



VRQA2018-101
RTO 5527
Application Number: 15758
Ref: 98/01649

Mr Justin Gathercole
Director
First Knight Investments Pty Ltd



Dear Mr Gathercole *Justin*

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 23 and 24 April 2018.

The Victorian Registration and Qualifications Authority (VRQA) is now satisfied that your organisation, First Knight Investments Pty 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 requirements in compliance with the *Education and Training Reform Act 2006*. A copy of the Financial Viability Report dated 27 April 2018 is attached.

Based on your satisfactory response and that First Knight Investments Pty Ltd has entered into an Enforceable Undertaking in regard to the Principal Purpose Requirement exemption, the VRQA is pleased to renew the registration of First Knight Investments Pty Ltd for a period of five years to 31 July 2023.

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

Yours sincerely

Christine Croker
A/Manager, Quality Assurance, VET

26/7...../2018



ENFORCEABLE UNDERTAKING
Education and Training Reform Act 2006 (ETR Act)

CONFIDENTIAL

THIS UNDERTAKING IS GIVEN BY:
FIRST KNIGHT INVESTMENTS PTY LTD
ABN 51 082 405 776



AND IS ACCEPTED BY:
Lynn Glover, CEO (Director) of the
Victorian Registration and Qualifications Authority (VRQA)
Level 4, 2 Lonsdale Street
MELBOURNE VIC 3000

Under Section 5.8.3V of the *ETR Act*.

Authority

1. Pursuant to the functions and powers vested under Part 4.3 of the *Education and Training Reform Act 2006* (ETR Act) the Victorian Registration and Qualifications Authority (VRQA) has the power to register, and renew the registration of, a Registered Training Organisation (RTO) and the power to conduct compliance audits. An RTO is subject to conditions including the requirement to provide information about any of its operations reasonably required by the VRQA.
2. Under Section 5.8.3V the VRQA may accept a written undertaking given by an RTO in connection with any matter in relation to which the VRQA has a power or function under the ETR Act and any matter relating to a contravention of a relevant law.

Acknowledgments - operation of enforceable undertaking

3. In giving this undertaking, First Knight Investments Pty Ltd (First Knight) acknowledges that a failure to comply with any conditions of the undertaking may result in the VRQA applying for a court order under Section 5.8.3Y of the ETR Act.
4. First Knight acknowledges they have been provided with a copy of the VRQA Enforceable Undertaking Policy (dated August 2015).
5. First Knight acknowledges that it has had an opportunity to seek independent legal, commercial or financial advice as may be relevant.



Undertakings

6. First Knight undertakes that it will:

- a. only provide training to the employees of the following entities at no cost to the trainees:
 - Rich river Meat Exports Pty Ltd (Tatura)
 - Tatura Abattoirs Pty Ltd (Tatura)
 - Wangaratta Abattoirs Pty Ltd (Wangaratta)
 - Southern Select Beef Pty Ltd (Carrum)
 - Aus Offal Pty Ltd (Carrum)
- b. advise the VRQA of any change to any of the entities listed above
- c. provide a quarterly declaration to the VRQA to confirm the matters above, in September and December 2018; March and June 2019; and pending satisfactory evidence of this quarterly reporting, declarations to be provided annually from June 2019.

Signed by:

First Knight Investments Pty Ltd

ABN 51 082 405 776

Justin Andrew Gathercole

CEO First Knight Investments Pty Ltd.

Date: 19/7 2018

Name of witness: *PETER SCHOON*

Signature: *Peter Schoon*

Date: 19 July 2018

Accepted by

LYNN GLOVER

CEO (Director), VRQA

Date: 25 July 2018



VRQA 2018-002

INSTRUMENT OF EXEMPTION FROM THE PRINCIPAL PURPOSE REQUIREMENT

1. Exemption

Subject to the following paragraphs, the organisation listed in paragraph 3 is hereby granted an exemption under section 4.3.16(4B)(c) of the *Education and Training Reform Act 2006* from the requirement to have the principal purpose of providing education and training.

2. Period of exemption and revocation.

The exemption:

- (a) commences on the date on which this instrument is signed; and
- (b) subject to subparagraph (c), expires on **30 July 2023** and
- (c) expires earlier than the date referred to in subparagraph (b) if prior to that date:
 - (i) the organisation ceases to be an RTO; or
 - (ii) the exemption is revoked under paragraph 5.

3. Organisation exempted

Details of organisation

- First Knight Investments Pty Ltd
- 51 082 405 776 (ABN)

4. Grounds of exemption

The exemption is granted on the grounds that the organisation:

- (a) ~~is a community based organisation;~~
- (b) ~~provides education and training services on a not for profit basis; or~~
- (c) provides education and training services only to staff members or staff members of related entities.

5. Earlier revocation

This exemption may be revoked if:

- (a) in the delegate's sole discretion, the organisation ceases to satisfy the grounds listed in paragraph 4; or
- (b) there is a significant change in the facts, circumstances or information which were provided in support of the application for exemption, and in the delegate's sole discretion, those changes no longer justify this exemption continuing.

6. Definitions

In this instrument:

- (a) **the exemption** means the exemption referred to in paragraph 1;
- (b) **the organisation** means the organisation listed in paragraph 3;
- (c) **the delegate** means a person or office holder delegated by the Minister to exercise the powers under section 4.3.16(4B) of the *Education and Training Reform Act 2006*.



Lynn Glover

**Chief Executive Officer/Director Victorian Registration and Qualifications Authority
Delegate of the Minister for Higher Education and Skills**



Note: The organisation must inform the Director, Victorian Registration and Qualifications Authority, in writing:

- (a) if the grounds listed in paragraph 4 no longer apply to the organisation; or
- (b) if there is a change in the facts, circumstances or information which were provided in support of the application for exemption.

The Director must be informed as soon as possible of the relevant changes, and in any event no later than 30 days from the date on which those changes occur.



Victorian Registration &
Qualifications Authority

GPO Box 2317
Melbourne VIC 3001
T (03) 9637 2808
vrqa@edumail.vic.gov.au
www.vrqa.vic.gov.au

VRQA2018-075
RTO 5527
Application Number: 15758
Ref: 98/01649

Mr Justin Gathercole
Director
First Knight Investments Pty Ltd

Dear Mr Gathercole

Renewal of Registration Application: Rectification Requirements

I am writing in relation to the audit conducted following the application for renewal of registration of First Knight Investments Pty Ltd (First Knight) as a Registered Training Organisation (RTO) pursuant to Part 4.3 of the *Education and Training Reform Act 2006* (ETR Act).

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 23 and 24 April 2018 assessed the compliance of First Knight 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 some rectifications and comments on the draft audit report which was provided by the auditor.

