



Australian Government
Australian Skills Quality Authority

2 September 2019

Mr Matthew Phillips
Chief Executive Officer
Stanborough Wemyss Contracting Pty Ltd
Level 5, East Tower, 608 St Kilda Rd
MELBOURNE VIC 3004

By email to: mattp@swc.com.au

RTO ID: 4567
Evidence Review No: AUDREC0008714

Dear Mr Phillips

Re: Notice of decision not to proceed with sanction

This letter is written notice that the Australian Skills Quality Authority (ASQA), as the national VET regulator (NVR), has considered your organisation's recent written response to ASQA's Notice of Intention to make a decision to impose sanction(s), in accordance with the natural justice requirements of section 37(1) of the *National Vocational Education and Training Regulator Act 2011*.

Following careful consideration of the information provided in your response, I advise that ASQA will not be proceeding with the imposition of sanction outlined in our correspondence of 03/07/2019. The analysis of your response is attached.

If you require further information in relation to this matter, please contact ASQA's Infoline on 1300 701 801 or at enquiries@asqa.gov.au

Yours sincerely

Arvid Yaganegi
Manager Regulatory Operations

Australian Skills
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Evidence analysis

ORGANISATION DETAILS

Organisation's legal name	Stanborough Wemyss Contracting Pty Ltd
Trading name/s	Stanborough Wemyss Contracting Pty Ltd and SWC Training
RTO number (if applicable)	4567
CRICOS number (if applicable)	N/A

REVIEW DETAILS

Type of review	Sanction
Evidence review number	EVRREC00002641
Date evidence received	29/07/2019
Date review conducted	5/08/2019

REVIEW TEAM

Reconsideration officer	Arvid Yaganegi
Review officer	Simon Cochaud
Technical adviser/s	N/A

SCOPE OF REVIEW

Code	Training Product	Mode/s of delivery/assessment*
HLT37115	Certificate III in Hospital/Health Services Pharmacy Support	Traineeship/Workplace
HLT47115	Certificate IV in Hospital/Health Services Pharmacy Support	Traineeship/Workplace
HLT47515	Certificate IV in Operating Theatre Technical Support	Traineeship/Workplace

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

FINDING FOLLOWING EVIDENCE REVIEW

Finding as at 5/08/2019: Concerning non-compliance

- If non-compliance has been identified, this analysis describes evidence of the non-compliance.

Clause 1.1	The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.
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Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.1 the training and assessment strategy for example **but not limited to**; does not distinguish the different learner cohorts' specific industry experience. Mapping matrix and delivery schedule presented are generic samples and does not align with each different learner cohort. The training and assessment strategy does not specify how non-accredited and/or in-house training is mapped to each unit of competency. The training and assessment practice is different to the documented training and assessment strategy and student assessments.

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted).
- **Analysis of evidence:**
 - Analysis of the Rectification and Action Plan outlines demonstrates that the organisation has:
 - reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - has implemented a Rectification and Action Plan to review 1 qualification every two weeks.
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.2	<p>For the purpose of the clauses 1.1, the RTO determines the amount of training they provide to each learner with regard to:</p> <ol style="list-style-type: none"> a) the existing skills, knowledge and the experience of the learner b) the mode of delivery c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.
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Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.2, the training and assessment strategy for example; **but not limited to**, does not distinguish the different learner cohorts' existing skills, knowledge and the experience of the learner non-accredited and/or in-house training.

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan

- updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted).
- **Analysis of evidence:**
 - Analysis of the Rectification and Action Plan outlines demonstrates that the organisation has:
 - reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - implemented a Rectification and Action Plan to review 1 qualification every two weeks.
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.3

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.3 the trainers and assessors for example **but not limited to**; have not undertaken professional development activities since July 2015, resumes refer to last date as July 2015 and commencing a qualification and no mapping of vocational currency to units of competency. Pharmacy trainer and assessor [REDACTED] registration with Pharmacy Board of Australia Certification of Registration for the period [REDACTED]

