

Performance assessment (audit) report



HRD Integrated Services Pty Ltd as
Trustee for Nankervis Family Trust

RTO number: 22116
CRICOS number: N/A
Date report finalised: 11 October 2021



Australian Government
Australian Skills Quality Authority

ASQA

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Performance Assessment and Provider Details

Provider details

Provider's legal name: HRD Integrated Services Pty Ltd as Trustee for Nankervis Family Trust

Trading name: HRD Integrated Services

RTO number: 22116

CRICOS number: N/A

Performance assessment details

Application numbers: ADDVET0036718
ADDVET0037791
ADDVET0037792

Audit number: AUDREC0011453

Performance assessment (audit) reason: Application - Change

Date of opening meeting: 30 June 2021

Dates of interviews: 10 and 11 August 2021

Date of closing meeting: 25 August 2021

Provider's contact details for performance assessment (audit): Mr Phillip Nankervis
phil@hrdi.com.au
0419 889 189

Address/es of site/s visited (if applicable): N/A

Performance assessment team

Lead Assessment Officer: Andrea Masters

Assessment Officers (if applicable): N/A

Report Summary

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs).

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

Correcting a non-compliance may require:

- correcting a process or system that has led to the non-compliance, and implementing a revised process or system.

Performance assessment findings

Report completed by: Andrea Masters.

Practice	Findings	Standards for RTOs (Clauses)
Training and Assessment	Compliant	1.1, 1.2, 1.3, 1.6, 1.9, 1.13, 1.14, 1.16
	Not Compliant	1.8
Completion	Compliant	3.1
Marketing and Recruitment	Compliant	4.1
Enrolment	Compliant	5.1, 5.2
Regulatory Compliance and Governance	Compliant	2.3, 2.4, 6.5, 7.1, 8.6
	Not Compliant	2.2, 8.2

Provider background

Summary of provider and management structures

Phil Nankervis is the CEO of the organisation. He is supported by the Training Manager, Darryl McInerney, Lisa Heslington (accounts), Kylie O'Connor and Erin Dober (administration/project support) and two trainers and assessors, John Towler and Hans Breet.

Scope of provider's registration

The provider's scope of registration comprises training products from the UEE, TLI, HLT and UEP Training Packages, encompassing five qualifications and 26 units of competency. These include superseded qualifications and units of competency that are in teach-out mode.

Furthermore, on 26 March 2021, the provider submitted applications to add *UEE30820 Certificate III in Electrotechnology Electrician* to its scope of registration, and subsequently on 19 June 2021 the following units of competency, *UEECD0007 Apply work health and safety regulations, codes and practices in the workplace* and *UEERL0005 Locate and rectify faults in low voltage (LV) electrical equipment using set procedures*.

Suburb and state of all delivery sites

- Newport, VIC
- Petersham, NSW (via third party provider)
- Campbellfield, VIC (via third party provider).

Third party usage

The provider has third party arrangements for the delivery of training and/or assessment with:

- A & S Training Pty Ltd (A & S)
- Electrical Training Academy (ETA)
- Metro Trains Melbourne
- Up-Train Pty Ltd.

Core clients/target groups

The core clients are employees from employers in the rail industry. There is no public enrolment.

Training Revenue (Funded or fee for service)

- Fee for service.

Total numbers of current enrolment with the provider as of day of closing meeting

- UEE41211 Certificate IV in Electrical – Rail Signalling (47)
- TLI31918 Certificate III in Mechanical Rail Signalling (2)
- UEE41220 Certificate IV in Electrical – Rail Signalling (28)
- TLI31920 Certificate III in Mechanical Rail Signalling (13)
- Various individual units within the qualifications on its scope (67).

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

- information provided by students as part of a student survey or interview
- information provided directly by HRD Integrated Services Pty Ltd as Trustee for Nankervis Family Trust to ASQA
- existing information and records held by ASQA concerning HRD Integrated Services Pty Ltd as Trustee for Nankervis Family Trust
- information provided to ASQA's assessor, interviews and observations, and documentation reviewed during the performance assessment (audit) of HRD Integrated Services Pty Ltd as Trustee for Nankervis Family Trust
- other publicly available information - including but not limited to, information published on the provider's and third party websites.

