



# REPORT

## Audit report: BPG Pty Ltd

|                       |            |
|-----------------------|------------|
| RTO number:           | 41529      |
| CRICOS number:        | n/a        |
| Date/s of site visit: | n/a        |
| Date report created:  | 24/02/2021 |
| Date report updated:  | 20/05/2021 |

## Provider details

|                        |                                                |
|------------------------|------------------------------------------------|
| Provider's legal name: | BPG Pty Ltd                                    |
| Trading name/s:        | Entry Education<br>MRT Training<br>BPG Pty Ltd |
| RTO number:            | 41529                                          |
| CRICOS number:         | n/a                                            |

## Audit team

|               |              |
|---------------|--------------|
| Lead auditor: | Jane CONNORS |
| Auditor/s:    | n/a          |

## Audit details

|                                               |                                                                    |
|-----------------------------------------------|--------------------------------------------------------------------|
| Application number/s:                         | n/a                                                                |
| Audit number/s:                               | AUDREC0011084                                                      |
| Audit reason/s:                               | Compliance Monitoring                                              |
| Date of opening meeting/discussion            | 21/01/2021                                                         |
| Date of closing meeting/discussion            | 28/01/2021                                                         |
| Provider's contact for audit:                 | Tony Rowe<br>CEO<br>tony@myrealestatetraining.com.au<br>1300115144 |
| Address/es of site/s visited (if applicable): | n/a                                                                |

## Summary of audit findings

### Audit finding: Serious non-compliance

Report completed by: Jane CONNORS

| Practice                           | Standards for RTOs                     | Finding       |
|------------------------------------|----------------------------------------|---------------|
| Training and Assessment            | 1.1, 1.2, 1.3, 1.8*, 1.13*, 1.14, 1.16 | Not compliant |
| Marketing/Recruitment Practices    | 4.1*                                   | Not compliant |
| Enrolment                          | 5.1*, 5.2*, 5.3, 7.3                   | Not compliant |
| Support and Progression            | 1.7                                    | Compliant     |
| Completion                         | 3.1*                                   | Not compliant |
| Regulatory Compliance / Governance | 2.3, 2.4*, 8.2                         | Not compliant |

\*Indicates a non-compliant clause

## Summary of findings following response

**Audit finding: Not compliant**

**Report completed by:** Jane CONNORS

| Practice                           | Standards for RTOs                    | Finding       |
|------------------------------------|---------------------------------------|---------------|
| Training and Assessment            | 1.1, 1.2, 1.3, 1.8, 1.13*, 1.14, 1.16 | Not compliant |
| Marketing/Recruitment Practices    | 4.1                                   | Compliant     |
| Enrolment                          | 5.1, 5.2, 5.3, 7.3                    | Compliant     |
| Support and Progression            | 1.7                                   | Compliant     |
| Completion                         | 3.1                                   | Compliant     |
| Regulatory Compliance / Governance | 2.3, 2.4, 8.2                         | Compliant     |

## Background

Summary of provider and management structure:

- BPG Pty Ltd (the RTO) was first registered in June 2016 with registration expiring 16 June 2023.
- Tony Rowe is the CEO and his sister, Jacinta Rowe manages compliance.
- In September 2020 the RTO notified ASQA it had sold 100 % of shares in BPG Pty Ltd to Education and Careers Institute Pty Ltd (E&CI). E&CI, trading as Entry Education was a third party with the RTO prior to the sale. Tony remains CEO and he and Jacinta are continuing to assist E&CI in transitioning processes and practices in 2021. Jacinta Rowe will be handing over compliance management to Samantha Rich from E&CI in 2021.
- Trainers are mostly third party providers with signed third party agreements in place with the RTO. Tony Rowe is also a qualified trainer/assessor and so is Ryan Keys, RTO Director.

Scope of provider's registration:

- *CPP40307 Certificate IV in Property Services (Real Estate)*
- *CPP41419 Certificate IV in Real Estate Practice*
- *CPP50307 Diploma of Property Services (Agency Management)*
- *CPP51119 Diploma of Property (Agency Management).*

Suburb and state of all delivery sites:

- All jurisdictions.

Third party usage:

- The provider has third party agreements with all trainer/assessors who also provide recruitment, enrolment and learner support services. 10 third party agreements are registered with ASQA.

Core clients/target groups:

- Real estate employees and career changers.

Training Revenue (Funded or fee for service):

- fee for service.
- federally funded trainees.

Total number of current enrolments in the organisation as at 22/01/2021:

- 6257

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

- information provided by students as part of a student survey or interview
- information provided directly by BPG Pty Ltd to ASQA
- existing information and records held by ASQA concerning BPG Pty Ltd
- information provided to ASQA's auditors and documentation reviewed during the site visit of BPG Pty Ltd conducted on 21 January 2021
- other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

## Training products sampled

| Training Products                                                 | Mode/s of delivery/assessment* | Current enrolments |
|-------------------------------------------------------------------|--------------------------------|--------------------|
| <i>CPP41419 Certificate IV in Real Estate Practice</i>            | Distance                       | 808                |
| <i>CPP40307 Certificate IV in Property Services (Real Estate)</i> | Distance/RPL                   | 5442               |

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

## Interviewees

| Name         | Position                        | Training products                                      |
|--------------|---------------------------------|--------------------------------------------------------|
| Tony Rowe    | CEO                             | <i>CPP41419 Certificate IV in Real Estate practice</i> |
| Jacinta Rowe | MRT Training Compliance Manager |                                                        |

## About this Report

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

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

Correcting a non-compliance may require:

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

## Areas of non-compliance and action required

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs - 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

