

VRQA2019-088
RTO 3969
Application Number: 16224
Ref: 96/00995

Ms Janet Claringbold
Manager
Mountain District Women's Co-operative Ltd
13-15 The Avenue
FERNTREE GULLY VIC 3156

Dear Ms Claringbold

Re: Rectification Matters and Renewal of Registration: Granted

Thank you for your response regarding the rectification of non-compliance matters identified at the audit held on 26 and 27 November 2018.

The Victorian Registration and Qualifications Authority (VRQA) is now satisfied that your organisation, Mountain District Women's Co-operative Ltd, has taken the appropriate measures to meet the minimum requirements for compliance with the *Australian Quality Training Framework Essential Conditions and Standards for Continuing Registration* and the *VRQA Guidelines for VET Providers*.

The VRQA is also satisfied that your organisation meets the financial viability and principal purpose requirements in compliance with the *Education and Training Reform Act 2006*. A copy of the Financial Viability Report dated 22 February 2019 is attached.

Given your satisfactory and comprehensive response, I have renewed the registration of Mountain District Women's Co-operative Ltd for a period of five years to 31 May 2024.

If you have any further questions in relation to this application, please email gar@edumail.vic.gov.au.

Yours sincerely



Danny Garcia
A/Manager, VET & Industry Engagement

15 / 4 / 2019

Mountain District Learning Centre - RTO 3969

Registration Audit Date: 26 & 27/11/2018

Summary of Significant and/or Critical Non-Compliances

Qualifications Assessed: 22236VIC Certificate I in General Education for Adults.

CPCWHS001 Prepare to work safely in the construction industry.

STANDARD 1.1 – The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment				
Standard No.	Finding	Required Rectification(s)	MDLC Action	Completion Date
1.1.1	The RTO does not collect, analyse and act on feedback from students for continuous improvement of training and assessment: No internal student surveys have been conducted for students in either course audited.	The RTO must ensure it collects analyses and acts on relevant data for continuous improvement of training and assessment.	The RTO will survey their students on a 6 monthly basis. The RTO & Vet Coordinator will be responsible for distribution and collection of surveys. Centre Manager to collate of the survey data.	Student surveys circulated 27/11/2018 Summary of student surveys 10/1/2019 Student feedback was gained from the 27/11/2018-6/12/2018 (see summary sheet)

STANDARD 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.				
Standard No.	Finding	Required Rectification(s)	MDLC Action	Completion Date
1.2.1	It is not clear that all documents comprising the Training and Assessment Strategy for 22236VIC Certificate I in General Education for Adults are current:	The RTO must ensure that the documents which comprise its Training and Assessment Strategies are current.	The RTO will include a review table at the top of each TAS. Information including: <ul style="list-style-type: none">• Date approved by board	July 2018

	<ul style="list-style-type: none"> • The Assessment validation documents /checklist for 8 x units from 22236VIC Certificate I in General Education for Adults have no date on them to indicate when the validation took place. 		<ul style="list-style-type: none"> • Scheduled review date • Responsible person/s for review <p>The validation Checklists were updated in July 2018 when it was noticed that a section for the date was missing. The validation documents audited were pre July 2018.</p>	
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STANDARD 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.**

Standard No.	Finding	Required Rectification(s)	MDLC Action	Completion Date
1.4.1	There is insufficient evidence that the two trainers have continued to develop their Vocational Education and Training (VET) knowledge and skills and trainer/assessor competence.	The RTO must ensure its trainers continue to develop their Vocational Education and Training (VET) knowledge and skills and trainer/assessor competence.	Update Trainer Profile and PD Register to include owner of business which will demonstrate vocational currency. Professional Development to be sourced to raise level of VET currency	Link to subscribe to VRQA e-news sent 9/1/2019. Ongoing VET Currency PD to be sourced.
1.4.2	There is insufficient evidence that the trainer for 22236VIC Certificate I in General Education for Adults has continued to develop her skills and knowledge directly relevant to the training/assessment being undertaken – in this	The RTO must ensure its trainers continue to develop their skills and knowledge directly relevant to the training/assessment being	Opportunities for professional development to ensure currency of adult literacy and numeracy. Seek membership from VALBEC	Link to ALA shared 19/12/2018 https://www.lincommunity.com.au/resources/ Australian Journal of