I now enclose the final audit report for your attention which indicates significant non-compliance with the AQTF at Standard 1.5 and non-compliance with elements of the VRQA Guidelines. First Knight is required under Part 4.3.17 of the *Education and Training Reform Act 2006* to provide within 28 days of the date of this letter, documented evidence of how the non-compliances have been rectified.

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

Re-registration will be considered after the evidence has been assessed and the delegate is satisfied that First Knight is compliant.

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

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

Yours sincerely



Christine Croker
A/Manager, Quality Assurance, VET

.....24/5...../2018

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

Applicant Details			
Applicant Name	First Knight Investments Pty Ltd	TOID	5527
Address	[REDACTED]		
	Website	http://www.firstknight.com.au/	
Registration Contact	Justin Gathercole (Director)		
Phone Number	9772 7011	Email	justin@gathercole.com.au
Audit Team			
Audit Firm	Quorum QA Australia Pty Ltd	Auditor/s	Andrea Bateman
Auditor/s	Carol Macreadie	Other Attendees	
Registering Body Details			
Contact Person	Julie Florence		
Phone Number	9032 1560	Email	vet.audit@edumail.vic.gov.au
Audit Details			
Type of Audit	Re-registration Audit		
Conditions Audited	3, 6, 7, 8, 9		
Standards Audited	1.1, 1.2, 1.3, 1.4, 1.5	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	3.1, 3.2, 3.3 , 3.4
2016 VRQA Guidelines Audited	4.3	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7, 2.8 (If applicable)	
	3.1, 3.2, 3.3 , 3.4, 3.5	4.1, 4.2, 4.3 to 4.6 (If applicable)	
Audit Date/s	23 & 24 April 2018		
RTO Background			
<p>The organisation is an enterprise RTO, owned by Gathercole, a meat industry enterprise. The RTO provides training and assessment services to workers at Gathercole sites – Tatura, Carrum, Wangaratta. The organisational structure includes a director and a training manager.</p> <p>The RTO has entered into a service agreement with Food Business Solutions Pty Ltd. Food Business Solutions Pty Ltd provides administration support and quality assurance support for the company, including development of training and assessment materials. Food Business Solutions charges for the services provided. Food Business Solutions is managed by Mr John Price, and is listed as the Training Administrator for First Knight. Mr Stephen Craig also works for Food Business Solutions and is listed as the Quality Administrator for First Knight. The trainer is employed directly by First Knight.</p> <p><u>Number of students: 42 active.</u></p>			

AQTF Essential Conditions and Standards for Continuing Registration & VRQA Guidelines for VET Providers - Audit Report

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

Qualifications/Units Audited ¹		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
AMP30616	Certificate III in Meat Processing (General)	Tatura, Wangaratta, Carrum
AMP40315	Certificate IV in Meat Processing (Leadership)	Not yet delivered

Interviewee(s) – Staff name and position; employer name and position	
Justin Gathercole	Director (via teleconference)
Stephen Craig	Quality Administrator
John Price	Training Administrator

Permanent Delivery Sites –	Yes	No
Do the RTO's permanent delivery sites match the information provided by the VRQA?		X
If 'No', please provide amended details below: Training is delivered at Gathercole meat processing sites – Tatura, Wangaratta and Carrum.		

Third party Arrangements –	Yes	No
Do the RTO's third-party arrangements match the information provided by the VRQA?		X
If 'No', please provide amended details below: The RTO has entered into a service agreement with Food Business Solutions Pty Ltd to provide non-training and assessment support.		

¹ Samples have been selected in accordance with the VRQA VET Audit Sampling Methodology

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

Audit Summary - AQTF Conditions of Registration

AQTF Conditions		Compliant	Non - Compliant	Not audited
Place an X in the appropriate column				
1	Governance			X
2	Interactions with the Registering Body			X
3	Compliance with Legislation		X	
4	Insurance			X
5	Financial Management			X
6	Certification & Issuing of Qualifications & Statements of Attainment		X	
7	Recognition of Qualifications Issued by other RTOs		X	
8	Accuracy and Integrity of Marketing	X		
9	Transition to Training Packages/Expiry of Accredited Courses		X	
Summary of Non-Compliance²				
<p>CF 3.1 There is no information about trainer obligations regarding privacy and confidentiality in Staff Handbook.</p> <p>CF 6.1 Certificates issued include out-dated clause.</p> <p>CF 6.2 Documentation does not confirm that data records will be retained for a period of 30 years.</p> <p>CF 7.1 Student Induction Manual includes confusing information in relation to Credit Transfer and Recognition of Qualifications issued by RTOs.</p> <p>CF 7.2 Application for RPL forms does not accurately define Credit Transfer and National Recognition.</p> <p>CF 9.1 Transitions processes do not include critical steps that need to be undertaken.</p>				
Strengths				
There is a well-documented quality management system.				

² CF = Condition Finding. Finding references are aligned to the Detailed Findings section of this report.

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

Audit Summary - AQTF Standards

AQTF Standards/Elements	Compliant	Non - Compliant	Not audited
Standard 1			
1.1 – Continuous Improvement Strategy	X		
1.2 – Training and Assessment Strategies		X	
1.3 – Training and Assessment Resources		X	
1.4 – Trainer and Assessor Competency		X	
1.5 – Assessment Strategies		X	
Standard 2			
2.1 – Meeting the Needs of Clients		X	
2.2 – Continuous Improvement of Client Services	X		
2.3 – Provision of Information to Clients		X	
2.4 – Third-Party Engagement in Training and Assessment	X		
2.5 – Provision of Support Services to Clients		X	
2.6 – Learner Access to Records of Participation		X	
2.7 – Complaints and Appeals Strategy		X	
Standard 3		X	
3.1 – Operations Management		X	
3.2 – Continuous Improvement of Operations	X		
3.3 – Third-Party Training and/ or Assessment Services			X
3.4 – Records Management	X		
Summary of Non-Compliance³			
<p>SF.1.2.1 Training and assessment strategies inaccurately refer to formative assessment as being part of the summative assessment decision.</p> <p>SF.1.2.2 Training and assessment strategies indicate that there are 4 assessment methods used, including the decision of the supervisor, which is not consistent with assessment tools.</p> <p>SF 1.3.1 Refer to St 1.4 and 1.5.</p>			

³ SF = Standard Finding. Finding references are aligned to the Detailed Findings section of this report.

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

SF 1.4.1

The evidence provided did not confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.

SF1.5.1 and SF 1.5.2

For both qualifications the assessment tools reviewed for 4 units indicated that there were issues of validity and reliability.

SF 2.1.1

Client needs are identified but there is not sufficient or accurate information or evidence to show how they are met.

SF 2.3.1

Information in the Student Induction Manual does not accurately reflect the services provided by the RTO.

SF 2.5.1

Refer to findings for 2.1 and 2.3.

SF 2.6

The Student Induction Manual does not explicitly inform candidates of their rights to access their records.

