



Australian Government

Australian Skills Quality Authority

REPORT

Audit report: Cedar Centre Ltd

RTO number:	5987
CRICOS number:	N/A
Date/s of audit:	03 Dec 2019 - 04 Dec 2019
Date report created:	5 December 2019
Date report updated:	21/01/2020

Organisation details

Organisation's legal name:	Cedar Centre Ltd
Trading name/s:	Cedar Centre Ltd Cedar Center LTD
RTO number:	5987
CRICOS number:	N/A

Audit team

Lead auditor:	Judith Keller
Auditor/s:	N/A

Audit details

Application number/s:	N/A
Audit number:	AUDREC0009977
Audit reason:	Compliance Monitoring
Address of site visited:	57 Brook St Toowoomba QLD 4350 Australia
Dates of audit:	03 Dec 2019 - 04 Dec 2019
Organisation's contact for audit:	David Wallis Chair of Board mark@cedarcentre.com.au 07 4512 6770

Original finding at time of audit

Audit finding: Critical non-compliance

Report completed by: Judith Keller

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1*	Not compliant
Enrolment	5.1, 5.2*, 5.3	Not compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.1, 1.2, 1.3, 1.8*, 1.13, 1.14, 1.16	Not compliant
Completion	3.1*	Not compliant

*Indicates a non-compliant clause

Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 17/01/2020 & 20/01/2020:
Critical non-compliance

Report completed by: Judith Keller

Practice	Standards for RTOs	Finding
Marketing/Recruitment Practices	4.1*	Not compliant
Enrolment	5.2	Compliant
Training and Assessment	1.8*	Not compliant
Completion	3.1*	Not compliant

*Indicates a non-compliant clause

Background

Summary of organisation and management structure:

- Registered Training Organisation initial registration date: 1 January 1998
- End date of current registration period: 23 June 2024
- The Cedar Centre is a community based education centre that has been providing access to community education and learning opportunities within the Toowoomba community for over 40 years. The organisation was previously known as the Toowoomba Education Centre. The registered training organisation offers a range of training products from Certificate I through to Diploma level qualifications in industry areas that include aged care, disability, early childhood, education support, community services, mental health, business, foundation skills and hospitality. The Cedar Centre also offers a range of non-accredited corporate and short courses that have been developed in consultation with industry experts.
- Cedar Centre Ltd's Board of Management is comprised of five members. The organisation employs approximately 20 staff.
- Mr David Wallis, Chair of the Cedar Centre Board of Management, is the primary contact for the registered training organisation at present, following the recent departure of the organisation's former Chief Executive Officer. Ms Pujitha Nuthakki, Compliance Manager, is responsible for the day to day operations of the registered training organisation.

Scope of organisation's registration:

- BSB10115 Certificate I in Business
- BSB20115 Certificate II in Business
- BSB30415 Certificate III in Business Administration
- CHC30113 Certificate III in Early Childhood Education and Care
- CHC30213 Certificate III in Education Support
- CHC32015 Certificate III in Community Services
- CHC40213 Certificate IV in Education Support
- CHC43115 Certificate IV in Disability
- CHC43315 Certificate IV in Mental Health
- CHC50113 Diploma of Early Childhood Education and Care
- CHC52015 Diploma of Community Services
- FSK20113 Certificate II in Skills for Work and Vocational Pathways
- SIT10216 Certificate I in Hospitality
- SIT20316 Certificate II in Hospitality
- SIT30616 Certificate III in Hospitality

Suburb and state of all delivery sites:

- Chinchilla, Dalby, Springfield, Toowoomba and Warwick in Queensland

Third party usage:

- Nil

Core clients/target groups:

- Trainees
- Unskilled job seekers
- Skilled workers
- School-based

Training Revenue (Funded or fee for service):

- Funded - Queensland Certificate III Guarantee, Higher Level Skills and User Choice funding
- Fee for service

Total number of current enrolments in the organisation as at audit date:

- 291

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 Cedar Centre Ltd to ASQA.
- Existing information and records held by ASQA concerning Cedar Centre Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Cedar Centre Ltd conducted on 03 Dec 2019 - 04 Dec 2019.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.