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

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

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

##### Key sources of evidence relevant to finding

*CPC41419 Certificate IV in Real Estate Practice*

*CPPREP4004 Establish marketing and communication profiles in real estate*

- Assessment tools:
  - Assessment booklet
  - Assessment mapping tool
  - Assessment marking guide
- Completed student assessment records for:
  - WC Student ID: 20428
  - JG Student ID: 20850
- Training package requirements <https://training.gov.au/Training/Details/ CPPREP4004>
  - Completed student assessment records: WC and JG

*CPP40307 Certificate IV in Property Services (Real Estate)*

- Completed student assessment records, including RPL for:
  - AE Student ID: 20692
  - BS Student ID: 20868
  - JC Student ID: EEQ2535 third party trainer/assessor Rayda Palma-Parazo (Entry Education)
- Training package requirements <https://training.gov.au/Training/Details/ CPP40307>

Interviews held 21 and 28 January 2021:

- Tony Rowe CEO
- Jacinta Rowe Compliance Manager

##### Evidence analysis

A provider must develop and implement a 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

## Evidence analysis

that the evidence used to make a decision about competence must be valid, sufficient, authentic and current.

The evidence does not support that the provider has implemented an assessment system that ensures assessment complies with the assessment requirements of the relevant training package and is conducted in accordance with the Principles of Assessment and Rules of Evidence:

### *CPPCPP41419 Certificate IV in Real Estate Practice CPPREP4004 Establish marketing and communication profiles in real estate*

The provider has not evidenced compliance with the principles of validity, reliability and sufficiency under the Principles of Assessment and has not evidenced that assessment records valid or sufficient evidence as required by the Rules of Evidence, as the provider has not demonstrated that each student has been assessed against all assessment requirements outlined in the unit of competency. Specifically:

- Student JG and Student WH completed answers (to questions 13 and 3.1 respectively) do not confirm that assessment judgments are reliable, because the students have not answered the question correctly but have been marked as satisfactory.
- Additionally, whilst the two questions in the assessment tools address the unit of competency's requirement to demonstrate knowledge of a target market analysis, the two completed student answers do not record valid or sufficient evidence of this requirement.
- Student WC does not include the required photo in her answer to question 4.4 but has been marked as satisfactory.
- The CEO acknowledged in discussion at audit that sufficient evidence of competency 'was not there' in the student responses described above.

### *CPP40307 Certificate IV in Property Services*

The provider has not evidenced compliance with the principles of validity, reliability and sufficiency under the Principles of Assessment and has not evidenced that assessment records valid or sufficient evidence as required by the Rules of Evidence, as the provider has not demonstrated that each student has been assessed against all assessment requirements outlined in the unit of competency. Specifically:

The student JC: ID EEQ2535, has been assessed as competent and/or granted RPL for all units of competency but there is insufficient evidence of that she has been assessed against all requirements of the training package. Specifically:

- The student file includes photographic evidence such as marketing material produced by a real estate agency but it is not evident what tasks the student performed in relation to creating the material. For example, for the unit of competency *CPPDSM4014A Market Property for Sale*, the evidence of the student's existing skills and knowledge in the assessment file includes two marketing flyers, neither of which include the student's name or evidence of how the student contributed to marketing activity for the properties.
- Additionally, the photographic evidence does not provide sufficient or valid evidence of competency. For example, the unit *CPPDSM4014A Market Property for Sale* requires evidence that the student demonstrates a variety of skills including communication skills, analytical skills and implements marketing activities. However, the student file does not include a workplace context or detail of the student's role, and, as such, does not demonstrate that the evidence submitted meets the required skills and knowledge or the critical aspects and context of assessment. The photographic evidence therefore does not provide sufficient or valid evidence of competency.
- Similarly, for the unit *CPPDSM4022A Sell and finalise the sale of property by private treaty*, the student's evidence comprises a single commercially produced document that does not include the student's workplace role or detail of the student's employment of this document, and therefore does not record sufficient or valid evidence that the student has demonstrated the unit's required skills and knowledge or met the critical aspects and context of assessment.
- For the unit *CPPDSM4012A List property for sale* the assessment folder includes an Executive Sale Authority form that has not been completed by the student and does not include evidence of how the student contributed to the sales activity. The folder also includes an auction authority

## Evidence analysis

that is signed by the student but does not address many of requirements of this unit. No evidence of assessment of the student's existing skills and knowledge is included.

- *CPPDSM4001A Act as a buyer's agent* requires demonstration of knowledge of insurance, specific legal and consumer protection principles and monitoring settlement of a sale. However, the student file comprises two emails, one from a potential buyer to the student, and one from the student to a potential buyer. This evidence does not address many of the unit's requirements and, as such is not valid or sufficient.
- For the unit *CPPDSM4004A Conduct auction*, the evidence includes a video of an auction. The student is present at the auction but she is not conducting the auction. Therefore, the video does not provide evidence that the student can demonstrate all the required skills and knowledge of the unit. The other piece of evidence for this unit is an auction script that does not evidence the student's competency.
- The evidence provided is also not reliable as there is no indication that the assessor has used the evidence to inform a judgement of competency. The photographic and documentary evidence has not been marked by the assessor or aligned the documentation with the skills and knowledge required by the units of competency.

The evidence does not demonstrate that assessment tools have been implemented in accordance with the instructions so evidence gathered is not reliable, valid or sufficient. Specifically:

- The pathways map for the Student JC stipulates an exam is compulsory for *CPPDSM4006A Establish and manage agency trust accounts*, *CPPDSM4012A List property for sale* and for *CPPDSM4010A Lease property*. The student has completed the exam for *CPPDSM4006A* However, the exams for *CPPDSM4012A* and *CPPDSM4010A* in the same document have not been completed. Nevertheless, the student has been assessed as competent for all three units.
- The third party referee report included in student JC's file comprises include a list of all units of competency in the qualification, with each unit initialled by the learner's workplace supervisor/employer. As such, the third party referee reports do not record sufficient detail of competency and there is no evidence that the assessment practices include trainer/assessor verification with the third party that the candidate is competent in the practical skills and knowledge required by Units.