SF 2.7

The complaints and appeals policy lack clarity and did not include key information as required.

SF 3.1

Students do not receive the support services as detailed in the Student Induction Guide.

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

Audit Summary – 2016 VRQA Guidelines for VET Providers

2016 VRQA Guidelines	Compliant	Non - Compliant	Not audited
1. Governance, Financial viability and Management systems			
1.1 – Strategic Plan and Business Plan			X
1.2 – Financial Viability			X
1.3 – Management Systems			X
1.4 – Governance			X
2. Transparency and oversight of third parties			
2.1 – Third party agreement		X	
2.2 – Co-operation with VRQA		X	
2.3 – Notifying VRQA of Third party agreements		X	
2.4 – Information - Disclosure of third party services		X	
2.5 – Pre-enrolment materials - Disclosure of third party services		X	
2.6 – Changes to third party services		X	
2.7 – Complaints - Third party services		X	
2.8 – Appeals - Third party services		X	
3. Trainer and assessor qualification (including individuals working under the supervision of a trainer)			
3.1 – Vocational & Industry skill requirements		X	
3.2 – Training and Assessment (TAE) skill requirements	X		
3.3 – Assessment only skill requirements			X
3.4 – Supervision arrangement requirements			X
3.5 – Trainer under supervision skill requirements			X
4. Delivery of training and assessment services			
4.1 – Training and assessment practices		X	
4.2 – Amount of training		X	
4.3 – TAE - Independent validation of assessment system, tools, processes and outcomes			X
4.4 – TAE – Trainer and Assessor skills (1 January 2016 to 31 December 2016)			X
4.5 – TAE – Trainer and Assessor skills (1 January 2017 onwards)			X
4.6 – TAE – Trainer under supervision requirements			X

Audit Date: 23–24 April 2018

RTO: First Knight Investments Pty Ltd

4.7 – TAE – Registration requirements			X
5. Annual Declaration of Compliance			
5.1 – Annual Declaration of Compliance			X

Summary of Non-Compliance⁴

GF.2.1.1

The third-party agreement does not clearly articulate the services as described at audit, **GF.1.3.2**

GF.2.2.1

The third-party agreement does not ensure that the third party is required to cooperate with the regulator.

GF 2.3.1

The third-party arrangement has not been made clear to the VRQA. There are no internal processes to ensure that these requirements will be met.

GF 2.4.1

The marketing materials do not specify an third party arrangements.

GF 2.5.1

The information provided to applicants does not specify any third party arrangements, nor the name and contact details of the third party.

GF 2.6.1

The agreement or similar quality assurance documentation does not address how students will be informed if there are changes to the agreement.

GF 2.7.1

The complaints and appeals policy not indicate how students can complain of any services provided by Food Business Solutions Pty Ltd.

GF 2.8.1

The complaints and appeals policy not indicate how students can appeal any services provided by Food Business Solutions Pty Ltd.

GF 3.1.1

The evidence provided did not confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.

GF 4.1.1 and 4.2.1

The strategies in relation to the amount of training does not provide a distinction between training/learning time and assessment time.

⁴ GF = Guideline Finding. Finding references are aligned to the Detailed Findings section of this report.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

Detailed Findings - AQTF Conditions of Registration

CONDITION 1 - Governance		Not audited in Phase 2 audit
CONDITION 2 - Interactions with the Registering Body		Not audited in Phase 2 audit
CONDITION 3 - Compliance with Legislation		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Staff Handbook • Student Induction Guide 		
CF.3.1	Finding	Required Rectification(s)
	No information about trainer obligations regarding privacy and confidentiality in Staff Handbook.	Include information about trainer obligations regarding privacy and confidentiality to Staff Handbook..
CONDITION 4 - Insurance		Not audited in Phase 2 audit
CONDITION 5 - Financial Management		Not audited in Phase 2 audit

CONDITION 6 - Certification & Issuing of Qualifications & Statements of Attainment		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • FKI ISSUING AQF Certification policy • FKI sample Certificate • FKI sample Statement of Attainment • PR6.05.19 Archiving and Destruction of Learner Files • PR6.05.43 VETtrak – Access and Use • VETtrak licence • 23/04/2018 Skills Victoria Training System log • Application Form • Formal Enrolment form • USI privacy notice • Student sample 		
CF.6.1	Finding	Required Rectification(s)
	Certificate uses outdated clause, e.g., currently states 'the qualification certified herein...' rather than the clause required by the AQF: 'The qualification is recognised within the Australian Qualifications Framework'	The RTO is to make adjustment to the Certificate sample and for those issued, to include the most current clause required by the AQF.
CF.6.2.	Finding	Required Rectification(s)
	Documentation does not confirm that data records will be retained for a period of 30 years.	The RTO needs to demonstrate that its processes ensure that client records of attainment of units of

	competency and qualifications are retained for a period of 30 years, i.e. that within VETTRAK.
--	--

CONDITION 7 - Recognition of Qualifications Issued by other RTOs		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Application for RPL form • Student Induction Manual • Interview with Training Administrator 		
CF.7.1	Finding	Required Rectification(s)
	Student Induction Manual refers to: RPL, Credit Transfer, RCC and Recognition of Qualifications issued by RTOs. Although the information in relation to Recognition of Qualifications is correct, the difference (if there is one) between this and Credit Transfer is not made clear.	Review and revise the Student Induction Manual and the application form to ensure that it is clear what is required for candidates to provide evidence for recognition of Qualifications issued by other RTOs.
CF.7.2.	Finding	Required Rectification(s)
	Training Administrator indicated that the Application for RPL form is used for all processes. Application for RPL form includes illogical statements that bear little relationship to recognition of Qualifications. For example, it indicates that 'RPL is a self-assessment process aimed at determining credit and recognising the competencies students have obtained in formal and informal education and the work environment. This RPL process promotes RPL for equivalent units from updated training packages, with demonstrated vocational currency and a holistic, task-based assessment which focuses on relating assessment activities to actual job tasks'. This statement is not consistent with the definition of Credit Transfer, of national recognition, nor of RPL (refer to 1.5).	Ensure that the Application form is suitable for the purposes of recognition of Qualifications issued by other RTOs.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

CONDITION 8 - Accuracy and Integrity of Marketing	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> Website, http://www.firstknight.com.au/ 	

CONDITION 9 - Transition to Training Packages/Expiry of Accredited Courses	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> PR6.14.01.03 Transitioning to Updated Training Packages 	

CF.9.1	Finding	Required Rectification(s)
	PR6.14.01.03 Transitioning to Updated Training Packages addresses enrolments, and review of resources (it is not made clear if this includes training and assessment resources) but does not address the review of trainer/assessor current competence and any teach out procedures.	The RTO is to review and revise the procedure for transition to ensure that it addresses critical steps in the process.