Audit Sample

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>CHC30113 Certificate III in Early Childhood Education and Care</i>	Face to face, workplace, distance, online	10
<i>CHC33015 Certificate III in Individual Support</i>	Face to face, workplace, distance, online	76
<i>CHC43115 Certificate IV in Disability</i>	Face to face, workplace, distance, online	6
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Face to face, workplace, distance, online	24
<i>CHC52015 Diploma of Community Services</i>	Face to face, workplace, distance, online	23
<i>SIT30616 Certificate III in Hospitality</i>	Face to face, workplace, distance, online	6

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

Interviewees

Name	Position	Training products
David Wallis	Chair of Board	N/A
Pujitha Nuthakki	Compliance Manager	N/A
Denise Patterson	Trainer/Assessor	CHC30113, CHC50113

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

Original action required by Organisation

Cedar Centre Ltd did not meet all requirements for the following:

Standards for RTOs: Clauses 1.8, 3.1, 4.1 and 5.2

Remedial action is required for the following training products:

- *CHC30113 Certificate III in Early Childhood Education and Care*
- *CHC50113 Diploma of Early Childhood Education and Care*

The organisation is required to provide evidence that demonstrates:

Marketing and recruitment

Standards for RTOs Clause 4.1

- all information, whether disseminated directly by the organisation 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*.

Enrolment

Standards for RTOs Clause 5.2

- the organisation now has appropriate systems that are consistently followed to ensure that prior to enrolment or the commencement of training and assessment, whichever comes first, each and every learner is provided with all of the information specified in *Standards for RTOs Clause 5.2*.

Training and assessment

Standards for RTOs Clause 1.8

- the organisation has corrected its assessment system (to comply with Clause 1.8) for future students and has systems in place to ensure it is this system that is applied. The evidence to be provided must:
 - demonstrate the organisation implements an assessment system that ensures assessment:
 - complies with the assessment requirements of the relevant training product; and
 - is conducted in accordance with the principles of assessment and rules of evidence.
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to identified students RB and RL that were assessed in a manner that did not meet the requirements of Clause 1.8. Remedial action also needs to cover any other students enrolled in *CHC30113 Certificate III in Early Childhood Education and Care* and/or *CHC50113 Diploma of Early Childhood Education and Care* who were assessed by your

organisation in the past six months, where assessment did not meet the requirements of Clause 1.8.

Completion

Standards for RTOs Clause 3.1

- the organisation now has appropriate systems that are followed to ensure AQF certification documentation is only issued to a learner whom it has assessed as meeting all of the requirements of the training product as specified in the relevant training package.
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to identified student RL who was issued with AQF certification documentation (specifically, *CHC30113 Certificate III in Early Childhood Education and Care*) and was not assessed as meeting all of the requirements of the training product as specified in the relevant training package. Remedial action needs to cover any and all other students to whom your organisation has issued AQF certification documentation within the past 6 months who were not assessed as meeting all of the requirements of the relevant training product as specified in the relevant training package.

Audit finding following analysis of additional evidence

Following analysis of additional evidence provided by Cedar Centre Ltd on 17/01/2020 & 20/01/2020 the organisation:

- provided sufficient evidence to demonstrate compliance with:
Standards for RTOs: Clause 5.2
- remains not compliant with:
Standards for RTOs: Clauses 1.8, 3.1 and 4.1.

Refer to analysis of additional evidence detailed under each clause in this report for further information.

Areas of non-compliance

Marketing/Recruitment Practices

Standards for RTOs Clause 4.1

Original Finding: Not compliant

Finding following additional evidence: Not 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.