## Audit finding

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

### *Not compliant*

The provider has not demonstrated students have been assessed against all units of competency requirements and that its assessment tools and practices are consistently implemented so as to ensure the Principles of Assessment and Rules of Evidence for validity, sufficiency and reliability have been met.

## Action required

Provide evidence that demonstrates:

- the provider has corrected its assessment system and practices (including recognition of prior learning) to comply with Clause 1.8) for current and future students and has systems in place to ensure it is this system that is applied. must:
  - demonstrate the provider will implement an assessment system that ensures assessment:
    - complies with the assessment requirements of the relevant training product(s)
    - will be conducted in accordance with the Principles of Assessment and Rules of evidence



### Action required

- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product sampled that were assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action needs to cover current students, students sampled at audit and students who were assessed by the provider in the past one month from 24 February 2021.

### Additional evidence provided in response to audit report

#### Key sources of evidence relevant to findings

*CPPCPP41419 Certificate IV in Real Estate Practice*

*CPPREP4004 Establish marketing and communication profiles in real estate*

- the provider's audit response document
- emails to current students, students sampled at audit and students who were assessed by the provider in the past month from 24 February 2021
- remedial action for students sampled at audit and students who were assessed by the provider in the past month from 24 February 2021:
  - WC Student ID: 20428
  - JG Student ID: 20850
  - AP Student ID not provided
  - DRK Student ID not provided

*CPP40307 Certificate IV in Property Services (Real Estate)*

- the provider's audit response document
- the following evidence of RPL assessment for the student JC: ID EEQ2535:
  - various leasing documentation completed by the student as part of her employment role in the real estate industry, including current employment at Nutrien Harcourts Alexandria
  - confirmation from her current employer that the student performs tasks in her work role at Nutrien Harcourts Alexandria that align with requirements of the following Units:  
*CPPDSM4014A Market Property for Sale*  
*CPPDSM4022A Sell and finalise the sale of property by private treaty*  
*CPPDSM4012A List property for sale*
  - professional referee and record of employment history in real estate industry 2012 – 2021. She has been employed at Nutrien Harcourts Alexandria for 9 years in various roles including property management, administration and sales.
  - role play of an auction by student JC of 77 Caruso Lane Alexandria on behalf of Nutrien Harcourts Alexandria
  - 25 March 2021 gap assessment interview conducted by assessor Cale Morton including requirements of:  
*CPPDSM4014A Market Property for Sale*  
*CPPDSM4022A Sell and finalise the sale of property by private treaty*  
*CPPDSM4012A List property for sale*  
*CPPDSM4006A Establish and manage agency trust accounts*  
*CPPDSM4012A List property for sale*
- 2021-01-06 email from the provider's CEO to ASQA stating that it will cease delivery of *CPP40307 Certificate IV in Property Services (Real Estate)* on 30 August 2021. The training product was superseded in March 2019.
- 2021-05-20 interview with the provider's compliance manager, Ms Jacinta Rowe, who confirmed that the RTO is no longer delivering of *CPP40307 Certificate IV in Property Services (Real Estate)*.
- 2021-05-20 email from RTO to Vision Training Pty Ltd notifying termination of third-party agreement

#### Evidence analysis

*CPP41419 Certificate IV in Real Estate Practice*

*CPPREP4004 Establish marketing and communication profiles in real estate*

A provider must develop and implement a 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.

## Evidence analysis

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.

### *CPP41419 Certificate IV in Real Estate Practice*

The provider has addressed the non-compliance and provided evidence of remedial action for current students and students sampled at audit. Specifically:

### *CPP40307 Certificate IV in Property Services (Real Estate)*

The provider has addressed the non-compliance and provided evidence of remedial action for current students and students sampled at audit. Specifically:

- The provider has provided additional evidence of RPL assessment for the student JG sampled at audit.
- The provider's response states that evidence processes have been emphasised with all assessors to ensure sufficiency requirements have been met. The compliance manager confirmed that it has provided professional development for all RPL assessors and implemented systematic validation of RPL assessments. Also, Ms Rowe confirmed implementation of practices to ensure that RPL assessment meets the requirements of Clause 1.8. All assessment evidence, including RPL assessment evidence is checked and recorded by the RTO's compliance team.

### Remedial action

- Given that *CPP40307* will not be current after October 2021, and that the provider Ms Rowe confirmed on 20 May 2021, that the provider has ceased delivery of the training product, ASQA does not require any further remedial action for this training product.

## Finding following additional evidence

### *CPP41419 Certificate IV in Real Estate Practice*

### *CPP40307 Certificate IV In Property Services (Real Estate)*

### *Compliant*

The provider has demonstrated that students have been assessed against all units of competency requirements and that its assessment tools and practices are consistently implemented so as to ensure the Principles of Assessment and Rules of Evidence for validity, sufficiency and reliability have been met.

## Trainer and assessor competency

### Standards for RTOs - 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 1.13

**Audit Finding: Not compliant**

**Finding following additional evidence: Not compliant**

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

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

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

#### Key sources of evidence relevant to finding

*CPPCPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

- Trainer files for Alex Shang, Patricia, and Janet Moore with details of qualifications and experience
- Testamurs and transcripts demonstrating that Alex Shang and Patricia Rogers hold *CPP41419 Certificate IV in Real estate practice* which is the current vocational qualification from the Construction & Property Services Training Package
- transcripts demonstrating that Jane Moore holds superseded Units of Competency from the Construction & Property Services Training Package
- assessment records for JC Student ID: EEQ2535 third party trainer/assessor Rayda Palma-Parazo (Entry Education)

Interviews held 21 and 28 January 2021:

- Tony Rowe CEO
- Jacinta Rowe Compliance Manager

#### Evidence analysis

The Standards specify that trainers and assessors must maintain vocational competencies at least to the level being assessed.