Detailed Findings - AQTF Standards

ELEMENT 1.1 - The RTO collects, analyses and acts on relevant data for continuous improvement of training and assessment.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Interview with Quality Administrator • Policy: PO3.03 FKI Continuous Improvement Policy; PO3.14 FKI Professional Development of Staff • PR6.13.01.01 RTO – Continuous Quality Improvement • PR6.13.01.10 RTO – Release QMS Notification and Follow Up • Continuous Improvement Register. • FKI 2018 QMS Notification Register Policy: FKI PO3.15 Industry Engagement • FKI Industry Engagement Register – details each engagement • AQTF survey reports 2011–2017 • RTO Performance Indicators Report • Professional Development Log – for staff (PM, SC and JP) - • AQTF Learner Satisfaction surveys – completed examples and summary report of results <ul style="list-style-type: none"> - Student surveys via Survey Monkey – at 75% way through the unit – samples <p>Evidence indicates that data relating to training and assessment is collected, analysed and acted upon in a systematic and methodical way.</p>	

ELEMENT 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.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Training and assessment strategy – AMP40315 Certificate IV in Meat Processing (Leadership) • Training and assessment strategy – AMP30616 Certificate III in Meat Processing (General) 		
SF.1.2.1	Finding	Required Rectification(s)
The strategies indicate that 'formative' evidence is collected to inform the assessment decision. This is a misuse of the term 'formative' as this form of assessment is used for teaching quality and reflecting on student learning, rather than for making an assessment decision.		Review and revise the aforementioned strategies to ensure that it is clear how and when evidence is collected to make a summative decision.
SF.1.2.2	Finding	Required Rectification(s)
The strategies indicate that evidence gathering techniques for each unit include: workplace observation, interview (questioning), activity (or quiz), and a supervisor appraisal. The role of the supervisor across the assessment tools (i.e., only 3 methods and a decision of competence) and the Assessment Judgement Coversheet are inconsistent with this information.		Review and revise the aforementioned strategies to ensure that the role of the supervisor in the assessment decision is clear and unambiguous and aligns with the assessment tools.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

ELEMENT 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.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Interview with Training Administrator • Training and assessment strategy – AMP40315 Certificate IV in Meat Processing (Leadership) • Training and assessment strategy – AMP30616 Certificate III in Meat Processing (General) • Learning guides for the units below. <p>AMP30616 Certificate III in Meat Processing (General) <i>AMPA3068 Prepare and despatch meat products</i> <i>AMPCOR201 Maintain personal equipment</i></p> <p>AMP40315 Certificate IV in Meat Processing (Leadership) <i>AMPX418 Lead communication in the work place</i> <i>BSBMGT403 Implement continuous improvement</i></p>		
SF.1.3.1	Finding	Required Rectification(s)
	Refer to 1.4 and 1.5 for findings related to staff and assessment.	Refer to 1.4 and 1.5 for recommendations.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>ELEMENT 1.4 - Training and assessment is delivered by trainers and assessors who:</p> <p>a) have the necessary training and assessment competencies as determined by the National Quality Council or its successors, and</p> <p>b) have the relevant vocational competencies at least to the level being delivered or assessed, and</p> <p>c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken, and</p> <p>d) continue to develop their Vocational Education and Training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.</p>		<p>Non-Compliant</p>
<p>Evidence/Documentation Reviewed</p>		
<p>Personnel file of Peter Melican:</p> <ul style="list-style-type: none"> • CV • Working with children check • Qualifications • Matrix – both Qualifications (AMP30616 Certificate III in Meat Processing (General), AMP40315 Certificate IV in Meat Processing (Leadership)) • Professional development log 		
<p>SF.1.4.1</p>	<p>Finding</p>	<p>Required Rectification(s)</p>
<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The evidence provided did not confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.</p>		<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The RTO is to provide evidence to confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.</p>

<p>ELEMENT 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.</p>	Non-Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Application for RPL form • Assessment Policy • PR6.01.11 Conduct Enrolment Process • PR6.02.02.01 Application for Enrolment and Pre-Training Evaluation • PR6.02.03.02 Application for RPL • POLICY: PO3.08 FKI Validation of Assessment • PR6.13.06.01 Validation of Assessments • Validation schedule • Validation forms (Certificate III) • Student sample (Certificate III) • Interview with Training Administrator • Assessment tools for the below units: <p style="margin-left: 20px;">AMP30616 Certificate III in Meat Processing (General) <i>AMPA3068 Prepare and despatch meat products</i> <i>AMPCOR201 Maintain personal equipment</i></p> 	