- o The following evidence was reviewed:
 - o Cedar Centre website <http://www.cedarcentre.com.au/>
 - o Facebook site - <https://www.facebook.com/cedarcentretoowoomba/>
 - o Course outlines provided for sampled training products
 - o Course Guide (MK027 V4)
 - o SIT30616 Course Guide Clubhouse (version 1.0)
 - o Training and assessment strategy documents provided by the RTO for sampled training products
 - o Discussion with RTO representatives during the site audit.
- o The organisation's marketing material does not align with other documented information it has produced. For example, but not limited to:
 - o The Course Outline document provided by Cedar Centre Ltd for the qualification *CHC52015 Diploma of Community Services* was found to list an elective unit (*CHCCSL007*) which was not included in the organisation's documented training and assessment strategy for the qualification. During discussions at audit, RTO representatives advised that they may offer

this unit in future, but that it is not part of the organisation's current elective unit offerings for which the RTO is fully resourced for training and assessment purposes.

- The organisation's marketing material does not contain the required unit codes and/or unit title information relevant to the training products being promoted and in accordance with the requirements of Clause 4.1. For example, but not limited to:
 - The Course Outline document provided by Cedar Centre Ltd for the qualification *CHC43115 Certificate IV in Disability* was found to contain a unit title for elective unit *CHCCCS007* that is not consistent with the unit title in the CHC training package.
 - Review of the RTO's 'SIT30616 Course Guide Clubhouse' found that it contained incorrect unit codes for two units of competency offered by the RTO as part of *SIT30616 Certificate III in Hospitality*.

Analysis of additional evidence

- The following additional evidence was reviewed:
 - Cedar Centre Rectification Response v1.3.docx
 - CHC52015 Diploma of Community Services Course Outline V2.docx
 - CHC43115 Certificate IV in Disability Course Outline 2019 V1.3.docx
 - SIT30616 Course Guide Clubhouse.docx
 - Marketing Review Schedule.docx
 - Marketing Compliance Checklist.docx.
- The organisation has not fully addressed the non-compliance.
- The organisation's marketing material does not contain the correct and current unit codes for all training products being promoted and in accordance with the requirements of Clause 4.1. Specifically:
 - Review of the RTO's 'SIT30616 Course Guide Clubhouse' found that it contained an incorrect unit code on page 2 for unit of competency 'Process financial transactions' offered by the RTO as part of *SIT30616 Certificate III in Hospitality*. On page 2 the unit code has been identified as 'STIXFIN201'. However, the correct unit code is 'SITXFIN001' as stated on page 4 in the same document.

Enrolment

Standards for RTOs Clause 5.2

*Original 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.

- o The following evidence was reviewed:
 - o Enrolment documentation for sampled students
 - o Assessment documentation for sampled students
 - o Discussion with RTO representatives during the site audit regarding the organisation's enrolment processes.
- o The organisation has not demonstrated that it has a reliable system in place that ensures that all learners are consistently provided with all of the information specified in Clause 5.2 prior to enrolment or the commencement of training and assessment (whichever comes first). For example:
 - o Review of the RTO's records for Learner LB (enrolled in *SIT30616 Certificate III in Hospitality*) found:
 - Wisenet record indicating that the student enrolled on 16 April 2019
 - completed assessment for unit *SITXWHS001* recording a commencement date of 29 April 2019 and satisfactory completion of Assessment Task 2 Major Activity on 29 April 2019
 - an enrolment form signed by the student and dated 7 May 2019
 - email stating that the student would attend induction on 7 May 2019
 - induction checklist signed and dated 7 May 2019.

Dates on the documentation provided at audit indicate that Learner LB engaged in assessment on a date prior to completing the RTO's enrolment form and induction checklist acknowledging that they had received all of the information specified in Clause 5.2. No additional evidence was able to be provided by the organisation at audit to confirm that prior to the commencement of training and assessment, the RTO provided to Learner LB, in print or through referral to an electronic copy, current and accurate information (which included at a minimum all of the content specified in Clause 5.2) to enable the learner to make an informed decision about undertaking training with the RTO.