*CPP41419 Certificate IV in Real estate practice*

The provider has not demonstrated that Janet Moore holds the current vocational qualification to deliver *CPP41419*. Whilst the provider stated in discussion that he is confident that Janet Moore has all the vocational equivalence required because of her extensive experience and industry currency, he acknowledged that evidence was not available at audit to demonstrate this. The CEO agreed that she does not hold the current vocational qualification.

*CPP40307 Certificate IV in Property Services (Real Estate)*

In discussion at audit, the provider advised that Rayda Palma-Parazo, the trainer for Entry Education does not have industry currency. However, Ms Parazo has conducted the assessment for the student JC.

## **Audit finding**

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

### *Not compliant*

The provider has failed to demonstrate that only persons meeting the requirements specified in clause 1.13 deliver training and assessment.

## **Action required**

Provide evidence that demonstrates:

- the provider now has appropriate processes to ensure it only uses trainers/assessors meet the requirements of the standards to provide training and assessment (Clause 1.13)
- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused to students across all scope items that were trained or assessed by a trainer/assessor that did not meet the requirements of the standards. Remedial action needs to cover current students and students who enrolled or completed with your provider in the past one month from 24 February 2021.

## **Additional evidence provided in response to audit report**

### **Key sources of evidence relevant to findings**

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

- provider's response to audit document
- Certificate issued to Janet Moore, CPP41419 Certificate IV in Real Estate Practice, issued by BPG Pty Ltd on 22 March 2021
- Janet Moore: Mapping document from CPP40307 to CPP41419
- Rayda Palma-Parazo: provider's statement that a professional development plan is being developed to ensure Rayda updates industry knowledge to meet the requirements
- 2021-01-06 email from the provider's CEO to ASQA stating that it will cease delivery of *CPP40307 Certificate IV in Property Services (Real Estate)* on 30 August 2021. The training product was superseded in March 2019.

## **Evidence analysis**

The Standards specify that trainers and assessors must maintain vocational competencies at least to the level being assessed.

*CPP41419 Certificate IV in Real Estate Practice*

The provider has demonstrated that Janet Moore now holds the qualification for the training product she has been nominated to deliver and assess.

*CPP40307 Certificate IV in Property Services*

Whilst the provider has outlined plans to ensure Rayda Palmer has the required industry currency, the provider has not provided evidence to demonstrate that Rayda Palma-Parazo has current industry skills directly relevant to the assessment being provided.

## Finding following additional evidence

CPP40307 Certificate IV in Property Services

Not compliant

The provider has failed to demonstrate that only persons meeting the requirements specified in clause 1.13 deliver training and assessment. However, ASQA acknowledges that there is limited impact from the outstanding non-compliance because this qualification was superseded in March 2019 and the provider is currently transitioning and/or finalising all current enrolments.

## Marketing/Recruitment Practices

### Standards for RTOs - Standard 4

**Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients.**

#### Clause 4.1

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes 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;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
  - i) a learner will successfully complete a training product on its scope of registration; or
  - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
  - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

#### Key sources of evidence relevant to finding

CPP41419 Certificate IV in Real Estate Practice

CPP40307 Certificate IV In Property Services (Real Estate)

- Vision Training (third party under written agreement with the RTO) website viewed 2021-02-12  
<https://www.visiontraining.com.au/vic-estate-agent-licence>
- <https://www.visiontraining.com.au/nsw-class-2-agent>

## Evidence analysis

Providers must ensure that students are provided with clear and accurate information regardless of:

- the medium used to advertise training
- how students are recruited, or
- who is actually providing the information.

Marketing material on Vision Training's website is not compliant with Clause 4.1 and does not disseminate accurate information on the RTO's behalf to inform prospective students about its services. Specifically:

- The 'Victorian Estate Agent's License Course' (*CPP40307 Certificate IV in Property Services (Real Estate)*) page does not include the code and title of the training product as published on the national register. Also, the enrolment page has no course codes and titles of the training products. Other course pages on the website also do not include the code and title of the training products as published on the national register.
- Vision Training's website states in its description of 'suitable students' for CPP40307 and CPP41419, 'no requirement on your nationality, VISA status or location of your residence to enrol in the course.' <https://www.visiontraining.com.au/vic-estate-agent-licence>  
This information is not accurate about the services the RTO provides as BPG Pty Ltd is not approved to deliver internationally. It is also misleading for prospective students who are not Australian residents as BPG Pty Ltd is not approved to deliver to international students on student visas.
- Vision Training's 'suitable student' information on the website does not give accurate information taking into account the individual's existing skills and needs, not only in terms of visa status, but also in terms of LL&N requirements to successfully complete AQF Level 4 qualifications: the website only states 'Language, literacy, numeracy'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency they need to have to successfully complete the course.

## Audit finding

*CPP41419 Certificate IV in Real Estate Practice*  
*CPP40307 Certificate IV In Property Services (Real Estate)*

### *Not compliant*

The provider has not demonstrated that it provides clear and accurate information to students prior to enrolment to allow students to make informed decisions.