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>AMP40315 Certificate IV in Meat Processing (Leadership) <i>AMPX418 Lead communication in the work place</i> <i>BSBMGT403 Implement continuous improvement</i></p>		
SF.1.5.1	Finding	Required Rectification(s)
	<p>AMP30616 Certificate III in Meat Processing (General) <i>AMPA3068 Prepare and despatch meat products</i> Assessment mapping indicates that the three assessment methods are: observation and questioning (interview) and the session activity (quiz). It excludes supervisor report (refer to 1.2). Assessment:</p> <ul style="list-style-type: none"> • Task Sheet (instructions for students) – indicates that the decision of competence is made once all 3 methods are demonstrated successfully. • Session activity – the conditions for the assessment are not made clear, e.g., open book, duration. The assessment is 10 multiple choice and short response questions. The score is 8 out 12. It is unclear how the 4 points (related to which question) can be not correct. Note that Q 4 is the only knowledge check for that Performance Criteria; therefore, if it is wrong there is no confirmed knowledge of that requirement. The last question is not quantified. • Observation: – Training Administrator indicated that multiple observations can occur; however, candidates are to demonstrate each indicator at least two consecutive times. This is not indicated in the instrument or the Task Sheet. • Oral questioning: – Administrator indicated that oral questioning only needs to be correct once. This is not indicated in the instrument or the Task Sheet. • Assessment Judgement Coversheet – includes a confirmation of competence by the supervisor. The role of the supervisor in the determination of competence is unclear. <p>The issues identified compromise the integrity of validity and reliability.</p>	<p>AMP30616 Certificate III in Meat Processing (General) <i>AMPA3068 Prepare and despatch meat products</i> <i>AMPCOR201 Maintain personal equipment</i> Review and revise the assessment tools to:</p> <ul style="list-style-type: none"> • Ensure that the all assessment methods are developed into an assessment tool, i.e., supervisor report • Ensure that valid and reliable judgements can be made.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p><i>AMPCOR201 Maintain personal equipment</i> Assessment:</p> <ul style="list-style-type: none"> • Task Sheet (instructions for students) – indicates that the decision of competence is made once all 3 methods are demonstrated successfully. • Session activity – the conditions for the assessment are not made clear, e.g., open book, duration. The assessment is 10 multiple choice and short response questions. Last question needs further clarification. The score is 8 out of 12. It is unclear how the 4 points (related to which question) can be not correct. • Observation: – Training Administrator indicated that multiple observations can occur; however, candidates are to demonstrate each indicator at least two consecutive times. This is not indicated in the instrument or the Task Sheet. Mapping indicates that performance 1.1, 2.2 and 3.1 are not observed, which is illogical. • Oral questioning: – Training Administrator indicated that oral questioning only needs to be correct once. This is not indicated in the instrument or the Task Sheet. • Assessment Judgement Coversheet – includes a confirmation of competence by the supervisor. The role of the supervisor in the determination of competence is unclear. <p>The issues identified compromise the integrity of validity and reliability.</p>	
SF.1.5.2 Finding	Required Rectification(s)
<p>AMP40315 Certificate IV in Meat Processing (Leadership) <i>AMPX418 Lead communication in the work place</i> Assessment:</p> <ul style="list-style-type: none"> • Task Sheet (instructions for students) – indicates that the decision of competence is made once all 3 methods are demonstrated successfully. 	<p>AMP40315 Certificate IV in Meat Processing (Leadership) <i>AMPX418 Lead communication in the work place</i> <i>BSBMGT403 Implement continuous improvement</i> Review and revise the assessment tools to:</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<ul style="list-style-type: none"> • Session activity – the conditions for the assessment are not made clear, e.g., open book, duration. The assessment is multiple choice and short response questions. The score is 8 out 12. It is unclear how the 4 points (related to which question) can be not correct. This is compounded by the fact that mapping indicates that there are multiple performance criteria assessed with only observation and the quiz. • Observation: – Training Administrator indicated that multiple observations can occur; however, candidates are to demonstrate each indicator at least two consecutive times. This is not indicated in the instrument or the Task Sheet. Observable behaviours are simplistic in several instances (e.g., Observe the student resolve or progress issues in complex and/or hostile environments), given the level of this Qualification. Observations are merely a re-write of the performance evidence with limited elaboration in the observable behaviour. The observation also indicates that there is a role play, but there are none described, no instructions to assessor or participants, nor is there a list of observable behaviours for this item. Some observable behaviours are in fact context statements and provide limited advice to the candidate or the assessor on the performance required. • Oral questioning: – Training Administrator indicated that oral questioning only needs to be correct once. This is not indicated in the instrument or the Task Sheet. • Assessment Judgement Coversheet – includes a confirmation of competence by the supervisor. The role of the supervisor in the determination of competence is unclear. <p>The issues identified compromise the integrity of validity and reliability.</p> <p><i>BSBMGT403 Implement continuous improvement</i> Assessment:</p> <ul style="list-style-type: none"> • Task Sheet (instructions for students) – indicates that the decision of competence is made once all 3 methods are demonstrated successfully. • Session activity – the conditions for the assessment are not made clear, e.g., open book, duration. The assessment is multiple choice and short response questions. The score is 4 out 6. It is unclear how the 2 points (related to which question) can be not correct. 	<ul style="list-style-type: none"> • Ensure that the all assessment methods are developed into an assessment tool, i.e., supervisor report • Ensure that valid and reliable judgements can be made.
---	---

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<ul style="list-style-type: none"> • Observation: – Training Manager indicated that multiple observations can occur; however, candidates are to demonstrate each indicator at least two consecutive times. This is not indicated in the instrument or the Task Sheet. Observable behaviours are simplistic, given the level of this Qualification, and in some instances are in fact context statements and provide limited advice to the candidate or the assessor on the performance required. • Oral questioning: – Training Manager indicated that oral questioning only needs to be correct once. This is not indicated in the instrument or the Task sheet. • Assessment Judgement Coversheet – includes a confirmation of competence by the supervisor. The role of the supervisor in the determination of competence is unclear. <p>The issues identified compromise the integrity of validity and reliability.</p>	
SF.1.5.2 Finding	Required Rectification(s)
<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>Interview with Training Administrator indicates that:</p> <ul style="list-style-type: none"> • The RPL process is driven by the trainer. • The form can be used for RPL, but also for recognition of Qualifications, RCC and Credit Transfer. • The process includes the use of the observation and questioning assessment tool for the unit (and excludes the quiz). However, this is assumed without interrogating the assessment tool mapping and ensuring that this will lead to a valid assessment judgement. <p>The form included illogical wording, which would confuse a student:</p> <p><i>RPL is a self-assessment process aimed at determining credit and recognising the competencies students have obtained in formal and informal education and the work environment. This RPL process promotes RPL for</i></p>	<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>Review and revise what information is provided in relation to RPL and ensure that the process supports the candidate and ensures that it will enable valid assessment judgements to be made.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

equivalent units from updated training packages, with demonstrated vocational currency and a holistic, task-based assessment which focuses on relating assessment activities to actual job tasks.

The form includes an option for self-assessment judgement, which is illogical on the form. The form does not explain how RPL assessments will occur. The RPL form would not support the candidate in the process nor ensure that valid evidence is collected.

There are no known instances of RPL

2.1 - The RTO establishes the needs of clients and delivers services to meet these needs.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • FKI Pre-Training Review Form • Pre-Training Review script 2018 – PowerPoint slides used by trainer during 1:1 interview • LLN Robot LLN reports x 3 students – FKI uses the commercial online tool 'LLN Robot' to determine ACSF scores • LLN Robot LLN training supplement – the program also compiles a customised LLN support activities document in response to any identified gap between a user's score and the requirements of their proposed course. This is noted in the Student Induction Guide as one of the support strategies that could be used with students identified as needing support. • Interview with Training Administrator John Price: <ul style="list-style-type: none"> - Provision of learning support to identified students – no records kept - The LLN Robot training supplement was not printed off and supplied to one student under discussion. - No list of external LLN providers is used by the trainer to advise applicants (confirmed by a phone call to the trainer). <p>Most employees are enrolled into Certificate II and acquire the required vocational LLN during their studies. Many of these are then able to continue to Certificate III studies. The delivery strategies and learning resources are strong in visual and oral elements to support the cohort.</p>		
SF.2.1.1	Finding	Required Rectification(s)
	Client needs are identified, but there is not sufficient or accurate information or evidence to show how they are met.	<p>Revise the Student Induction Guide so it accurately describes how student needs are met and includes a referral list of external LLN providers for the use of the trainer.</p> <p>Maintain records of how individual students with identified needs are supported over the duration of their studies.</p>