	case, adult literacy and numeracy.	undertaken.	and other related associations	Adult Learning, Vol 58, 3, November 2018 forwarded 14/12/2018 https://pmc.gov.au/domestic-policy/vet-review forwarded 18/12/2018 VOCEDplusNews@ncver.edu.au link shared 18/12/2018
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STANDARD 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 No.	Finding	Required Rectification(s)	MDLC Action	Completion Date
1.5.1	CPCCWHS1001 Prepare to work safely in the construction industry The assessment does not comply with the assessment requirements of the unit of competency. • Students are not required to demonstrate fitting a high visibility retro reflective vest as required in the unit of competency.	The RTO must ensure all assessment tools comply with the assessment requirements of the unit of competency.	Addition to assessment task to include demonstration of fitting a high visibility retro reflective vest.	28/11/2018
			Validate the unit and make changes as per recommendations and audit outcomes.	Validation Date 7/02/2019
1.5.2	CPCCWHS1001 Prepare to work safely in the construction industry. The assessment tools have not been implemented in a way that shows an appropriate assessment decision-making process. The assessor judgement is not	The RTO must ensure that assessment tools are implemented reliably and that assessment outcomes are recorded and reported reliably.	Make changes to assessment tools as outlined in audit report. Validate assessment tools to ensure a reliable judgement can	Changes to assessment tools completed 16/1/2019 Validation of

	<p>reliable and assessment outcomes are not recorded and reported reliably.</p> <ul style="list-style-type: none"> • In the four student files viewed, no multiple-choice assessments showed any evidence of trainer correction (ticks, crosses or similar). • In one file, two multiple-choice questions had a pencil circle and a pen circle on two different options. There was no indication of which answer was correct or why two different writing instruments were used by the student. • In one file, Activity 5, Section B of the Incident report form was not completed but the task was marked satisfactory. The Assessor Guide for Activity 5 says: "All sections of the Incident report form must be completed correctly." • In one file, the student did not answer multiple-choice Q19 but was marked satisfactory. The Assessor Guide says students must get all 60 questions correct. • In Assessment Activity 1, two students gave an answer which was not one of the four possible suggested satisfactory responses in the marking guide, but the answers were marked correct. • In one file, two pages of notes handwritten by the student on a sheet of paper with no headings were included. It was not clear why they were included in the file or whether they were used to contribute to the assessment outcome. 		<p>be made.</p> <p>Deliver training to ensure outcomes are recorded correctly and reported reliably.</p>	<p>CPCCWHS1001 scheduled for 7/02/2019</p> <p>Training Sessions scheduled for 7/02/2019</p>
1.5.3	<p>CPCCWHS1001 Prepare to work safely in the construction industry Learners are not clearly and accurately informed about the assessment process and requirements.</p> <ul style="list-style-type: none"> • The numbering and titling of tasks is not 	<p>The RTO must ensure learners are clearly and accurately informed about the assessment process.</p>	<p>Validate the unit and make changes as per recommendations and audit outcomes.</p>	<p>Date 7/02/2019</p>