Training products sampled

Training Products	Mode/s of delivery/ assessment*	Current enrolments
<p><i>UEE30820 Certificate III in Electrotechnology Electrician</i></p> <ul style="list-style-type: none"> • <i>UEEEL0012 Install low voltage wiring, appliances, switchgear and associated accessories</i> • <i>UEEEL0024 Test and connect alternating current (a.c) rotating machines</i> 	Mixed	Nil
<p><i>UEE41220 Certificate IV in Electrical – Rail Signalling</i></p> <ul style="list-style-type: none"> • <i>UEERS0019 Test copper rail signalling cables</i> • <i>UEERS0001 Assemble and wire internal electrical rail signalling equipment</i> 	Mixed	28
<p><i>UEERL0005 Locate and rectify faults in low voltage (LV) electrical equipment using set procedures</i></p>	Mixed	Nil
<p><i>UEECD0007 Apply work health and safety regulations, codes and practices in the workplace</i></p>	Mixed	Nil
<p><i>UETDRRF06B Perform rescue from a live LV panel</i></p>	Mixed	Nil

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

Interviewees

This includes all individuals interviewed during the entirety of the performance assessment (audit) process.

Full name	Position
Phil Nankervis	CEO
John Towler	Trainer and Assessor (HRD)
Robert Neloski	Trainer and Assessor (A&S)
Joe Morrin	Trainer and Assessor (ETA)

Areas of non-compliance and action/s required

Training and Assessment

Assessment

Standards for RTOs 2015 – Standard 1

The RTO's training and assessment strategies and practices are responsive to industry and learner needs and meet the requirements of training packages and VET accredited courses.

Clause 1.8

Finding: Not compliant

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

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

Key sources of evidence relevant to finding

Evidence provided prior to August 2021:

- 22116 HRD CEO Dec-addition to scope.pdf
- HRD-UEE30820 RPL unit evidence handbook MASTER v0.2 09July21.pdf
- HRD-RS3.3 Lesson Plan v0.3 7July2021.pdf
- HRD-UEERS0001 Wiring internal WPA-V3.5.pdf

Evidence provided on 3, 10 and 11 August 2021:

- 2021-08-11 FW: FW: Further evidence - UEECD0007 Apply work health and safety regulations, codes and` practices in the workplace
- UEECD0007-UAP-R1.0.pdf
- UEECD0007-ULP-R1.0.pdf.
- Energy Space LMS+User+Guide+v5+teacher+version.pdf
- Energy Space Portal P Nankervis Access email_ Instructions.pdf
- Energy Space Portal Teacher Access email_ Instructions.pdf
- Energy+Space+--+Lighthouse+Guide+v5+teacher+version.pdf
- hrd integrated services exemplar- lms ra eprofiling - HRD ETA signed.pdf
- UEEEL0012_AssessmentRequirements_R1-ETANotes.pdf
- UEEEL0012_R1-ETANotes.pdf
- UEEEL0024_AssessmentRequirements_R1-ETA Notes.pdf
- HRD-UEE30820 RPL unit evidence handbook MASTER v0.2 09July21.pdf.
- Completed student assessments:
 - 1-5 students.zip (A4121899).zip
 - 6-10 students.zip
 - Emails (x5) dated 2021-08-11 RE: ROL – further query (IN)

- Interview and emails with Phil Nankervis on 10 & 11 August 2021 and 17 September 2021 respectively.

Evidence provided on 17 September 2021 (following closing meeting):

- Courseware_ UEECD0007 Apply work health and safety regulations, codes and practices in the workplace (R1.0).pdf
- CD0007 CPR Quiz.pdf
- CD0007 Manual Handling Quiz.pdf
- CD0007 WHS online Knowledge quiz.pdf
- HRD-CD0007 Learner Guide Part 1.1 new cover V0.7.pdf
- HRD-CD0007 Learner Guide Part 1.2 new cover V0.7.pdf
- HRD-CD0007 Learners guide part 1.3 Elec Fires - Ver0.4.pdf
- HRD-UEECD0007 TAS (deliver & assess) v1.0 100921.pdf
- Online Learning - CD0007 Quiz suite.jpg
- Re_ General REL questions - email.pdf
- Re_ RL0004 + CD0007 Mapping versus ETA Validation - email.pdf.
- HRD-EL0024 Test and connect alternating current (a.c.) rotating machines WPA v1.0.pdf
- UEEEL0024 Written Assessment V1.0.pdf
- HRD-EL00024 competency mapping v1.0 190621.pdf
- HRD-EL0012 Install low voltage wiring, appliances, switchgear and associated accessories WPA v1.0.pdf
- UEEEL0012 Written Assessment V1.0.pdf
- HRD-EL00012 competency mapping v1.0 190621.pdf
- Interviews with Phil Nankervis on 11 & 12 August 2021
- Files Notes of Opening Meeting with Phil Nankervis, dated 30 June 2021
- Emails from Phil Nankervis dated 17 September 2021.