2.2 - The RTO continuously improves client services by collecting, analysing and acting upon relevant data.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none"> • Interview with Quality Administrator • Policy: PO3.03 FKI Continuous Improvement Policy: PO3.14 FKI Professional Development of Staff • PR6.13.01.01 RTO – Continuous Quality Improvement • PR6.13.01.10 RTO – Release QMS Notification and Follow Up • Continuous Improvement Register. • FKI 2018 QMS Notification Register Policy: FKI PO3.15 Industry Engagement • FKI Industry Engagement Register – details each engagement • AQTF survey reports 2011–2017 • RTO Performance Indicators Report • Professional Development Log – for staff (PM, SC and JP) - • AQTF Learner Satisfaction surveys – completed examples and summary report of results <ul style="list-style-type: none"> - Student surveys via Survey Monkey – at 75% way through the unit – samples 	
<p>Evidence indicates that data relating to training and assessment is collected, analysed and acted upon in a systematic and methodical way.</p>	

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

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.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • FKI Student Induction Manual and PPT • FKI Pre-Training Review Form • Pre-Training Review script 2018 		
SF.2.3.1	Finding	Required Rectification(s)
	<p>The Student Induction Manual:</p> <ul style="list-style-type: none"> • Refers in one instance to TQMS rather than First Knight • Welfare and guidance services – these are not provided by the RTO but by the HR department of Gathercole's, the employer. 	<p>Review and revise the Student Induction Manual to ensure that the information accurately reflects the services provided by the RTO.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

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.	Compliant
Evidence/Documentation Reviewed	
<ul style="list-style-type: none">• Training Plan• Industry engagement policy• Assessment Judgement Coversheet• Training Administrator• Interview with Quality Administrator• Interview with Training Administrator	

2.5 - Learners receive training, assessment and support services that meet their individual needs.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • FKI Pre-Training Review Form • Pre-Training Review script 2018 – PowerPoint slides used by trainer during 1:1 interview • LLN Robot LLN reports x 3 students – FKI uses the commercial online tool 'LLN Robot' to determine ACSF scores • LLN Robot LLN training supplement-- the program also compiles a customised LLN support activities document in response to any identified gap between a user's score and the requirements of their proposed course. This is noted in the Student Induction Guide as one of the support strategies that could be used with students identified as needing support. • Interview with Training Administrator John Price: <ul style="list-style-type: none"> - Provision of learning support to identified students – no records kept - The LLN Robot training supplement was not printed off and supplied to one student under discussion. - No list of external LLN providers is used by the trainer to advise applicants (confirmed by a phone call to the trainer). • FKI Student Induction Manual 		
SF.2.5.1	Finding	Required Rectification(s)
	Refer to findings for 2.1 and 2.3	Refer to recommendations for 2.1 and 2.3

2.6 - Learners have timely access to current and accurate records of their participation and progress.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Student Induction Manual • Enrolment letter 		
SF.2.6.1	Finding	Required Rectification(s)
	The Student Induction Manual notes that FKI will 'arrange access to your file at your request'. It does not explicitly inform candidates of their rights to access their records.	Make it clear in the Student Induction Manual that students have the right to access their records of participation and progress.

2.7 - The RTO provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • Interview with Quality Administrator • PO3.09 FKI Complaints and Appeals 		
SF.2.7.1	Finding	Required Rectification(s)
	<p>PO3.09 FKI Complaints and Appeals refers to the complaint being sent to the 'senior management team'. It is unclear who this represents, and the policy does not describe how or when the complaint will be heard and the students' rights within the process. The policy refers to the VRQA as 'experienced in dispute resolution processes' rather than only referring to the VRQA once all other avenues are completed. There is no general appeals process related to the complaints process.</p> <p>The assessment appeals process indicates the appellant can refer the appeal to the senior management team, and that the assessment appeal is referred to an independent assessor for examination and resolution. This stage of the process again refers to the VRQA in the same manner as mentioned above.</p> <p>There is no reference to the national complaints hotline.</p>	<p>Review and revise the complaints process and the assessment appeals process to ensure that it provides students with an appropriate mechanism that ensures due process and what rights the student has in the process.</p> <p>Ensure that all relevant information is included and that the references to the VRQA is accurate.</p>

3.1 - The RTO's management of its operations ensures clients receive the services detailed in their agreement with the RTO.		Non-Compliant
Evidence/Documentation Reviewed		
<ul style="list-style-type: none"> • FKI Student Induction Guide • FKI Pre-Training Review Form • Pre-Training Review script 2018 • LLN Robot LLN Reports x 3 students • LLN Robot LLN Training Supplement • Interview with Training Administrator John Page 		
SF.3.1.1	Finding	Required Rectification(s)
	Students do not receive the support services as detailed in the Student Induction Guide.	Ensure information about support services accurately describes what is actually provided by the RTO.

3.2 - The RTO uses a systematic and continuous improvement approach to the management of operations.	Compliant
<ul style="list-style-type: none"> • Interview with Quality Administrator • Policy: PO3.03 FKI Continuous Improvement Policy: PO3.14 FKI Professional Development of Staff • PR6.13.01.01 RTO – Continuous Quality Improvement • PR6.13.01.10 RTO – Release QMS Notification and Follow Up • Continuous Improvement Register. • FKI 2018 QMS Notification Register Policy: FKI PO3.15 Industry Engagement • FKI Industry Engagement Register – details each engagement • AQTF survey reports 2011–2017 • RTO Performance Indicators Report • Professional Development Log – for staff (PM, SC and JP) • AQTF Learner Satisfaction surveys – completed examples and summary report of results • Student surveys via Survey Monkey. <p>Evidence indicates that data relating to management of operations is collected, analysed and acted upon in a systematic and methodical way.</p>	

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

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.	N/A
The RTO does not have a relationship with an organisation that provides training or assessment services provided on its behalf.	

3.4 - The RTO manages records to ensure their accuracy and integrity.	Compliant
<ul style="list-style-type: none"> • PR6.05.16 Reporting of Training Data via SVTS • PR6.05.19 Archiving and Destruction of Learner Files • PR6.05.43 VETtrak – Access and Use • VETtrak 	

Detailed Findings – 2016 VRQA Guidelines for VET Providers

GUIDELINE 1.1 - An RTO must ensure that it has a current strategic plan and a detailed business plan which have been approved by its governing body.