	consistent across relevant assessment documents, so it is unclear to students.			
1.5.4	<p>CPCCWHS1001 Prepare to work safely in the construction industry When learners were assisted to demonstrate the skills and knowledge described in the unit, in the context of being fair and flexible, the nature of the assistance was not detailed so it was not clear whether it affected the validity and authenticity of the evidence produced.</p> <ul style="list-style-type: none"> • One file contained the comment on the Outcomes Record sheet: "At times needed guidance and responses ok." It is unclear how much assistance was given to the student or how the correct multiple-choice answers were selected at first attempt. • At interview, the trainer stated that he had assisted some students verbally to produce correct answers and that sometimes he accepted oral answers, particularly in the multiple-choice questions. This is not identified in the outcomes records or on the assessment tasks. 	The RTO must ensure that when learners are assisted to demonstrate the skills and knowledge described in the unit, in the context of being fair and flexible, the nature of the assistance is detailed so it is clear that it does not affect the validity and authenticity of the evidence produced.	Validate the unit and make changes as per audit recommendations. Conduct training to ensure reasonable adjustment is clear, fair and flexible and that any reasonable adjustment applied is documented in the assessor feedback section on completion of the assessment task(s).	Date 7/02/2019
1.5.5	<p>22236VIC Certificate I in General Education for Adults</p> <p>The assessment tools lack clear decision-making rules based on the unit requirements so assessment judgements are not reliable or valid:</p> <ul style="list-style-type: none"> • For each unit, the Assessor Guide and the Student assessment tasks state as the assessment benchmark: "Students are to address all criteria correctly to be deemed satisfactory in these assessment tasks." These criteria are not clearly specified for each task. 	The RTO must ensure that all assessment tools have clear decision-making rules based on the unit requirements so that assessment judgements are reliable and valid.	Unit updated in line with recommendations.	Completed 18/12/2018 Evidence: VU21332 Create texts of limited complexity to participate in the community – Assessor Guide and Student Assessment.

<ul style="list-style-type: none"> • For the unit VU21332 Create texts of limited complexity to participate in the community, the Assessor Guide and the Student assessment tasks do not include some of the criteria stated in the unit, for example: <ul style="list-style-type: none"> – “3.1 Select and use appropriate features to express precise meaning”, referring to the Range Statement for extensive detail on those text features – “Required Knowledge – basic structural conventions of text, including chronological sequencing of events, identification followed by description, consistent use of grammatically correct simple sentence forms, occasional use of complex sentences and use of upper- and lower-case letters”. • The unit VU21332 Create texts of limited complexity to participate in the community references the Australian Core Skills Framework: “The required outcomes described in this unit relate directly to the Australian Core Skills Framework (ACSF). They contribute to the achievement of ACSF indicators of competence at Level Three (Writing): 3.05, 3.06”. However, the Assessor Guide for this unit does not reference the ACSF Level Three (Writing) indicators of competence. • The text created by one student who was assessed as competent in the unit VU21332 demonstrated language indicators at ACSF Level 2. • The Assessor Guide for Task 4 Practical demonstration states: “On at least two different occasions your Assessor will watch you as you read, interpret/make meaning of the texts...” 			
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	Your Assessor will compare your actions against specific criteria and complete an observation checklist. Assessors should ensure they observe students demonstrating the skills expected below.” The Assessor Guide Checklist largely draws on the Range Statement in the unit and does not provide the trainer with a set of observable actions as criteria.			
1.5.6	<p>22236VIC Certificate I in General Education for Adults</p> <p>The assessment tools have not been implemented in a way that shows an appropriate assessment decision-making process. The assessment judgement is not reliable.</p> <ul style="list-style-type: none"> • For Observation Checklist Task 2 in the clustered assessment containing VU21332 Create texts of limited complexity to participate in the community, the trainer asks students questions about texts. The Assessor Instructions state: “Record examples of the specific evidence which reflects the recorded outcome.” The trainer has simply written ‘Yes, task completed’ rather than recording the student’s actual responses. 	The RTO must ensure that assessment tools are implemented reliably and that assessment outcomes are recorded and reported reliably.	Deliver training to ensure that assessment outcomes are recorded and reported reliably. This will include the expectation of recording the students’ actual responses rather than noting completion of the task.	Date 7/02/2019
1.5.7	<p>22236VIC Certificate I in General Education for Adults</p> <p>The assessment process is not fair or flexible in relation to some students.</p> <ul style="list-style-type: none"> • Two students had very poor handwriting and their handwritten texts and short answers were at ACSF Level 1–2. However, their computer-produced writing was much more fluent and showed a much bigger vocabulary and more 	The RTO must ensure that the assessment process is implemented in a way that is fair and flexible to meet the needs of individual students.	Implement changes as per audit recommendations in regards to the assessment process by advising trainers and documenting expectations to ensure reasonable adjustment is clear, fair and flexible to meet the needs of individual students	Completed 18/12/2018 Evidence: VU21332 Create texts of limited complexity to participate in the community – Assessor Guide and Student Assessment.