## Action required

Provide evidence that demonstrates:

- all information, whether disseminated directly by the provider or on its behalf by third parties is now accurate and factual and addresses all of the requirements specified in Standards for RTOs Clause 4.1.
- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused to students who did not receive clear and accurate information prior to enrolment. Remedial action needs to cover current students and students enrolled by the provider in the past one month from 24 February 2021.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

CPP41419 Certificate IV in Real Estate Practice

CPP40307 Certificate IV In Property Services (Real Estate)

- provider's response to audit document including statements that:
  - Vision Training does not have approval to deliver *CPP40307 Certificate IV In Property Services (Real Estate)*.
  - Vision Training has been warned that any further breaches of the terms of their agreement will result in the withdrawal of the third-party agreement.
  - Vision Training has no current enrolments in *CPP40307 Certificate IV In Property Services (Real Estate)*.
- Email from Alex Shang of Vision Training (third party) to Tony Rowe and Jacinta Rowe of BPG Pty Ltd, dated 17 March 2021
- Vision Training (third party under written agreement with the RTO) website viewed 6 May 2021:  
<https://www.visiontraining.com.au/vic-estate-agent-licence>  
<https://www.visiontraining.com.au/nsw-class-2-agent>  
<https://auvisiontraining.teachable.com/p/nsw-assistant-agent-course>
- 2021-05-20 interview with the provider's compliance manager, Ms Jacinta Rowe, who confirmed that the RTO is no longer delivering *CPP40307 Certificate IV in Property Services (Real Estate)*. Ms Rowe also confirmed that Vision Training Pty Ltd is not able to enrol students or issue testamurs on behalf of the RTO for *CPP40307 Certificate IV in Property Services (Real Estate)*. Furthermore, Ms Rowe advised ASQA that the RTO will terminate its third-party agreement with Vision Training Pty Ltd.
- 2021-05-20 email from RTO to Vision Training Pty Ltd notifying termination of third-party agreement.

### Evidence analysis

Providers must ensure that students are provided with clear and accurate information regardless of:

- the medium used to advertise training
- how students are recruited, or
- who is actually providing the information.

Marketing material on Vision Training's website was not compliant with Clause 4.1 and does not disseminate accurate information on the RTO's behalf to inform prospective students about its services. Specifically:

#### 19 May 2021

- As of 19 May 2021, Vision Training's website is currently marketing Vic Estate Agent's License (*CPP40307 Certificate IV in Property Services (Real Estate)*) but the provider has not given approval for the third party to deliver this training product on its behalf.
- The Vic Estate Agent's License (*CPP40307 Certificate IV in Property Services (Real Estate)*) course page on Vision Training's website states in its description of 'suitable students' for CPP40307 and 'no requirement on your nationality, VISA status or location of your residence to enrol in the course.'  
<https://www.visiontraining.com.au/vic-estate-agent-licence>
- The Vic Estate Agent's License (*CPP40307 Certificate IV in Property Services (Real Estate)*) course page 'suitable student' information on the website does not give accurate information taking into account the individual's existing skills and needs, not only in terms of visa status, but also in terms of LL&N requirements to successfully complete AQF Level 4 qualifications: the website only states 'Language, literacy, numeracy'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency they need to have to successfully complete the course
- The 'Vic Estate Agent's License' (*CPP40307 Certificate IV in Property Services (Real Estate)*) page does not include the code and title of the training product as published on the national register. Other course pages on the website also do not include the code and title of the training products as published on the national register.

## Evidence analysis

20 May 2021

The provider has demonstrated that it has addressed the non-compliance:

- The provider terminated the third-party agreement with Vision Training Pty Ltd on 20 May 2021.

### Remedial action:

- While the email from Alex Shang of Vision Training to the provider states that, 'An email has been sent out above updated information to all current and past students and the ones who enrolled within 1 month prior to 24 February 2021', no evidence was provided demonstrating that this has occurred.
- Given that the provider has terminated its agreement for Vision Training to deliver services on its behalf, ASQA does not require any further remedial action for this training product.

## Finding following additional evidence

CPP41419 Certificate IV in Real Estate Practice

CPP40307 Certificate IV In Property Services (Real Estate)

### Compliant

information disseminated by the provider to students prior to enrolment provides clear and accurate information that allows students to make informed decisions.

## Enrolment

### Standards for RTOs - Standard 5

#### Each learner is properly informed and protected.

##### Clause 5.1

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.

#### Key sources of evidence relevant to finding

CPP41419 Certificate IV in Real Estate Practice

CPP40307 Certificate IV in Property Services (Real Estate)

- Vision Training (third party under written agreement with the RTO) website viewed 2021-02-12  
<https://www.visiontraining.com.au/vic-estate-agent-licence>
- <https://www.visiontraining.com.au/nsw-class-2-agent>

## Evidence analysis

Providers must provide clear information to prospective students to enable them to make an informed decision with regards to enrolling in a training product based on their existing skills and knowledge.

The evidence provided does not demonstrate that advice is provided to prospective students about the training products appropriate to meeting their needs. Specifically:

- Vision Training's 'suitable student' information on the website does not give accurate information taking into account the individual's existing skills and needs, not only in terms of visa status, but also in terms of LL&N requirements to successfully complete AQF Level 4 qualifications: the website only states 'Language, literacy, numeracy'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency they need to have to successfully complete the course.



## Evidence analysis

- Vision Training's 'suitable student' information on the website does not give accurate information taking into account the individual's existing skills and needs, not only in terms of visa status, but also in terms of LL&N requirements to successfully complete AQF Level 4 qualifications: the website only states 'Language, literacy, numeracy'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency they need to have to successfully complete the course.
- The length of course information for Victorian Estate Agent's License Course, states that a student spends 40-60 hours to complete assessments which is potentially misleading for students who may take longer to complete assessments for 21 units of competency. Other course pages publish similarly short durations for assessment.

## Audit finding

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

### Not Compliant

The evidence provided does not demonstrate that advice is provided to prospective students about the training products appropriate to meeting their needs.

