



# REPORT

## **Audit report: Menzies Institute of Technology Pty Ltd**

RTO number:	21834
CRICOS number:	02815M
Date/s of audit:	26 May 2020 - 28 May 2020
Date report created:	28 May 2020



## Organisation details

Organisation's legal name:	Menzies Institute of Technology Pty Ltd
Trading name/s:	Menzies Institute of Technology
RTO number:	21834
CRICOS number:	02815M

## Audit team

Lead auditor:	Fred Bonaventura
Auditor/s:	N/A

## Audit details

Application number/s:	N/A
Audit number/s:	AUDREC0010529
Audit reason/s:	Compliance Monitoring
Address of site/s visited: (Desk Audit)	Ground Floor 355 Spencer St West Melbourne VIC 3003 Australia
Date/s of desk audit:	26 May 2020 – 28 May 2020
Organisation's contact for audit:	Uck Han Chun Principal Executive Officer steve@menzies.vic.edu.au 1300244002

## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Fred Bonaventura

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1*, 1.2*, 1.3, 1.8, 1.9, 1.10, 1.11, 1.13, 1.14, 1.16	11.1, 11.2*, 8.18, 8.19, 8.20	Not compliant
Marketing/Recruitment Practices	4.1	1.1, 1.2, 1.3, 1.4	Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	2.2, 2.1, 3.1, 3.3, 8.5, 3.4	Compliant
Support and Progression	1.7	6.1, 6.2, 6.3, 6.4, 6.5, 6.6, 6.9, 8.1, 8.3, 8.4, 8.9	Compliant
Completion	3.1		Compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	4.1, 4.2, 4.3	Compliant

\*Indicates a non-compliant clause

## Background

### Summary of organisation and management structure:

- Menzies Institute of Technology has been providing training services to domestic and international students since 2007 in a variety of industries ranging from automotive, electronics, healthcare, retail food services and welfare support. The organisation initially focused on international students as its primary cohort, and diversified to cater for funded and full fee paying domestic students from 2012 to 2017. Since 2018, the organisation has streamlined its training focus to automotive, dental health and nursing training fields.
- According to the organisational chart provided, the organisation is managed by the PEO/CEO and founding Director, Dr Uck Han Chun. A management team reports to the PEO/CEO consisting of Head of Operations, Sam Chun, Marketing & Admissions Officer, Leslie Hsu, Compliance and Quality Assurance Manager, Ben Thakker, Business Analyst and Compliance Officer, Hai Tran, Student Services and Support Officer, Emi Zhao, and a Student Data Administration Officer, Laura Liu.
- Pursuant to an application made by the organisation to the AAT, an agreement between ASQA and the organisation was reached. The AAT Terms of Agreement Notice specified that there would be a future audit on the Applicant (i.e. the organisation) within approximately 9 - 12 months from the date of the order, that being the 22 May 2019.

### Scope of organisation's registration:

- *AUR30316 Certificate III in Automotive Electrical Technology*
- *AUR30616 Certificate III in Light Vehicle Mechanical Technology*
- *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*
- *AUR40616 Certificate IV in Automotive Electrical Technology*
- *AUR50116 Diploma of Automotive Management*
- *HLT35015 Certificate III in Dental Assisting*
- *HLT54115 Diploma of Nursing*
- *HLT55118 Diploma of Dental Technology*

### Suburb and state of all delivery sites:

- Ground Floor 355 Spencer St  
West Melbourne 3003
- 113 Adderley Street  
West Melbourne 3003
- 396-400 Spencer Street  
West Melbourne 3003
- Level 4  
355 Spencer Street  
West Melbourne 3003

### Third party usage:

- The organisation engages education agents to facilitate the recruitment of overseas students.

### Core clients/target groups:

- The organisation delivers primarily to overseas students.  
At time of audit 93% of students were overseas students, and 7% were domestic students.

**Training Revenue (Funded or fee for service):**

- Fee for service

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

- At time of audit the organisation had 275 overseas student enrolments and 22 domestic student enrolments.