Evidence analysis

A provider must develop and implement an assessment system to ensure:

- all assessment requirements of the relevant training package are met
- the Principles of Assessment and Rules of Evidence are applied in the assessment practices.
 - The Principles of Assessment require that no matter which assessment pathway or method a provider uses, the principles of fairness, flexibility, validity and reliability must be met. The Rules of Evidence require that the evidence used to make a decision about competence must be valid, sufficient, authentic and current.

Furthermore, ASQA's General Direction '*Resourcing requirements – for applicants seeking initial registration or change to scope of registration*' (14 December 2021), specifies the resource requirements that an organisation must meet at the time of lodging an application to change its scope of registration, which includes an assessment system.

UEE30820 Certificate III in Electrotechnology Electrician

- During the Performance Assessment Opening Meeting on 30 June 2021, Phil Nankervis advised that he will be seeking to include accredited course 10809NAT on the RTO's scope of registration. He further stated that this accredited course requires a provider to already have *UEE30820 Certificate III in Electrotechnology Electrician* on its scope of registration. He advised the RTO does not intend to deliver or market UEE30820 in full, rather its strategy will be to offer both training and assessment and RPL pathways to the following prospective students:
 - Candidates who hold 10809NAT and an Overseas Trade Recognition (OSTR) certificate via an RPL assessment process, which will be undertaken by a third party, Electrical Training Academy (ETA)
 - Qualified electricians, who are trainees
 - Apprentices undertaking other programs who require specialised training and assessment.

On 20 July 2021, the assessment tools for two units within *UEE30820 Certificate III in Electrotechnology Electrician* were requested from the provider, namely *UEEEL0012 Install low voltage wiring, appliances, switchgear and associated accessories* and *UEEEL0024 Test and connect alternating current (a.c.) rotating machines*. On 3 August 2021, the provider's response included RPL assessment tools, which by themselves did not fully align to the provider's documented training and assessment strategy, which included both RPL and training and assessment pathways.

At the closing meeting on 26 August 2021, the applicant had not provided assessment tools for the two sampled units to support a training and assessment pathway for the qualification in accordance with its training and assessment strategy (that is, the applicant had not fully demonstrated compliance with clause 1.8). Note: the provider submitted further evidence (on 17 September 2021) following the closing meeting which confirmed that it did have assessment tools for the two sampled units from the qualification.

With consideration of the further evidence provider on 17 September 2021, the provider has now demonstrated compliance with the requirements of clause 1.8 for the qualification *UEE30820 Certificate III in Electrotechnology Electrician*.

Substantial impact to vocational outcome

- With respect to the following sampled training products, the evidence obtained through ASQA's performance assessment does not demonstrate that the students possess the skills and knowledge to undertake the intended vocational outcome. Furthermore, that the provider has not implemented a sufficient assessment system.

UEE41220 Certificate IV in Electrical – Rail Signalling

- Phil Nankervis advised that 90% of this qualification is delivered in Victoria with the remaining percentage in NSW. Where Recognition of Prior Learning (RPL) is applicable, an RPL form, including benchmarking is used, along with two Workplace Assessments (WPA). Regarding RPL, the provider's website states 'Evidence portfolio must be supported by a practical demonstration of knowledge and skills'. Furthermore, the RTO's procedure titled 'RPL guidance notes' for UEE41211 (superseded version) states 'All candidates in the work history but no qualification category will undergo at least one

workplace practical assessment. Two WPAs will be required where there is insufficient evidence to fully satisfy unit EKAS' (essential knowledge and skill) 'requirements'.

When queried, Phil Nankervis stated he personally checks the RPL competency judgement undertaken by the trainer and assessor and ensures there are two WPAs. Phil further explained that where the trainer and assessor has knowledge and/or experience of the student's skills in the workplace, this means the evidence would be authentic, so only one WPA is required in this circumstance.

However, upon review of the completed RPL assessments (RPL forms) for the five students (PO, SJ, GC, IN, LB (WPA provided)) WPAs were not provided for four students. When these were requested for two of the four students, GC and IN, for units *UEERS0019 Test copper rail signalling cables* and *UEERS0001 Assemble and wire internal electrical rail signalling equipment*, Phil was able to demonstrate that GC held the equivalent units from the superseded qualification (UEE41211), therefore no WPA was applicable. However, his explanation for IN was that this student had WPA's conducted for several other units. This system was not considered sufficient to meet the principles of assessment or rules of evidence, given the organisation has no mechanism in place for the assessor to identify that the requirements of the above two units are met via WPA's covering other units.