Analysis of additional evidence

- o The following additional evidence was reviewed:
 - o Cedar Centre Rectification Response v1.3.docx
 - o Email – Enrolment and proof of enrolment
 - o Email – Induction for Club house students (1)
 - o Email – Induction for Club house students (2)
 - o (Supporting evidence 4) Assessment Cover Sheet.pdf

- Enrolment Procedures V1.3.docx
- Enrolment Checklist.docx
- Participant handbook (accessed 20 January 20 from weblink at <http://www.cedarcentre.com.au/qualifications.html>)
- Web pages (viewed 20 January 20):
 - <http://www.cedarcentre.com.au/qualifications.html>
 - <http://www.cedarcentre.com.au/policies--forms.html>
 - <http://www.cedarcentre.com.au/funding--eligibility.html>.
- The organisation has addressed the non-compliance for future students.

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.8

Original Finding: *Not compliant*

Finding following additional evidence: *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.

Table 1.8.1 Principles of Assessment

Fairness	<p>The individual learner's needs are considered in the assessment process.</p> <p>Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs.</p> <p>The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.</p>
Flexibility	<p>Assessment is flexible to the individual learner by:</p> <ul style="list-style-type: none"> • reflecting the learner's needs; • assessing competencies held by the learner no matter how or where they have been acquired; and • drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	<p>Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner.</p> <p>Validity requires:</p> <ul style="list-style-type: none"> • assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance; • assessment of knowledge and skills is integrated with their practical application; • assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and • judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	<p>Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.</p>

Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

CHC30113 Certificate III in Early Childhood Education and Care

- The following evidence was reviewed:
 - Completed student assessment items (and the assessment tools used):
 - CHCECE004 Promote and provide healthy food and drinks*
 - Assessment guide comprising:
 - Assessment Task 1 – Short answer activities
 - Assessment Task 2
 - Assessment Task 3 – Work placement task book
 - Marking guide
 - Learner RB (sample student 2)
 - Assessment Task 1 – short answer activities
 - Assessment Task 2 - no assessment evidence provided for this task
 - Assessment Task 3 – Work placement task book.
 - Learner RL (sample student 4)
 - Work placement task book
 - Assessment Task 2 - short answer activities
 - Assessment Task 3 – skill and knowledge activity
 - Assessment Task 4.
 - CHCECE005 Provide care for babies and toddlers*
 - Assessment guide comprising:
 - Assessment Task 1 – Short answer activities
 - Assessment Task 2 – Major activity research project
 - Assessment Task 3 – Work placement task book
 - Marking guide
 - Learner AF (sample student 3)
 - Assessment Task 1 – Short answer activities
 - Assessment Task 2 – Major activity research project
 - Assessment Task 3 – Work placement task book
 - Learner RL (sample student 4)
 - Completed assessment guide
 - 'Supplementary/Alternative Evidence Document' dated 6/8/19.
 - Discussion with the RTO's Compliance Manager and Trainer/Assessor for the above training product.
- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliance are provided however, this is not an exhaustive list. It is the organisation's responsibility to review implementation of the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
 - that confirms students were assessed as meeting all the requirements of the training product in which they were enrolled.