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated trainers and assessors resumes and qualifications
 - Updated trainers and assessors certifications and/or registrations
 - Industry currency and professional development logs for each of 4 trainers and assessors
 - Mapping matrix (mapping vocational experience to each unit of competency and each trainer).
- **Analysis of evidence:**
 - Analysis of the Rectification and Action Plan outlines demonstrates that the organisation has:
 - trainer and assessors that have submitted updated CV, including current registration of [REDACTED] Pharmacy Board registration
 - Industry currency and professional development logs for four trainers updated and current, with a remaining trainers and assessors to be complete every two weeks until completion.
 - Revised mapping matrix submitted demonstrates trainers and assessors for qualifications HLT47115, HLT47115 and HLT47515 have industry currency and professional currency mapped to each unit of competency. Organisation scheduled to complete remaining units of competency by 31 January 2020
 - Revised and updated mapping documents align with the trainer and assessor resources and the unit of competency requirements including assessment requirements.

- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.4 The RTO meets all requirements specified in the relevant training package or VET accredited course.

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.4 meets all requirements specified in the relevant training package or VET accredited course, for example **but not limited to**; students have not been sufficiently assessed against HLTPHA008, student assessment task identified 17 of 20 questions do not align with mapping document and the assessment requirements for HLTPHA008.

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted)
 - Revised assessment resources reviewed and resubmitted for HLTPHA008, HLTPHA009, HLTTHE001 and HLTTHE003
 - SWC has established an independent assessment and review panel for each unit (including an external independent industry expert).
- **Analysis of evidence:**
 - Analysis of the Rectification and Action Plan outlines demonstrates that the organisation has:
 - organisation has reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - revised assessment resources submitted meet the units of each unit of competency assessment requirements and specifically the organisation has contacted previous students identified who will require skills gap training to ensure students are compliant units of competency HLTPHA008, HLTPHA009, HLTTHE001 and HLTTHE003
 - organisation has advised current students enrolled in the above units of competency will be trained and assessed under the new training and assessment resources developed for these units of competency
 - revised and updated mapping documents align with the trainer and assessor resources and the unit of competency requirements including assessment requirements.
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.8 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
- 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.

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.8 with demonstrated evidence of implements an assessment system that ensures that assessment (including recognition of prior learning): **but not limited to**; students have not been sufficiently assessed against HLTPHA008, student assessment task identified 17 of 20 questions does not align with mapping document and the assessment requirements for HLTPHA008. Students files supplied does not demonstrate students are competent in this unit of competency. Provider is not able to demonstrate Principles of Assessment and Rules of Evidence and complies with the assessment requirements of HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support and HLT47515 Certificate IV in Operating Theatre Technical Support.

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted)
 - Redeveloped trainer and assessment resources for units HLTPHA008, HLTPHA009, HLTTHE001 and HLTTHE003
 - SWC has established an independent assessment and review panel for each unit (including an external independent industry expert)
 - Reassessment plan and skills gap training for students enrolled in qualifications HLT47115 and HLT47515.
- **Analysis of evidence:**
 - Rectification and Action Plan outlines specifically the following in relation to Clause 1.8
 - Organisation has reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - Revised assessment resources submitted meet the units of each unit of competency assessment requirements and specifically the organisation has contacted previous students identified who will require skills gap training to ensure students are compliant units of competency HLTPHA008, HLTPHA009, HLTTHE001 and HLTTHE003
 - Organisation has advised current students enrolled in the above units of competency will be trained and assessed under the new training and assessment resources developed for units of competency HLTPHA008, HLTPHA009, HLTTHE001 and HLTTHE003
 - Revised and updated mapping documents align with the trainer and assessor resources and the unit of competency requirements including assessment requirements.
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.9

The RTO implements a plan for ongoing systematic validation of assessment practices and judgements that includes for each training product on the RTO's scope of registration:

- a) when assessment validation will occur
- b) which training products will be the focus of validation
- c) who will lead and participate in validation activities
- d) how the outcomes of these activities will be documented and acted upon.

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.9 for example **but not limited to**; provider has not submitted a validation schedule or demonstrating each training product is validated at least once every five years, with at least 50 per cent of products validated within the first three years of each five year cycle.