Additionally, the assessor for student IN, John Towler was noted to have ticked all of the performance evidence criteria listed on the RPL form for each of these units where relevant, yet in the notes section he had recorded '*no or minimal evidence to support competency, suggest workplace assessment and questioning by HRD assessor*'. When queried, Phil Nankervis advised that a different trainer and assessor, Hans Breet would have conducted a workplace assessment. However, whilst WPA's had been completed for other units of competency within the qualification, none appeared to relate to two units mentioned above.

The review of completed assessments also identified variances in assessment practice. Whilst John Towler (HRD Victoria) had ticked all/some performance evidence criteria, Robert Neloski (third party provider A&S, NSW) did not tick any performance evidence criteria. Therefore, the provider has not ensured the assessment system is reliable regarding the judgements made of student competency between assessors, including those undertaken by third party trainers and assessors.

UEECD0007 Apply work health and safety regulations, codes and practices in the workplace

- The delivery schedule in the training and assessment strategy (TAS) for this unit of competency states the practical assessment will be assessed via one of two streams (where not already achieved by the provision of a Statement of Attainment). Therefore, assessment of *UEECD0007* will be undertaken during the practical workplace assessment of either *UEERL0005* or *UEEEL0004*.

The Observation Checklist in the WPA for *UEERL0005* did not sufficiently assess the following performance evidence requirement specified in the training package for unit *UEECD0007*, '*Demonstrating safe methods of removing an electric shock victim from a live electrical situation*'.

The observation checklist includes the observable behaviours relevant to unit, *UEEDC0007*:

- Prepare to fault-find electrical equipment
- Hazards identified
- Risk controls discussed
- JSA completed
- PPE selected and checked
- LV Gloves correctly tested
- Correct manual handling techniques are planned to relocate tools and spare parts into the work area
- Under heading Locate faults in electrical equipment
- WHS/OHS policies and procedures are followed

It also includes one verbal question asked by the assessor; 'Provide examples of PPE you will need and how these are checked?' The benchmark answer for this verbal questions states '*LV gloves = air test and inspection for no-damage + date; Hard hat (site dependent) ; eye wear = clear not damaged; cotton full length arm + leg clothing = complete and clean; steel cap boot = correctly fitting and clean ; Face mask = clean*'.

Therefore, the assessment system is not sufficient for *UEEDC0007* as it does not assess performance evidence '*Demonstrating safe methods of removing an electric shock victim from a live electrical situation*'.

Performance assessment (audit) finding

Not compliant

The provider has not demonstrated that its assessment system:

- complies with the requirements of the relevant training products
- ensures that assessment is conducted in accordance with the Principles of Assessment and Rules of evidence.

Action required

Provide evidence that demonstrates:

- The provider has rectified its assessment practices (to comply with Clause 1.8) and has established appropriate systems that are followed. The evidence to be provided must:
 - demonstrate the provider will implement an assessment system that ensures assessment:
 - complies with the requirements of the relevant training products
 - will be conducted in accordance with the Principles of Assessment and Rules of evidence.
 - Include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant.

Regulatory Compliance and Governance

Staffing/ Management

Standards for RTOs 2015 – Standard 2

The operations of the RTO are quality assured.

Clause 2.2

Finding: Not compliant

The RTO:

- c) systematically monitors the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1; and
- d) 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.

Key sources of evidence relevant to finding

Evidence provided on 3, 10 and 11 August 2021:

- HRD-Business management & governance policy & procedure v2.1 140721.pdf
- HRD-Complaints & appeals policy v2.0 020616.pdf
- HRD-Document retention & results release advice v2.1 300718.pdf
- HRD-Scope of registration policy and procedure v1.0 1
- HRD-Quality & continuous improvement policy v1.0 030220.pdf
- HRD-Complaints & appeals policy v2.0 020616.pdf
- HRD-Assessment validation policy and procedure v1.1 100721.pdf
- HRD-Information about assessment validation and moderation v1.0 280616.pdf
- HRD-Instructions to assessors v1.3 280616.pdf
- HRD-Issuing qualifications v3.1 290816.pdf
- HRD-Mutual recognition policy & procedure v1.1 210915.pdf
- HRD-RPL & RCC policy & procedure v2.0 071217.pdf
- HRD-SME guidelines v0.1 280917.pdf
- HRD-UJEE41211 RPL guidance notes v1.2 060716.pdf
- Email dated 2021-08-10 certificates1.