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 Menzies Institute of Technology Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Menzies Institute of Technology Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during a desk audit of Menzies Institute of Technology Pty Ltd conducted on 26 May 2020 - 27 May 2020.
- Other publicly available information - including but not limited to, information published on the organisation's and third-party websites.
- AAT Orders and Terms of Agreement dated 22 May 2019.

**Audit Sample**

Training Products	Mode/s of delivery/assessment*	Current enrolments
		Dom / O'S
<i>AUR30316 Certificate III in Automotive Electrical Technology</i>	Face to Face	0 / 36
<i>AUR30616 Certificate III in Light Vehicle Mechanical Technology</i>	Face to Face	2 / 141
<i>AUR40216 Certificate IV in Automotive Mechanical Diagnosis</i>	Face to Face	0 / 11
<i>AUR40616 Certificate IV in Automotive Electrical Technology</i>	Face to Face	0 / 10
<i>AUR50116 Diploma of Automotive Management</i>	Face to Face	0 / 27
<i>HLT35015 Certificate III in Dental Assisting</i>	Face to Face	18 / 5
<i>HLT54115 Diploma of Nursing</i>	Face to Face	0 / 35
<i>HLT55115 Diploma of Dental Technology</i>	Face to Face	2 / 10

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

**Interviewees**

Name	Position	Training products
Ben Thakker	Compliance and Quality Assurance Manager	All
Sam Chun	Operations Manager	All
Dr Uck Han (Steve) Chun	CEO & Founder	All

## About this Report

This report details findings against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code). If non-compliance has been identified, this report describes evidence of the non-compliance.

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

Correcting 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

Menzies Institute of Technology Pty Ltd did not meet the following requirements:

Standards for RTOs Clauses 1.1 and 1.2, and the National Code Standard 11.2.

Remedial action is required for the following training products:

*AUR30316 Certificate III in Automotive Electrical Technology*  
*AUR30616 Certificate III in Light Vehicle Mechanical Technology*  
*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*  
*AUR40616 Certificate IV in Automotive Electrical Technology*  
*AUR50116 Diploma of Automotive Management*  
*HLT35015 Certificate III in Dental Assisting*  
*HLT54115 Diploma of Nursing*  
*HLT55115 Diploma of Dental Technology*

The organisation is required to provide evidence that demonstrates:

### Training and Assessment

- the organisation has corrected its training and assessment practices for future students to ensure they meet the requirements of the training product, specifically the amount of training provided
- the organisation has ensured that course structures and/or training and assessment strategies meet all the requirements of National Code Standard 11.2
- the organisation has ensured that the duration for the course(s) is consistently recorded and includes public holidays, where these occur during the course delivery period.

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### Standards for RTOs Clause 1.1

*Original Finding: Not compliant*

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

##### Standards for RTOs Clause 1.2

*Original Finding: Not compliant*

For the purposes of Clause 1.1, the RTO determines the amount of training they provide to each learner with regard to:

- a) the existing skills, knowledge and the experience of the learner;
- b) the mode of delivery; and
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

*AUR30316 Certificate III in Automotive Electrical Technology*  
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*AUR40616 Certificate IV in Automotive Electrical Technology*  
*AUR50116 Diploma of Automotive Management*  
*HLT35015 Certificate III in Dental Assisting*  
*HLT54115 Diploma of Nursing*  
*HLT55115 Diploma of Dental Technology*

The following evidence was reviewed:

- AAT Terms of Agreement v04.00 (22 05 19) revised w Annexure A
- TAS AUR30316
- TAS AUR30616
- TAS AUR40216
- TAS AUR40616
- TAS AUR50116
- TAS HLT35015
- TAS HLT54115
- TAS HLT55118
- 26A CRICOS\_timetable\_summary\_form AUR50116
- 28A AE CRICOS\_timetable\_summary\_form AUR30316
- 28A LV CRICOS\_timetable\_summary\_form AUR30616
- 28B AE CRICOS\_timetable\_summary\_form AUR30316
- 28B LV CRICOS\_timetable\_summary\_form AUR30616
- 28D AE CRICOS\_timetable\_summary\_form AUR30316
- 28D LV CRICOS\_timetable\_summary\_form AUR30616
- 28E AE CRICOS\_timetable\_summary\_form AUR30316
- 28E LV CRICOS\_timetable\_summary\_form AUR30616
- 28F LV CRICOS\_timetable\_summary\_form AUR30616
- 28G LV CRICOS\_timetable\_summary\_form AUR30616
- 29A C4 CRICOS\_timetable\_summary\_form AUR40616
- 29B C4 CRICOS\_timetable\_summary\_form AUR40216
- DA29A CRICOS\_timetable\_summary\_form HLT35015

