with Clause 1.8.