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted)
 - 5 year validation plan, organisations revised procedures for Clauses 1.9 to 1.11 and revised Validation Checklist template.
- **Analysis of evidence:**
 - Rectification and Action Plan outlines specifically the following in relation to Clause 1.9
 - Organisation has reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - Organisation 5 year validation plan identifies units of competency previously validated and specifies remaining units of competency scheduled by month and year
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 1.13

In addition to the requirements specified in clause 1.14 and clause 1.15, the RTO's training and assessment is delivered only by persons who have:

- vocational competencies at least to the level being delivered and assessed
- current industry skills directly relevant to the training and assessment being provided
- current knowledge and skills in vocational training and learning that informs their training and assessment.

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 1.13 the trainers and assessors for example **but not limited to**; have not undertaken professional development activities since July 2015, resumes refer to last date as July 2015 and commencing a qualification and no mapping of vocational currency to units of competency. Pharmacy trainer and assessor [REDACTED] registration with Pharmacy Board of Australia Certification of Registration for the period [REDACTED]

Analysis of evidence

- **Evidence provided:**
 - Rectification and Action Plan
 - Updated trainers and assessors resumes and qualifications
 - Updated trainers and assessors certifications and/or registrations
 - Industry currency and professional development logs for each of 4 trainers and assessors
 - Mapping matrix (mapping vocational experience to each unit of competency and each trainer).
- **Analysis of evidence:**

- Rectification and Action Plan outlines specifically the following in relation to Clause 1.13
 - Organisation trainer and assessors have submitted updated CVs, including current registration of [REDACTED] Pharmacy Board registration
 - Industry currency and professional development logs for four trainers updated and current, with a remaining trainers and assessors to be complete every two weeks until completion .
 - Revised mapping matrix submitted demonstrates trainers and assessors for qualifications HLT47115, HLT47115 and HLT47515 have industry currency and professional currency mapped to each unit of competency. Organisation scheduled to complete remaining units of competency by 31 January 2020
 - Revised and updated mapping documents align with the trainer and assessor resources and the unit of competency requirements including assessment requirements.
- The organisation has provided evidence to demonstrate compliance with this clause.

Clause 2.2

The RTO:

- a) systematically monitors the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1
- b) systematically evaluates and uses the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices. Evaluation information includes but is not limited to quality/performance indicator data collected under clause 7.5, validation outcomes, client trainer and assessor feedback and complaints and appeals.

Finding: Compliant

Outstanding non-compliance

- Provider response does not demonstrate compliance with Clause 2.2 for example **but not limited to**; a systematically monitoring there training and assessment strategies and identification of poor assessment practice and inaccurate assessments and implementation of sufficient training and assessment strategies and practices to ensure ongoing compliance.

Analysis of evidence

• Evidence provided:

- Rectification and Action Plan
- Updated Training and Assessment Strategy for HLT47115 Certificate IV in Hospital/Health Services Pharmacy Support, HLT47515 Certificate IV in Operating Theatre Technical Support and HLT37115 Certificate III in Hospital/Health Services Pharmacy Support (specific training and assessment strategy for each different cohort, total of 10 submitted)
- SWC has established an independent assessment and review panel for each unit (including an external independent industry expert)
- Reassessment plan and skills gap training for students in HLT47115 and HLT47515
- 5 year validation plan, organisations revised procedures for Clauses 1.9 to 1.11 and revised Validation Checklist template.

• Analysis of evidence:

- Rectification and Action Plan outlines specifically the following in relation to Clause 2.2
 - Organisation has reviewed and resubmitted TAS for different cohorts and for different worksite requirements (total of 10 TAS reviewed)
 - Organisation has demonstrated a commitment to training and assessment practice and continuous improvement by establishing an independent assessment and review panel for each unit of competency, (including an external independent industry expert)



- Organisation has advised current students enrolled in the above units of competency will be trained and assessed under the new training and assessment resources developed for these units of competency
 - Revised and updated mapping documents align with the trainer and assessor resources and the unit of competency requirements including assessment requirements
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- The organisation has provided evidence to demonstrate compliance with this clause.
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