- Dental Technology CRICOS\_timetable\_summary\_form HLT55118
- Auto Trainer meeting 28 11 2019
- Automotive Courses Industry consultation
- Automotive industry consultation letter
- ANMAC - Dip of Nursing course accreditation
- NMBA - HLT54115 course accredited evidence
- Interview with Ben Thakker and Steve Chun.

The organisation has demonstrated compliance with the condition that 'The RTO must maintain ANMAC accreditation for HLT54115 Diploma of Nursing (or its successor) until and unless it is removed from scope. The RTO must comply with all requirements of its ANMAC accreditation.'

The organisation's documented training and assessment strategy includes information regarding course duration, the volume of learning and amount of training which is unclear and inconsistent. Consequently, it is not possible to determine if the amount of training to be provided enables each student to meet the requirements for each unit of competency in which they are enrolled. For example, but not limited to:

### TAS AUR30316 Certificate III in Automotive Electrical Technology (Version 10)

- On page 9 of the TAS the organisation, under 'Course Duration', advises that the course will be delivered and assessed 'Full time: over a period of 60 weeks', with the '60 weeks of delivery [being] inclusive of 12 weeks holiday breaks' and 'Classroom sessions of 20 hours per week.' Effectively, the organisation advises that the course will be delivered over 48 weeks, that is, 60 weeks less 12 weeks holiday. Further, the organisation advises that it will conduct 20 hours of classes each week, so the total hours of face to face training for the course is 960 hours.

These delivery arrangements are confirmed on pages 35-38 where, under 'Appendix 1 Delivery Schedule (sample)' 'Delivery and assessment schedule per qualification', the organisation provides information which shows that the course will be delivered over 60 weeks with classes conducted for 48 weeks, and term breaks totaling 12 weeks. This schedule does not include details of class hours per week.

- On page 7 of the TAS the organisation advises that 'Students required to invest 8-9 hours a week of self-directed learning to complete selfstudy and assessments'. It is unclear if these hours are applicable to the whole 60 weeks (480-540 hours) of the course, or only for the 48 weeks (384-432 hours) when classes are scheduled to be conducted. During an interview with Mr Thakker, he advised that these outside classroom hours are primarily for students to complete off-campus assessments. Even so, this is not clearly stated in the TAS and the hours do not match those reported under 'Training and delivery Structure' (pp. 16-19). Here there is no range of hours, but a fixed 242 hours for assessment and 192 hours referred to as 'Individual Learning & Reflection / Selfpaced'.
- On pages 16-19 of the TAS the organisation, under 'Training and Delivery Structure', provides the following information regarding course hours:
  - Classroom Session including simulated workplace activities..... 960 hours
  - Training Support..... 111 hours
  - Individual Learning & Reflection / Selfpaced..... 192 hours
  - Assessments outside the campus..... 242 hours
  - Total hours (Volume of Learning)..... 1505 hours
  - NCVET hours..... 995 hours

This information does not allow for a clear calculation of the amount of training provided, since for the 'classroom sessions' hours, the time allocated for training has not been differentiated from the time allocated for assessment. Mr Thakker did advise that the individual session plans included the hours for training and time allocated for assessment. Notwithstanding, the information provided in the TAS is then not an accurate reflection of actual practice.