## Action required

Provide evidence that demonstrates:

- the provider now has appropriate systems that are followed to ensure new learners are enrolled into an appropriate training product, considering their existing knowledge, experience and skills that complies with Standards for RTOs Clause 5.1.
- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused to students who did not receive appropriate advice, considering their existing knowledge, experience and skills that complies with Standards for RTOs Clause 5.1 prior to enrolment. Remedial action needs to cover current students and students enrolled by the provider in the past one month from 24 February 2021.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

- provider response to audit document
- Email from Alex Shang of Vision Training (third party) to Tony Rowe and Jacinta Rowe of BPG Pty Ltd, dated 17 March 2021
- Vision Training (third party under written agreement with the provider) website viewed 6 May 2021  
<https://www.visiontraining.com.au/vic-estate-agent-licence>  
<https://www.visiontraining.com.au/nsw-class-2-agent>  
<https://auvisiontraining.teachable.com/p/nsw-assistant-agent-course>
- 2021-05-20 interview with the provider's compliance manager, Ms Jacinta Rowe, who confirmed that the provider is no longer delivering *CPP40307 Certificate IV in Property Services (Real Estate)*. Ms Rowe also confirmed that Vision Training Pty Ltd is not able to enrol students or issue testamurs on behalf of the RTO for *CPP40307 Certificate IV in Property Services (Real Estate)*. Furthermore, Ms Rowe advised ASQA that the RTO will terminate its third-party agreement with Vision Training Pty Ltd.
- 2021-05-20 email from the provider to Vision Training Pty Ltd notifying termination of third-party agreement.

## Evidence analysis

Providers must provide clear information to prospective students to enable them to make an informed decision with regards to enrolling in a training product based on their existing skills and knowledge.

The evidence provided did not demonstrate that advice was provided to prospective students about the training products appropriate to meeting their needs. Specifically:

- The email from Alex Shang of Vision Training to the provider states that the following wording has been added to the website, 'Participants are required to provide a Language, Literacy and Numeracy (LLN) & Digital Literacy evidence as a Government requirement. The purpose of this is to check your readiness and suitability for the course. We will send you the LLN test once you submit registration form. You may also preview the LLN test from this link'. However, no such statement could be located on the website. The website only states 'Language test'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency is required to successfully complete the course.

### 20 May 2021

The provider has demonstrated that it has addressed the non-compliance:

- The provider terminated the third-party agreement with Vision Training Pty Ltd on 20 May 2021.

### Remedial action:

- While the email from Alex Shang of Vision Training to the provider states that, 'An email has been sent out above updated information to all current and past students and the ones who enrolled within 1 month prior to 24 February 2021', no evidence was provided demonstrating that this has occurred.
- Given that the provider has terminated its agreement for Vision Training to deliver services on its behalf, ASQA does not require any further remedial action for this training product

## Finding following additional evidence

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

### *Compliant*

The evidence provided demonstrates that advice provided to prospective students about the training products is appropriate to meeting their needs.

## Standards for RTOs - Standard 5

### Each learner is properly informed and protected.

#### Clause 5.2

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:
  - i) estimated duration;
  - ii) expected locations at which it will be provided;
  - iii) expected modes of delivery;
  - iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and
  - v) any work placement arrangements.
- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.
- d) the learner's rights, including:
  - i) details of the RTO's complaints and appeals process required by Standard 6; and
  - ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;
- e) the learner's obligations:
  - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;
  - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and
  - iii) any materials and equipment that the learner must provide; and
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

#### **Key sources of evidence relevant to finding**

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

- Vision Training (third party under written agreement with the RTO) website viewed 2021-02-12  
<https://www.visiontraining.com.au/vic-estate-agent-licence>
- <https://www.visiontraining.com.au/nsw-class-2-agent>

## Evidence analysis

Providers are required to provide clear information to prospective students to enable them to make an informed decision about undertaking training.

The provider has not demonstrated that prospective students will be provided with clear and accurate information which will allow prospective students to make an informed decision. Specifically:

- Vision Training's website does not include the code and title of the training products as published on the national register; the enrolment page has no course codes and titles of the training products. Other course pages on the website also do not include the code and title of the training product as published on the national register and it is not possible for the prospective learner to identify accredited training.
- The length of course information for 'Victorian Estate Agent's License Course' (*CPP40307 Certificate IV in Property Services (Real Estate)*) states that a student spends 40-60 hours to complete assessments which is potentially misleading for students who may take longer to complete assessments for 21 units of competency. Other course pages publish similarly short durations for assessment.

## Audit finding

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

*Not compliant*

The provider has not demonstrated that it provides accurate or clear information to students.

## Action required

Provide evidence that demonstrates:

- the provider now has appropriate systems that are followed to ensure each learner is provided with accurate information to enable them to make an informed decision about undertaking training with the provider that complies with Standards for RTOs Clause 5.2.
- the provider has carried out remedial action to identify and address the impact the non-compliance may have caused to students who did not receive clear and accurate information, that complies with Standards for RTOs Clause 5.2 prior to enrolment, which would allow prospective students to make an informed decision about undertaking training with the provider. Remedial action needs to cover current students and students enrolled by the provider in the past one month from 24 February 2021.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV In Property Services (Real Estate)*

- provider's response to audit document including statements that:
  - Vision Training does not have approval to deliver *CPP40307 Certificate IV In Property Services (Real Estate)*.
  - Vision Training has been warned that any further breaches of the terms of their agreement will result in the withdrawal of the third-party agreement.
  - Vision Training has no current enrolments in *CPP40307 Certificate IV In Property Services (Real Estate)*.
- Email from Alex Shang of Vision Training (third party) to Tony Rowe and Jacinta Rowe of BPG Pty Ltd, dated 17 March 2021
- Vision Training (third party under written agreement with the RTO) website viewed 6 May 2021  
<https://www.visiontraining.com.au/vic-estate-agent-licence>  
<https://www.visiontraining.com.au/nsw-class-2-agent>

## Key sources of evidence relevant to findings

<https://auvisiontraining.teachable.com/p/nsw-assistant-agent-course>

- 2021-05-20 interview with the provider's compliance manager, Ms Jacinta Rowe, who confirmed that the RTO is no longer delivering *CPP40307 Certificate IV in Property Services (Real Estate)*. Ms Rowe also confirmed that Vision Training Pty Ltd is not able to enrol students or issue testamurs on behalf of the RTO for *CPP40307 Certificate IV in Property Services (Real Estate)*. Furthermore, Ms Rowe advised ASQA that the RTO will terminate its third-party agreement with Vision Training Pty Ltd.
- 2021-05-20 email from the provider to Vision Training Pty Ltd notifying Alex Shang of the termination of the third-party agreement.