- The assessment practices for the following students do not confirm the organisation conducted adequate assessment of the students that ensured they were competent against all requirements of the training product and that the assessment was conducted in accordance with the Rules of Evidence. For example, but not limited to:
 - Learner RB (sample student 2):
 - No evidence was provided at audit to support that the learner had completed Assessment Task 2 for unit *CHCECE004 Promote and provide healthy food and drinks*. As Assessment Task 2 is a component of the organisation's assessment system designed to ensure that all unit requirements are addressed through the assessment process, it could not be confirmed that for Learner RB sufficient evidence (ref: rules of evidence - sufficiency) had been collected to ensure that the student was competent against all requirements of the training product.
 - Learner RL (sample student 4)
 - Review of the assessment evidence provided for Learner RL for unit *CHCECE005 Provide care for babies and toddlers* failed to confirm that all evidence presented for assessment was the learner's own work (ref: rules of evidence - authenticity) - see below for further details. Hence, it could not be confirmed that the organisation conducted adequate assessment of Learner RL that confirmed the learner was competent against all requirements of the training product.
- Authenticity - the evidence provided does not confirm the authenticity of the student's own work. For example, but not limited to:
 - Review of the assessment evidence provided for Learner RL for unit *CHCECE005 Provide care for babies and toddlers* found that the all of the responses/answers contained in the completed assessment guide were a verbatim copy of the RTO's Marking Guide responses for the assessment tasks. In addition, the cover page of Learner RL's assessment contained the name of another (former) student in the 'participant signature' box. These findings were discussed with the RTO's Compliance Manager and the student's trainer/assessor during the site audit; however, no additional evidence was able to be provided by the organisation to confirm the authenticity of the assessment evidence submitted for Learner RL for unit *CHCECE005 Provide care for babies and toddlers*.

Analysis of additional evidence

CHC30113 Certificate III in Early Childhood Education and Care

- The following additional evidence was reviewed:
 - Cedar Centre Rectification Response v1.3.docx
 - Validation Calendar.xlsx
 - Misconduct letter dated 7 January 2020
 - Remedial action evidence:
 - CHCECE004 Promote and provide healthy food and drinks*
 - CHCECE004 – Resubmission notice
 - Copy of 'Resubmission' email sent to Learner RB, dated 17 January 2020
 - CHCECE005 Provide care for babies and toddlers*
 - CHCECE005 – Resubmission notice
 - Copy of 'Resubmission' email sent to Learner RL, dated 17 January 2020
 - Copy of 'Resubmission' email sent to Learner KW, dated 17 January 2020
 - RB Doc.pdf
 - 2213_001 (Trainee Visit Form for Student RB dated 6/8/19)
 - 20190905081558587 (CHCECE005 Workplace Activity Form)
 - 201909050815585871 (CHCECE005 Workplace Activity Form).

- The organisation has addressed the non-compliance for future students.
- The organisation has identified the impact the non-compliance may have caused current/former students and has commenced undertaking remedial action with respect to three individuals identified as being impacted by the non-compliance. The RTO's response indicates that it anticipates completing remedial action activities (namely, reassessment) in relation to the impacted current/former students during February 2020.

Due to the outstanding remedial action required, the provider remains non-compliant with Clause 1.8 as at 21 January 2020.

Completion

Standards for RTOs Clause 3.1

Original Finding: *Not compliant*

Finding following additional evidence: *Not 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.

- The following evidence was reviewed:
 - Completed 'Certificate Issuance Authority Forms' for sampled learners
 - 'Completion Reports' for sampled learners
 - Completed assessments for sampled learners - see Clause 1.8.
- The organisation has not demonstrated that its assessment system complies with the Rules of Evidence (refer to non-compliance identified with Clause 1.8) with respect to some students who were assessed as meeting the requirements of the training product and were issued with AQF certification documentation. For example, but not limited to:
 - Learner RL, issued the qualification *CHC30113 Certificate III in Early Childhood Education and Care* on 27 September 2019.

Analysis of additional evidence

- The following additional evidence was reviewed:
 - Cedar Centre Rectification Response v1.3.docx
 - Evidence as for Clause 1.8.
- The organisation has addressed the non-compliance for future students.
- The organisation has not evidenced that it has completed sufficient remedial action to address the impact the previously identified non-compliance may have caused former student (Learner RL) who was issued *CHC30113 Certificate III in Early Childhood Education and Care* at a point in time when implementation of the RTO's assessment system did not comply with the Rules of Evidence (refer to previously identified non-compliance with Clause 1.8, and details of outstanding remedial action as at 21 January 2020).