- Further, the inclusion of 'Training Support' hours is confusing as these hours would only be provided on a needs bases and, whilst the organisation advises (p. 8) that 'Training support is provided following the training session', there appears to be no requirement for students to attend, and the sessions may be offered only on a needs basis. Equally, the organisation has included 'Individual Learning & Reflection / Selfpaced' hours, which are not monitored by the RTO (p. 9), so there is no assurance that students will use these hours as proposed.
- Finally, it is unclear how the organisation has allocated 'hours' for assessment. Under 'Training and Delivery Structure' (pp. 16-19), the organisation advises that 242 hours will be allocated for 'Assessments outside the campus', implying that assessments will be conducted off-site. However, under 'Assessment Details and Arrangement' (p. 10), the organisation advises that 'Assessments will be conducted in the classroom and Menzies Automotive workshop or independent learning environment' and 'Learners may complete their assessments at the classroom or independent learning environment.' These arrangements are not reflected in, or consistent with, the advice provided under 'Training and Delivery Structure' (pp. 16-19).
- Under 'Variations to the Volume of Learning and Amount of Training' (p. 9), the organisation advises that 'The Volume of Learning and Amount of Training will vary depending on the existing skills and knowledge of prospective learners who will undertake a Pre-training review and LLN test...' However the organisation does not provide any further information or details regarding any variations to the proposed Volume of Learning and Amount of Training, or how such variations would be approved and implemented.
- The documented training and assessment strategy for delivery for each of the above training products is not consistent with the organisation's demonstrated practice. Specifically, the organisation's timetables show that there are no classes conducted on public holidays, such as January 27, 2020, Australia Day, March 9, 2020, Labour Day, June 8, 2020, Queen's Birthday, 25 September, 2020, AFL Grand Final, and 3 November, 2020, Melbourne Cup. These hours have not been taken into account when calculating class session hours and, therefore, the total amount of training. At the very least the organisation has not shown that for each period, over which the course is scheduled to run, it has ensured that the amount of training provided is consistent with its TAS.

This issue is systemic as it appears across all organisation timetables provided at audit, for the 2020/2021 academic year.

### **TAS AUR30316 Certificate III in Light Vehicle Mechanical Technology (Version 15)**

Note that the footer of this document lists the incorrect qualification and code.

- On page 7 of the TAS the organisation advises that 'Students required to invest 8-9 hours a week of self-directed learning to complete selfstudy and assessments'.
- On page 9 of the TAS the organisation, under 'Course Duration', advises that the course will be delivered and assessed 'Full time: over a period of 60 weeks', with the '60 weeks of delivery [being] inclusive of 8 weeks holiday breaks' and 'Classroom sessions of 20 hours per week.' Effectively, the organisation advises that the course will be delivered over 52 weeks, that is, 60 weeks less 8 weeks holiday. Further, the organisation advises that it will conduct 20 hours of classes each week, so the total hours of face to face training for the course is 1040 hours.

These delivery arrangements are confirmed on pages 32-39 where, under 'Appendix 1 Delivery Schedule (sample)' 'Delivery and assessment schedule per qualification', the organisation provides information which shows that the course will be delivered over 60 weeks with classes conducted for 52 weeks, and term breaks totaling 8 weeks. This schedule does not include details of class hours per week.



- On pages 15-18 of the TAS the organisation, under 'Training and Delivery Structure', provides the following information regarding course hours:

– Classroom Session including simulated workplace activities .....	1040 hours
– Training Support.....	123 hours
– Individual Learning & Reflection / Selfpaced.....	207 hours
– Assessments outside the campus.....	267 hours
– Total hours (Volume of Learning).....	1638 hours
– NCVET hours.....	1035 hours

This information does not allow for a clear calculation of the amount of training provided, since for the 'classroom sessions' hours, the time allocated for training has not been differentiated from the time allocated for assessment. Mr Thakker did advise that the individual session plans included the hours for training and time allocated for assessment. Notwithstanding, the information provided in the TAS is then not an accurate reflection of actual practice.