**Not Audited in
Phase 2 audit**

- a) An RTO ensures the strategic plan details the overall vision, mission, board of directors and strategic directions of the RTO and clearly indicates that provision of vocational education is a primary purpose of the RTO.
- b) An RTO ensures the business plan details the operational and workforce development arrangements for a three year period that incorporates:
 - i. description of the business including an organisation chart, courses, location(s) and facilities
 - ii. a continuous improvement plan or risk management strategy
 - iii. a work force development plan
 - iv. strategic alliances with other education or service providers or third party arrangements
 - v. training and assessment delivery including proposed facilities and delivery hours

GUIDELINE 1.2 - An RTO demonstrates its financial viability and its capacity to sustain quality VET into the future by ensuring it has a three year financial plan that includes:

**Not audited in
Phase 2 audit**

- a) projected student enrolments by qualifications
- b) a range of financial indicators, including
 - i. cash flow
 - ii. current ratio of total current assets versus total current liabilities (equal to or greater than 1)
 - iii. debt ratio Total Liabilities/Total Assets (equal to or less than 1)
- c) the VET provider shows that it has a financial guarantor with the capacity to service the guarantee and/or to demonstrate sufficient working capital to operate for at least 6 months without tuition fees.
- d) details about whether any person involved in the management or provision of courses by the RTO meets any of the descriptions listed in section 4.3.11(2) of the Act.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

GUIDELINE 1.3 - An RTO ensures that it has management systems that include:

- a) management information including:
 - I. details of company incorporation in Australia (alternatively evidence of being an incorporated body in receipt of government funds)
 - II. a physical address of the company in Victoria for the purposes of serving notices
 - III. details of the directors, CEO/PEO and senior management members with associated police checks and Working With Children Checks if students are under 18 years of age
 - IV. confirmation that at least one Director or CEO/PEO has his/her principal residence in Victoria
 - V. contact arrangements for the CEO/PEO including during holidays and other closure periods
 - VI. a physical addresses for the location of financial, student and staff records including archives and computer back up storage
- b) a financial management system including a system for managing student fee payments and student refunds
- c) a student records management system that includes the capacity to provide the VRQA with AVETMISS compliant data and to ensure that copies of student records are
 - I. not able to be withheld from the RTO; and
 - II. able to be provided in electronic and print versions, at no cost to the VRQA in the event that the VET provider ceases operations
- d) a staff records management system including arrangements which ensure that for each staff member involved in training and assessment, the RTO holds verified documentation indicating each staff member's qualification and skills.

**Not audited in
Phase 2 audit**

GUIDELINE 1.4 - An RTO ensures that it has appropriate governance structures that includes:

- a) transparent governance and ownership arrangements, such as a Board of Directors, governing council, executive management and academic management
- b) a governance structure that includes appropriate appointments of persons for oversight of academic/educational integrity and quality assurance, such that:
 - i. for an RTO with anticipated ongoing operation of less than 150 equivalent full time students or an annual student fee turnover of less than \$1.5m per annum, persons are appointed with suitable qualifications and experience; and
 - ii. for all other RTOs, a governance committee is established that includes individuals who are independent of the RTO's ownership and are employed with suitable qualifications and experience
- c) a CEO/PEO and members of the RTO's senior management team with appropriate qualifications and educational experience.

**Not audited in
Phase 2 audit**

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 2.1 - An RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.</p> <ul style="list-style-type: none"> • A <i>third party</i> means any party that provides services on behalf of the RTO but does not include a party to a contract of employment with the RTO. • <i>Services</i> mean training, assessment, related educational or support services and/or any activities related to the recruitment of prospective students, but does not include student counselling, mediation or ICT support services. 		Non-Compliant
<ul style="list-style-type: none"> • Third party agreement • Invoice from FBS • Interview with Training Administrator • Interview with Quality Administrator • Interview with RTO Director 		
GF 2.1.1	Finding	Required Rectification(s)
<p>The third-party agreement is between Food Business Solutions Pty Ltd and First Knight Investments Pty Ltd. The third-party agreement does not clearly articulate the services as described at audit, which is more about servicing the RTO in terms of administration, quality assurance, development of training and assessment materials, Skills First compliance. The contract was signed in January 2013 and is ongoing. The contract does not include how the contract will be monitored and any reporting requirements of the third party.</p>		<p>Review and revise the service agreement to ensure that it accurately reflects the services provided and how the agreement will be monitored.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 2.2 – An RTO ensures that any third party delivering services on its behalf is required, under a written agreement, to cooperate with the VRQA:</p> <p>a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and b) for the purposes of the conduct of any audit or monitoring of its operations.</p>		<p>Non-Compliant</p>
<ul style="list-style-type: none"> • Third-party agreement • Interview with Training Administrator • Interview with Quality Administrator • Interview with RTO Director 		
GF 2.2.1	Finding	Required Rectification(s)
	<p>The third-party agreement is between Food Business Solutions Pty Ltd and First Knight Investments Pty Ltd. The third-party agreement does not ensure that the third-party is requirement to cooperate with the regulator.</p>	<p>Review and revise the third-party agreement to ensure that it clearly outlines that the third party cooperates with the regulator.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 2.3 – An RTO notifies the VRQA of any written agreement entered into under Guideline 2.2 for the delivery of services on its behalf:</p> <p>a) within 30 calendar days of the agreement being entered into or prior to the obligations under the agreement taking effect, whichever occurs first; and</p> <p>b) within 30 calendar days of the agreement coming to an end.</p>		<p>Non-Compliant</p>
<ul style="list-style-type: none"> • Third-party agreement • Interview with Training Administrator • Interview with Quality Administrator • Interview with RTO Director 		
GF 2.3.1	Finding	Required Rectification(s)
<p>The third-party arrangement has not been made clear to the VRQA. There are no internal processes to ensure that these requirements will be met.</p>		<p>Provide formal notification to the VRQA of the third-party agreement.</p> <p>Develop an internal process to ensure that the requirements of this Guideline will be met.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 2.4 – Information, whether disseminated directly by an RTO or by another party on its behalf, is both accurate and factual, including by:</p> <p>a) clarifying whether a third party is recruiting prospective students for an RTO on its behalf; and b) distinguishing where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party.</p>		<p>Non-Compliant</p>
<ul style="list-style-type: none"> • Third-party agreement • Student Induction Manual • Staff Handbook • Website, http://www.firstknight.com.au/ 		
GF 2.4.1	Finding	Required Rectification(s)
	<p>The marketing materials do not specify an third-party arrangements.</p>	<p>Ensure that the relationship between First Knight Investments Pty Ltd and Food Business Solutions Pty Ltd is referenced on the website.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 2.5 - Prior to the enrolment of students or the commencement of training and assessment, whichever comes first, an RTO t provides, in print or through referral to an electronic copy, current and accurate information that:</p> <p>a) enables the student to make informed decisions about undertaking training with the RTO and</p> <p>b) (at a minimum) includes the name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the student on an RTO's behalf</p>		Non-Compliant
<ul style="list-style-type: none"> • Third-party agreement • Student Induction Manual • Staff Handbook • Website, http://www.firstknight.com.au/ 		
GF 2.5.1	Finding	Required Rectification(s)
	<p>The information provided to applicants does not specify any third-party arrangements, nor the name and contact details of the third party.</p>	<p>Adjust the information provided prior to enrolment to include name and details of the third party.</p>

GUIDELINE 2.6 - Where there are any changes to agreed services, an RTO advises the student of those changes as soon as practicable, including in relation to any relevant changes to existing or new third party arrangements or changes in ownership.		Non-Compliant
<ul style="list-style-type: none"> • Third-party agreement • Student Induction Manual • Staff Handbook • Website, http://www.firstknight.com.au/ • Interview with Quality Administrator 		
GF 2.6.1	Finding	Required Rectification(s)
	The agreement or similar quality assurance documentation does not address how students will be informed if there are changes to the agreement.	Ensure that there are processes established to ensure that students will be informed of any changes to the agreement.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

GUIDELINE 2.7 - An RTO has a complaints policy to manage and respond to allegations involving the conduct of:		Non-Compliant
<ul style="list-style-type: none"> a) the RTO, its trainers, assessors or other staff; b) a third party providing services on the RTO's behalf, its trainers, assessors or other staff; or c) a student of the RTO. 		
<ul style="list-style-type: none"> • Interview with Quality Administrator • PO3.09 FKI Complaints and Appeals 		
GF 2.7.1	Finding	Required Rectification(s)
The complaints and appeals policy does not indicate how students can complain about any services provided by Food Business Solutions Pty Ltd.		Review and revise the complaints policy to ensure that it is clear that students can complain regarding services provided by the third party.