## Evidence analysis

Providers are required to provide clear information to prospective students to enable them to make an informed decision about undertaking training.

The provider has not demonstrated that information provided on the RTOs behalf by Vision Training Pty Ltd to prospective students is clear and accurate information which will allow prospective students to make an informed decision. Specifically:

- Vision Training's website is currently marketing Vic Estate Agent's License (CPP40307 Certificate IV in Property Services (Real Estate)) but the provider has not given approval for the third party to deliver this training product on its behalf.

### 20 May 2021

The provider has demonstrated that it has addressed the non-compliance because:

- the provider terminated the third-party agreement with Vision Training Pty Ltd on 20 May 2021.

### Remedial action:

- While the email from Alex Shang of Vision Training to the provider states that, 'An email has been sent out above updated information to all current and past students and the ones who enrolled within 1 month prior to 24 February 2021', no evidence was provided demonstrating that this has occurred.
- Given that the provider has terminated its agreement for Vision Training to deliver services on its behalf, ASQA does not require any further remedial action for this training product.

## Finding following additional evidence

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

### *Compliant*

- The evidence provided demonstrates that provider now has appropriate systems that are followed to ensure each learner is provided with accurate information to enable them to make an informed decision about undertaking training with the provider that complies with Standards for RTOs Clause 5.2.

## Finding following additional evidence

### Completion

#### Standards for RTOs - Standard 3

The RTO issues, maintains and accepts AQF certification documentation in accordance with these Standards and provides access to learner records.

#### Clause 3.1

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.

#### Key sources of evidence relevant to finding

*CPP40307 Certificate IV in Property Services*

*CPPREP4004 Establish marketing and communication profiles in real estate*

- Assessments and testamurs for students:
  - WC Student ID: 20428 testamur issued 2 July 2020
  - JG Student ID: 20856 testamur issued 18 November 2020.

*CPP40307 Certificate IV in Property Services*

- JC Student ID: EEQ2535 assessments and testamur issued 8 December 2020

Interviews held 21 and 28 January 2021:

- Tony Rowe CEO
- Jacinta Rowe Compliance Manager.

#### Evidence analysis

*CPP40307 Certificate IV in Property Services*

*CPPCPP41419 Certificate IV in Real Estate Practice*

Providers must have controls in place to ensure that qualifications, statements of attainment and records of results are not issued unless the student has successfully completed all assessment requirements. Providers should have systems in place to ensure that:

- certification is only issued to students who have fully demonstrated competence in all training product requirements
- evidence of this can be demonstrated.

The provider has recorded students are competent and/or issued AQF certification to students when there is insufficient evidence to confirm the students were eligible to receive certification. Specifically:

- A review of the completed assessment instruments for students sampled for the purposes of Clause 1.8 found that assessments were deficient in relation to validity, sufficiency and reliability.

#### Audit finding

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services*

#### Not compliant

The provider has not demonstrated that AQF certification documentation is only issued to a student whom it has assessed as meeting the requirements of the training product as specified in the relevant training package.

## Action required

Provide evidence that demonstrates the provider:

- now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course
- has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled that were issued with AQF certification documentation and were not assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course. Remedial action needs to cover students issued with AQF certification in the past one month from 24 February 2021.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services*

- provider response to audit document
- reassessment of students sampled at audit and of current students, as detailed under Clause 1.8
- 2021-05-20 interview with the provider's compliance manager, Ms Jacinta Rowe, who confirmed that the RTO has implemented systematic validation of RPL assessments and an updated RPL evidence retention and verification procedure.

### Evidence analysis

Providers must have controls in place to ensure that qualifications, statements of attainment and records of results are not issued unless the student has successfully completed all assessment requirements.

Providers should have systems in place to ensure that:

- certification is only issued to students who have fully demonstrated competence in all training product requirements
- evidence of this can be demonstrated.
- Ms Rowe confirmed that the provider has implemented systems to ensure assessments are validated and assessment results are verified to ensure students have fully demonstrated competence in all training product requirements.

### Remedial action

- Reassessment evidence confirmed that the provider has taken adequate remedial action that demonstrates that students sampled at audit and current students have been assessed as meeting the requirements of the training product as specified in the relevant training or VET accredited course.

### Finding following additional evidence

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services*

#### *Compliant*

The provider has demonstrated that AQF certification documentation is only issued to a student whom it has assessed as meeting the requirements of the training product as specified in the relevant training package.

## Regulatory Compliance / Governance

### Third Parties (including education agents)

#### Standards for RTOs - Standard 2

The operations of the RTO are quality assured.

#### Clause 2.4

**Audit Finding: Not compliant**

**Finding following additional evidence: compliant**

The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and use these to ensure that the services delivered comply with these Standards at all times.