- Also, it is unclear how the 'self-directed learning' hours, referred to on p. 7, has been accounted when determining the course hours. That is, it is unclear if students will be expected to undertake the 8-9 hours of self-directed study over 60 weeks (480-540 hours), or over 52 weeks (416-468 hours) when classes are being conducted. This information appears to be in conflict with information provided under 'Training and Delivery Structure' (pp. 15-18), where the organisation advises that 207 hours will be allocated to 'Individual Learning & Reflection / Selfpaced', and 267 hours for 'Assessment outside the campus', a total of 474 hours.
- Further, the inclusion of 'Training Support' hours is confusing as these hours would only be provided on a needs bases and, whilst the organisation advises (p. 8) that 'Training support is provided following the training session', there appears to be no requirement for students to attend, and the sessions may be offered only on a needs basis. Equally, the organisation has included 'Individual Learning & Reflection / Selfpaced' hours, which are not monitored by the RTO (p. 9), so there is no assurance that students will use these hours as proposed.
- Finally, it is unclear how the organisation has allocated 'hours' for assessment. Under 'Training and Delivery Structure' (pp. 15-18), the organisation advises that 267 hours will be allocated for 'Assessments outside the campus', implying that assessments will be conducted off-site. However, under 'Assessment Details and Arrangement' (p. 10), the organisation advises that 'Assessments will be conducted in the classroom and Menzies Automotive workshop or independent learning environment' and 'Learners may complete their assessments at the classroom or independent learning environment.' These arrangements are not reflected in, or consistent with, the advice provided under 'Training and Delivery Structure' (pp. 15-18).
- Under 'Variations to the Volume of Learning and Amount of Training' (p. 9), the organisation advises that 'The Volume of Learning and Amount of Training will vary depending on the existing skills and knowledge of prospective learners who will undertake a Pre-training review and LLN test...' However, the organisation does not provide any further information or details regarding any variations to the proposed Volume of Learning and Amount of Training, or how such variations would be approved and implemented.
- The documented training and assessment strategy for delivery for each of the above training products is not consistent with the organisation's demonstrated practice. Specifically, the organisation's timetables are not consistent with the organisation's TAS documents, as the organisation has not factored in lost hours due to public holidays. It is incumbent of the organisation that it ensure that, for each study period, the amount of training is not only consistent with that proposed in the respective TAS, but is actually sufficient and appropriate.

- A review of the remaining TAS documents for automotive courses shows that the issues detected and reported on above are systemic. The information provided in these TAS documents, regarding course duration, and amount of training, is unclear and inconsistent.

### TAS HLT35015 Certificate III in Dental Assisting Version 9

Note that the qualification packaging rules course mandate that 'To achieve this qualification, the candidate must have completed at least 250 hours of work as detailed in the Assessment Requirements of the units of competency.'

- On page 8 of the TAS, the organisation advises that, as an entry required to the course, students will be required to '...to invest 6-8 hours a week of self-directed learning to complete selfstudy and assessments.' Based on information provided on page 9 of the TAS, the course will be conducted over 52 weeks, with 12 weeks of holidays. **It is unclear whether students are expected to undertake 6-8 hours of self-directed learning and assessments over the whole 52 weeks, for 40 weeks when classes and work placement take place, or just for 30 weeks when classes are being conducted.**
- On page 9 of the TAS, under 'Course Duration', the organisation advises that delivery will be 'Full time: over a period of 52 weeks', '52 weeks of delivery is inclusive of 12 weeks holiday breaks.' The organisation further advises that there will be 'Classroom Training and assessment of 20 hours per week' and 'Work placement 252 hours'. Effectively, the course will be delivered over 40 weeks, with 20 hours of scheduled classes for 30 weeks, 600 hours, and 10 weeks of placements.' Given that the organisation plans 252 hours of work placement, over 10 weeks, then 'placements' will be 25.2 hours per week.

These arrangements are, in part, consistent with information provided under 'Training Delivery and Structure' (p. 16), where the organisation advises that 'Classroom Training and simulation' will be allocated 600 hours, and work placement 252 hours. **However, as found in other TAS documents, the organisation has included 167 hours which are either optional or not monitored by the organisation.**

Further, the organisation continues to refer to 'Assessment outside the campus', 186 hours. On page 9 the organisation advises that the Amount of Training '...does not include assessment activities outside the classroom.' These hours are included under 'Training and Delivery Structure' (page 16) and are noted as part of the 'Unsupervised hours... consist of individual learning or self-paced, work placement and assessments.' These delivery arrangements are further confused by the organisation advising that methods of assessment will include 'Workplace observation' and 'Workplace tasks' (p. 13 Assessment Methods Matrix). **It is unclear as how these assessments will be conducted if 'Unsupervised hours' include workplacement.**