GUIDELINE 2.8 - An RTO has an appeals policy to manage a request for the review of a decision, including an assessment decision, made by an RTO or a third party providing services on the RTO's behalf.		Non-Compliant
<ul style="list-style-type: none"> • Interview with Quality Administrator • PO3.09 FKI Complaints and Appeals 		
GF 2.8.1	Finding	Required Rectification(s)
The complaints and appeals policy does not indicate how students can appeal any services provided by Food Business Solutions Pty Ltd.		Review and revise the complaints policy to ensure that it is clear that students can appeal any decision regarding services provided by the third party.

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 3.1 In addition to the requirements specified in Guidelines 3.2 and 3.3, an RTO's training and assessment is only delivered only by persons who have:</p> <ul style="list-style-type: none"> a) vocational competencies at least to the level being delivered and assessed; b) current industry skills directly relevant to the training and assessment being provided; and c) current knowledge and skills in vocational training and learning that informs their training and assessment. <p>Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.</p>		Non-Compliant
<p>Personnel file of Peter Melican:</p> <ul style="list-style-type: none"> • CV • Working with children check • Qualifications • Matrix – both Qualifications (AMP30616 Certificate III in Meat Processing (General), AMP40315 Certificate IV in Meat Processing (Leadership)) • Professional development log 		
GF 3.1.1	Finding	Required Rectification(s)
	<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The evidence provided did not confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.</p>	<p>AMP30616 Certificate III in Meat Processing (General) AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The RTO is to provide evidence to confirm that the trainer/assessor (Peter Melican) has continued to develop his trainer/assessor competence.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

GUIDELINE 3.2 An RTO's training and assessment is only delivered only by persons who have the qualifications specified in Item 1 or Item 2 of Schedule 1 of these Guidelines.

Compliant

Personnel file of Peter Melican:

- CV
- Working with children check
- Qualifications
- Matrix – both Qualifications (AMP30616 Certificate III in Meat Processing (General), AMP40315 Certificate IV in Meat Processing (Leadership))
- Professional development log

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

GUIDELINE 3.3 Where a person conducts assessment only, an RTO ensures that the person has the qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1 of these Guidelines.	N/A
N/A	

GUIDELINE 3.4 Where the RTO, in delivering training and assessment, engages an individual who is not a qualified trainer and/or assessor, the individual works under the supervision of a qualified trainer and/or assessor and must not determine assessment outcomes.	N/A
N/A	

GUIDELINE 3.5 An RTO ensures that any individual working under the supervision of a trainer:	N/A
<ul style="list-style-type: none"> a) holds the skill set defined in Item 4 of Schedule 1 of these Guidelines; b) has vocational competencies at least to the level being delivered and assessed; and c) has current industry skills directly relevant to the training and assessment being provided. 	
N/A	

GUIDELINE 4.1 - An RTO's training and assessment strategies and practices, including the amount of training it provides, are consistent with the requirements of the training packages and VET accredited courses and enable each student to meet the requirements for each unit of competency or module in which the student is enrolled.		Non-Compliant
<ul style="list-style-type: none"> • Training and assessment strategy – AMP40315 Certificate IV in Meat Processing (Leadership) • Training and assessment strategy – AMP30616 Certificate III in Meat Processing (General) • Interview with Quality Administrator 		
GF 4.1.1	Finding	Required Rectification(s)
	<p>AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The strategy indicates that the program is typically delivered over 12–14 months. The strategy notes that there are 3099 hours of volume of learning; however, it does not make clear the separation between training/learning conducted by the trainer and that of assessment (other than the session activity [quiz]).</p>	<p>AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>Revise the strategy so that the amount of training can be identified distinct from time allocated to assessment.</p>
GF 4.1.2	Finding	Required Rectification(s)
	<p>AMP30616 Certificate III in Meat Processing (General)</p> <p>The strategy indicates that the program is delivered over 12–14 months, with typical completions between 8 and 10 months. The strategy notes that there are 2545 hours of volume of learning; however, it does not make clear the separation between training/learning conducted by the trainer and that of assessment (other than the session activity [quiz]).</p>	<p>AMP30616 Certificate III in Meat Processing (General)</p> <p>Revise the strategy so that the amount of training can be identified distinct from time allocated to assessment.</p>

Audit Date: 23 & 24 April 2018

RTO: First Knight Investments Pty Ltd

<p>GUIDELINE 4.2 - For the purposes of Guideline 4.1, an RTO determines the amount of training it provides to each student with regard to:</p> <p>a) the existing skills, knowledge and the experience of the student; b) the mode of delivery; and 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.</p>		<p>Non-Compliant</p>
<ul style="list-style-type: none"> • Training and assessment strategy – AMP40315 Certificate IV in Meat Processing (Leadership) • Training and assessment strategy – AMP30616 Certificate III in Meat Processing (General) • Interview with Quality Administrator 		
GF 4.2.1	Finding	Required Rectification(s)
<p>AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>The strategy indicates that the program is typically delivered over 12–14 months. The strategy notes that there are 3099 hours of volume of learning; however, it does not make clear the separation between training/learning conducted by the trainer and that of assessment (other than the session activity [quiz]).</p>		<p>AMP40315 Certificate IV in Meat Processing (Leadership)</p> <p>Revise the strategy so that the amount of training can be identified distinct from time allocated to assessment.</p>
GF 4.2.2	Finding	Required Rectification(s)
<p>AMP30616 Certificate III in Meat Processing (General)</p> <p>The strategy indicates that the program is delivered over 12–14 months, with typical completions between 8 and 10 months. The strategy notes that there are 2545 hours of volume of learning; however, it does not make clear the separation between training/learning conducted by the trainer and that of assessment (other than the session activity [quiz]).</p>		<p>AMP30616 Certificate III in Meat Processing (General)</p> <p>Revise the strategy so that the amount of training can be identified distinct from time allocated to assessment.</p>