#### Key sources of evidence relevant to finding

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services*

- 15 May 2020 review of the provider's eight current third parties' websites conducted by Jacinta Rowe
- August 2020 review of Entry Education's website conducted by Jacinta Rowe records evidence of monitoring third parties marketing materials, enrolment and training practices and resources as well as trainer/assessors' qualifications to deliver *CPP41419 Certificate IV in Real Estate Practice*
- 31 December 2020 review of the provider's eight current third parties' websites conducted by Jacinta Rowe, identifying monitoring of compliance with relevant standards in August 2020 and again in December 2020. The December review evidences that the provider has checked that many issues previously identified in August 2020 have been addressed.
- Vision Training (third party under written agreement with the RTO) website viewed 2021-02-12  
<https://www.visiontraining.com.au/vic-estate-agent-licence>  
<https://www.visiontraining.com.au/nsw-class-2-agent>
- Completed student assessment records for:
  - WC Student ID: 20428
  - JG Student ID: 20856
  - OH Student ID: 20716
  - CDM Student ID: 20848
  - JC Student ID: EEQ2535
- December 2020 Jacinta Rowe's review of services delivered by Entry Education, including follow up on previously identified non-compliances from April and August 2020.

Interviews held 21 and 28 January 2021:

- Tony Rowe CEO
- Jacinta Rowe Compliance Manager.

#### Evidence analysis

RTO's are responsible for ensuring that all services delivered under its registration by third parties comply with The Standards at all times. This responsibility applies to all obligations as an RTO, including:

- complying with advertising and marketing standards
- informing prospective students
- training and assessing students

The provider has demonstrated that it has reviewed its third parties' websites on a regular basis in May 2020, August 2020 and December 2020. The review conducted in December 2020 demonstrates that the provider ensured that the third parties addressed many of the compliance issues that were identified in August 2020. However, it is not evident that the provider has adequately ensured that all issues identified in May 2020 were adequately addressed. Specifically:

- Marketing material on Vision Training's website is not compliant with Standards. The Victorian Estate Agent's License Course page does not include the code and title of the training product as published



## Evidence analysis

on the national register; the enrolment page has no course codes and titles of the training products. The length of course information for Victorian Estate Agent's License Course, states that a student spends 40-60 hours to complete assessments which is potentially misleading for students who may take longer to complete assessments for 21 units of competency. Other course pages publish similarly short durations for assessment.

- Under 'types of questions in the assessment,' Vision Training states that '70% to 80% answers can be found in the learner's guide,' which suggests that assessment practices may not meet the requirements of Clause 1.8.

- Vision Training's website states in its description of 'suitable students' for CPP40307, 'no requirement on your nationality, VISA status or location of your residence to enrol in the course.' <https://www.visiontraining.com.au/vic-estate-agent-licence>

This information is not accurate about the services the RTO provides as BPG Pty Ltd is not approved to deliver internationally. It is also misleading for prospective students who are not Australian residents as BPG Pty Ltd is not approved to deliver to international students on student visas.

Vision Training's 'suitable student' information on the website does not give accurate information taking into account the individual's existing skills and needs, not only in terms of visa status, but also in terms of LL&N requirements to successfully complete AQF Level 4 qualifications: the website only states 'Language, literacy, numeracy'. This does not explain to prospective learners what level of language, literacy and numeracy proficiency they need to have to successfully complete the course.

- Whilst the RTO provided evidence of monitoring of third party websites, including Vision Training in May and December 2020, it is not evidenced that that the monitoring is effective as third party marketing material and practices continue to be non-compliant with The Standards.

In discussion at audit of non-compliance identified with assessment practices, the provider confirmed that it had not adequately monitored assessments or conducted relevant assessment validation. The provider advised that it intends to address these gaps in practices and to conduct assessment validation. Entry Education, Real Mastery Consulting and Arthur Chrisimos did not deliver assessment on behalf of the RTO that met the requirements of Clause 1.8.

## Audit finding

Not compliant

The RTO has not ensured that services provided on its behalf comply with these Standards at all times.

## Action required

Provide evidence that demonstrates the provider:

- now has appropriate systems that are followed to ensure that services provided on its behalf comply with these Standards at all times.
- has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled who received services from third parties that did not meet the requirements of the Standards. Remedial action needs to cover students trained and assessed by third parties in the provider in the past one month from 24 February 2021.

## Additional evidence provided in response to audit report

### Key sources of evidence relevant to findings

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

- provider response to audit document
- 2021-05-20 interview and supporting documentation from the provider's compliance manager, Ms Jacinta Rowe, who confirmed implementation of the following quality assurance processes and practices:
  - Compliance manager Samantha Rich is reviewing and streamlining administrative systems and processes to ensure compliance with The Standards
  - systematic validation of RPL assessments
  - RPL assessment professional development for all trainers and assessors, including third party assessors
  - quarterly validation sessions mandatory for all assessors, including third party assessors
  - confirmation that the provider is no longer enrolling students in *CPP40307 Certificate IV in Property Services (Real Estate)*
  - transition arrangements for students still enrolled in *CPP40307 Certificate IV in Property Services (Real Estate)*
- 2021-05-20 updated RPL procedure
- 2021-05-20 email from the provider to Vision Training Pty Ltd notifying Alex Shang of the termination of the third-party agreement.

### Evidence analysis

RTO's are responsible for ensuring that all services delivered under its registration by third parties comply with The Standards at all times. This responsibility applies to all obligations as an RTO, including:

- complying with advertising and marketing standards
- informing prospective students
- training and assessing students

The provider has demonstrated that it has implemented strategies and resources to systematically monitor assessment services delivered on its behalf. Specifically:

- the CEO terminated its third-party agreement with Vision Training Pty Ltd due to the third party's noncompliance with The Standards.

### Finding following additional evidence

*CPP41419 Certificate IV in Real Estate Practice*

*CPP40307 Certificate IV in Property Services (Real Estate)*

*Compliant*

The RTO has ensured that services provided on its behalf comply with these Standards at all times.