- **The documented training and assessment strategy for delivery for each of the above training products is not consistent with the organisation's demonstrated practice. Specifically, the organisation's timetables are not consistent with the organisation's TAS documents, as the organisation has not factored in lost hours due to public holidays. It is incumbent of the organisation that it ensure that, for each study period, the amount of training is not only consistent with that proposed in the respective TAS, but is actually sufficient and appropriate.**
- A review of the remaining TAS documents for courses from the HLT training package shows that the issues detected and reported on above are systemic. The information provided in this TAS document, regarding course duration, assessment arrangements, and amount of training, is unclear.

#### National Code Standard 11.2

**Original Finding: Not compliant**

**In seeking approval under 11.1, the provider must demonstrate any matters requested by the ESOS agency, including through the designated State authority if the provider is a school, which may include but are not limited to the following:**

- 11.2.1 the expected duration of the course does not exceed the time required to complete the course on the basis of full-time study – for VET courses, this is a minimum of 20 scheduled course contact hours per week unless specified by an accrediting authority
- 11.2.2 the expected duration of the course includes any holiday periods or any work-based training
- 11.2.3 any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students
- 11.2.4 the course is not to be delivered entirely by online or distance learning
- 11.2.5 the provider and any partner they engage to deliver a course or courses to overseas students has adequate staff and education resources, including facilities, equipment, learning and library resources and premises as are needed to deliver the course to the overseas students enrolled with the provider
- 11.2.6 the maximum number of overseas students proposed by the provider for the location reflects the appropriateness of the staff, resources and facilities for the delivery of the course.

AUR30316 Certificate III in Automotive Electrical Technology  
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 HLT35015 Certificate III in Dental Assisting  
 HLT54115 Diploma of Nursing  
 HLT55115 Diploma of Dental Technology

The following evidence was reviewed:

- AAT Terms of Agreement v04.00 (22 05 19) revised w Annexure A
- TAS AUR30316
- TAS AUR30616
- TAS AUR40216
- TAS AUR40616
- TAS AUR50116
- TAS HLT35015
- TAS HLT54115
- TAS HLT55118
- Interview with Ben Thakker and Steve Chun.
- Where there is a work placement component, such as that mandated for the *HLT35015 Certificate III in Dental Assisting* and *HLT54115 Diploma of Nursing*, the organisation's documented training and assessment strategies do not describe arrangements for the supervision and assessment of students whilst undertaking work placement, which would enable each student to meet the requirements for each unit of competency in which they are enrolled.

*11.2 In seeking approval under 11.1, the provider must demonstrate any matters requested by the ESOS agency, including through the designated State authority if the provider is a school, which may include but are not limited to the following:*

*11.2.3 any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students.*

National Code of Practice for Providers of Education and Training to Overseas Students 2018  
(National Code 2018)

The organisation has not demonstrated that arrangements for the supervision and assessment of overseas students while in the workplace have been confirmed, and are appropriate for the student cohort and the training product. Whilst there is reference to a 'workplace agreement' in the TAS for *HLT35015 Certificate III in Dental Assisting*, this would serve as evidence of implementation of arrangements detailed in the TAS. Also, whilst any related organisational policy regarding work placement will be relevant, it is in the respective TAS documents where the organisation should provide details of how the policy has been applied by detailing work placement requirements and arrangements contextualised for, and specific to, the course. Documents such as 'work placement agreements' (i.e. clinical placement agreements) and 'work placement log books' would serve as evidence of implementation of work placement arrangements, as detailed in the respective TAS document.

- Further, the organisation, in the TAS documents, does not specify the student capacity, as approved by ASQA, for each course across the provider's locations.

*11.2 In seeking approval under 11.1, the provider must demonstrate any matters requested by the ESOS agency, including through the designated State authority if the provider is a school, which may include but are not limited to the following:*

*11.2.6 the maximum number of overseas students proposed by the provider for the location reflects the appropriateness of the staff, resources and facilities for the delivery of the course.*

National Code of Practice for Providers of Education and Training to Overseas Students 2018  
(National Code 2018)