Evidence provided between 10 and 25 August, re issuance of UETTDRRF06B:

- 2021-08-10 Updated So A - to student
- 2021-08-12 Replacement of SoA with incorrect F06 code
- 2021-08-13 F06B - F06 certificate - Student acknowledge received
- 2021-08-25 FW: Wisenet report re 06B unit.

Evidence provided on 17 September 2021 (following closing meeting):

- HRD-Continuous improvement policy and procedure v1.3 ED DRAFT.pdf80615.pdf

- Continuous Improvement Register 2021-2022.xls.

Evidence analysis

The provider is required to implement quality training strategies and practices and monitor these to ensure they meet the training package and VET course requirements.

Whilst the provider has a policy titled 'Scope of Registration Policy and Procedure', which states the Training Manager is to monitor the training.gov.au website for changes to the status of relevant Training Packages, accredited courses or units of competency by using the TGA notification facility, this procedure was not sufficient to ensure that students were issued the relevant certification.

Specifically:

- Upon review of issuance documentation for five students (GM, RG, HB, DG, MG) it was found they had been issued Statements of Attainment for superseded unit, *UETTDRRF06B Perform rescue from a live LV panel* between March and June 2021. Whilst this unit is equivalent to unit UETTDRRF06, its transition period ended on 24 September 2020.

Additionally, document titled 'HRD-Quals UoC Validation activity record' identifies the provider conducted a validation of this unit on 23 April 2021, stating that no changes were required, several of these students were issued these qualifications after this validation date. Whilst the CEO was unable to provide a reason for this occurrence during the interview, Phil Nankervis subsequently advised by email dated 12 August 2021 that he had reprinted and signed revised Statements of Attainment, along with an explanatory letter which has been forwarded to administration staff to be emailed to a total of 17 students, which the RTO's Wisenet system had identified as affected.

- The provider has a range of policies and procedures, and practices to ensure its strategies and practices meet the requirements of the Standards, including the Continuous Improvement (ci) Policy, which refers to various related documents, including the CI Register. However, upon review, it was noted that the register included no entries between November 2020 and July 2021. When queried about this, Phil Nankervis agreed it had not been updated, explaining that the organisation had been impacted by the ongoing Covid restrictions in Victoria, all staff working remotely and the Training Manager's long-term leave.

Notwithstanding, the provider has not followed its continuous improvement policy and procedures to ensure its operations are quality assured.

Performance assessment (audit) finding

Not compliant

The provider has not demonstrated that it:

- systematically monitors the RTO's training and assessment strategies and practices to ensure ongoing compliance with Standard 1, and

- systematically evaluates and uses the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices.

Action required

Provide evidence that demonstrates:

- The organisation has implemented appropriate systems and practices to monitor training and assessment strategies and practices to ensure ongoing compliance with Standard 1.
The organisation has implemented appropriate systems that are followed to evaluate and use the outcomes of the evaluations to continually improve the RTO's training and assessment strategies and practices.

Standards for RTOs 2015 – Standard 8

The RTO cooperates with the VET Regulator and is legally compliant at all times.

Clause 8.2

Finding: Not compliant

The RTO:

8.2. The RTO ensures that any third party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) in the conduct of audits and the monitoring of its operations.

Key sources of evidence relevant to finding

- hrd-a+s training auspice agreement version a 10062020_signed 20200612.pdf
- HRD-ETA Auspice Agreement Version B 13 July21 mDRAFT.pdf
- HRD-ETA Auspice Agreement Version A 190719 signed.pdf
- HRD-ETA Auspice Agreement Version A 190719 signed.pdf
- mtm auspice signed sept2019.pdf.

Evidence analysis

The provider is required to ensure its written agreements with any third parties that provide services on its behalf include a statement requiring the third party to cooperate with the VET Regulator, regarding information requests, and in the conduct of audits and monitoring of its operations.

None of the organisation's written agreements with the following third parties, included the required provisions as required by Clause 8.2 a) and b) as stated above.

- A & S Training Pty Ltd (A & S)

- Electrical Training Academy (ETA)
- Metro Trains Melbourne
- Up-Train Pty Ltd.

Performance assessment (audit) finding

Not compliant

The provider did not include a provision in its written agreements with its third parties requiring the third party to cooperate with the VET Regulator.

Action required

Provide evidence that demonstrates:

- The RTO's third party written agreements require the third party to cooperate with the VET Regulator:
 - by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
 - in the conduct of audits and the monitoring of its operations.