	complex sentence structures. They were sometimes not enabled to submit computer-produced answers and texts.		including the use of computer produces answers and texts for students who may have poor handwriting.	
1.5.8	<p>22236VIC Certificate I in General Education for Adults</p> <p>Students are not provided with constructive feedback.</p> <ul style="list-style-type: none"> • For one student who was assessed as NYC on a unit, the written feedback did not state the reason for the outcome or give advice on what the student could do to improve in order to resubmit at a later date. 	The RTO must ensure that students are provided with constructive feedback.	Trainers have been instructed on providing constructive feedback, giving reasons for the outcomes provided and on giving advice on what the student could do to improve when required to resubmit at a later date.	Compliance Training Session for Teaching Staff 29/1/2019 Evidence: Meeting notes
1.5.9	<p>22236VIC Certificate I in General Education for Adults</p> <p>Learners are not clearly and accurately informed about the assessment process and requirements.</p> <ul style="list-style-type: none"> • The language and design of assessment materials provided to students should be adapted to match the capabilities of the target cohort. Often the same language and design is used for both the Assessor Guide and the Student Assessment Tasks and is pitched at the assessor audience. • One task is called both 'Practical demonstration' and 'Observation' on different documents. Task titles and numbers needs to be consistent for student clarity. 	The RTO must ensure that learners are clearly and accurately informed about the assessment process and requirements.	Refine the VET language used in student assessments to meet the target cohort. Ensure consistency of assessment method used * see dot point 2 for example.	18/12/2018

VRQA2019-001
RTO 3969
Application Number: 16224
File:96/00995

Ms Janet Claringbold
Manager
Mountain District Women's Co-operative Ltd
13-15 The Avenue
FERNTREE GULLY VIC 3156

Dear Ms Claringbold

Renewal of Registration Application: Rectification Requirements

I am writing to you as a Registered Training Organisation (RTO) pursuant to Part 4.3 of the *Education and Training Reform Act 2006* (ETR Act) in relation to the application for renewal of registration of Mountain District Women's Co-operative Ltd trading as Mountain District Learning Centre (MDLC).

It is a condition of registration as an RTO that you comply with the minimum conditions and standards and any guidelines for registration including the *Australian Quality Training Framework Essential Conditions and Standards for Continuing Registration* (AQTF) and the *VRQA Guidelines for VET Providers* (VRQA Guidelines).

An independent audit on 26 and 27 November 2018 assessed the compliance of MDLC against these standards for the purpose of renewal of registration. I note that you accepted the findings of the audit report and that you have provided comments on the draft audit report which was provided by the auditor.

I now enclose the final audit report for your attention which indicates critical non-compliance with the AQTF at standard 1.5 and significant non-compliance at standards 1.1 to 1.4. Given the non-compliance, MDLC is required under Part 4.3.17 of the ETR Act to submit by 15 February 2019 documented evidence of how the non-compliances identified in the audit report have been rectified.

Please forward the evidence to VET Quality Assurance, VRQA, GPO Box 2317, Melbourne, 3001 or email it to quality_assurance_review@edumail.vic.gov.au.

The re-registration of MDLC will be considered after the evidence has been assessed and the delegate is satisfied that all non-compliances have been rectified including any issues arising from the financial viability audit (FVA). The FVA is still in progress and the VRQA will write to you should any rectification from the FVA be required.

Should you have concerns about the conduct of the registration/audit process please address these in writing to the Manager Complaints and Student Services, VRQA, GPO Box 2317, Melbourne, 3001.

If you have any further questions in relation to this application, please email qar@edumail.vic.gov.au

Yours sincerely



Simon Thorn
Executive Manager, Skills and Training

4/1/2019