



REPORT

Evidence review report: Fit Education Pty Ltd

RTO number:	32155
CRICOS number:	03804F
Date/s of review:	28/10/2020
Date report created:	21/10/2020

Organisation details

Organisation's legal name:	Fit Education Pty Ltd
Trading name/s:	Fit Education Fitnace Australia
RTO number:	32155
CRICOS number:	03804F

Review team

Lead reviewer:	Pauline Bowtell
Reviewer/s:	N/A

Review details

Application number/s:

Review number/s:	EVRECC0003020
Review reason/s:	Reconsideration Evidence Review
Date review evidence received:	24/08/2020
Date/s review conducted:	28/10/2020

Review findings

Review finding: Compliant

Report completed by: Pauline Bowtell

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1, 1.2, 1.8		Compliant
Marketing/Recruitment Practices	4.1	1.1, 1.2	Compliant
Completion	3.1		Compliant

*Indicates a non-compliant clause

Scope of review

Training Products	Mode/s of delivery/assessment*	Current enrolments
<i>SIS30115 Certificate III in Sport and Recreation</i>	Mixed delivery, face to face, School based traineeships	661

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

About this Report

This report details findings of evidence submitted with the reconsideration application in response to a notice of intent to make a decision.

Training and Assessment

Training Delivery and Assessment

Standards for RTOs Clause 1.1

Finding: 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

Finding: 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.

Outstanding non-compliance

SIS30315 Certificate III in Fitness

- The following additional evidence was reviewed:
 - 1_Fit Education Audit Response_submitted.pdf
 - Appendix 1 – Training and Assessment Strategy SIS30315.
- The organisation has addressed the non-compliance for future students.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
 - In its response the organisation states:
“An analysis of the amount of training undertaken by audited students NS, TB and RT is represented in the following table. The data was extracted from actual logged hours on Cloud Assess, actual classroom contact hours, actual employment/ work placement hours, and a minimum of time allocated for assessment self-directed learning hours e.g. private study and research, and assessment

Learning Activity	Act/Est	NS	RT	TB
		VETiS Churchie	VETiS IGS	FFS
CloudAssess logged hours	Actual	Homework 320	373	823
Classroom contact hours	Actual	280	280	120
Employment/Workplacement contact hours	Actual	240	240	
Self directed learning hours	Estimate	300	300	300
Assessment	Estimate	60	60	60
	Total Hours	1200	1253	1303

This data clearly demonstrates that the Volume of Learning experienced by these students is sufficient according to the AQF guidelines for Certificate III.

Further analysis of currently enrolled students, and those who have completed SIS30315 within three months prior to the audit, confirms that the Volume of Learning data provided in the table is consistent for all students.

In consideration of the information provided, there is no remedial action required.”

The organisation has not provided sufficient evidence to support the statements it has made in its written response in relation to how it has completed its remedial action.

The table detailing the actual learning activity of the students sampled in this audit, confirms the organisation’s strategies for training and assessment of these students did not plan for sufficient training and assessment. The tabulated actual learning (and assessment) activity was between 1200 and 1303 hours, whereas the organisation’s training and assessment strategies planned between 738 and 1040 hours.

The organisation has not provided sufficient supporting evidence to justify that the amount of training in its training and assessment strategies will enable each learner to meet the requirements for each unit of competency or module in which they are enrolled. Furthermore, due to deficiencies with the assessment system, as recorded under Clause 1.8, and no remedial action has occurred, sufficient evidence has not been provided to confirm the provider is compliant with Clause 1.1 and 1.2.

Analysis of evidence

SIS30315 Certificate III in Fitness

- FIT Education Application for ASQA to Review a Decision.pdf
- 0_Justification and Evidence_Final.pdf
 - Fit Education application to Review a Decision (Draft 17 Aug) Overview
 - Additional evidence provided summary
 - Appendix 1 – Volume of Learning Evidence
 - Appendix 2 – Module 1 Risk Assessment Evidence Sample
 - Appendix 3 – Assessment Resources
 - Appendix 4 – Group Fitness Activity Logbook Samples
 - Appendix 5 – Letters of Offer
 - Appendix 6 – NS Results
 - Appendix 7 – Additional Sample of Completed Students

The provider states in its response:

- The Auditor’s analysis of the table detailing the actual learning activity of the students sampled in the audit (evidenced on page 8/20 in Audit report) inaccurately states that the data does not reflect Fit Education’s Volume of Learning (VoL) strategies for training and assessment supplied in the Fit Education’s response.
- Revised Training and Assessment (TAS) documents and their associated addenda were supplied in Appendix 1 of Fit Education’s Response to audit Non-Compliances, dated 19 June 2020. These TAS clearly state that VoL is from 1200 – 2400 hours. This is also within the AQF guidelines for VoL for Certificate III qualifications. The auditor refers to Volume of Learning data supplied in Fit Education’s **initial evidence** sampled at audit, not the revised TAS provided in Fit Education’s Response to Non-Compliances.
- Additionally, evidence provided in Appendix 1 (Volume of Learning Evidence) details the Volume of Learning of a further sample of students who completed SIS30315 Cert III in Fitness in the three months prior to the audit. This data consistently demonstrates that students of SIS30315 Certificate III in Fitness are well within the Volume of Learning range stated in the TAS provided in Appendix 1 of Fit Education’s Response to Non-Compliance, and also meet the AQF VoL requirements for Certificate III.
- The desk audit process that was conducted by phone and email only, did not provide an opportunity for the Auditor to engage fully with the student data for logged hours, class attendance, assessments, and video recordings of assessments contained in Fit Education’s student management system WiseNet, and the Learning Management System Cloud Assess.

- Fit Education therefore concludes that no remedial action is required for past students or for students sampled at audit. Fit Education has provided evidence that past students and students sampled at audit have met the minimum VoL requirements for an AQF Certificate III, and that the VoL is clearly stated in the amended TAS supplied to the auditor in Fit Education's Response to Audit Non-compliance for future students.

The provider has demonstrated through its written response and supporting evidence that it has sufficiently assessed the impact the non-compliance may have caused and provided sound reasons for not needing to carry out specific remedial action.

Standards for RTOs Clause 1.8

Finding: 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>

Table 1.8.2 Rules of Evidence

Validity	<p>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.</p>
Sufficiency	<p>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.</p>

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.

Outstanding non-compliance

SIS30315 Certificate III in Fitness

SISFFIT007 Instruct group exercise sessions

BSBRSK401 Identify risk and apply risk management processes

- The following additional evidence was reviewed:
 - 1_Fit Education Audit Response_submitted.pdf
 - Assessment tools including RPL for:
 - SISFFIT007 Instruct group exercise sessions*
 - BSBRSK401 Identify risk and apply risk management processes*
 - Appendix 2 – Revised assessment tools (including RPL) for Module 7, including
 - SISFFIT007 Instruct group exercise sessions
 - BSBRSK401 Identify risk and apply risk management processes
 - Appendix 3 – Validation of Assessment items Module 7 Cert III in Fitness
 - Appendix 4 – Mapping Document Module 7 to accompany assessment tools
 - Appendix 5 – Assessment Procedure Flowchart. This flow chart illustrates the workflow of assessment, and is implemented as an adjunct to Fit Education's Assessment Policy
 - Appendix 6 – Assessment and Feedback presentation (Slides attached, and video presentation link supplies)
 - Appendix 7 – Validation schedule.
 - Completed student assessment items (and the assessment tools used):
 - SISFFIT007 Instruct group exercise sessions*
 - BSBRSK401 Identify risk and apply risk management processes*
 - 1_Fit Education Audit Response_submitted.pdf
 - Additional completed student assessment items were not submitted.
 - Remedial action evidence:
 - SISFFIT007 Instruct group exercise sessions*
 - BSBRSK401 Identify risk and apply risk management processes*
 - 1_Fit Education Audit Response_submitted.pdf.
- The organisation has not addressed the non-compliance for future students.

The following analysis provides guidance on the areas of non-compliance that remain. Examples of non-compliances are provided; however, this is not an exhaustive list.

SIS30315 Certificate III in Fitness

- Validity and Sufficiency – the assessment tools do not address all unit of competency requirements. For example, but not limited to:
 - Performance Evidence:
 - BSBRSK401 Identify risk and apply risk management processes*
 - "Evidence of the ability to apply organisational policies, procedures and processes to:
 - Consult with relevant stakeholders to analyse and evaluate risks
 - Identify and evaluate control measures
 - Develop and implement treatment plans for own area of responsibility".
- It is not clear that the amended master assessment tool provides students with practical assessment tasks and access to the required organisational documentation to demonstrate they meet this requirement.

- Knowledge Evidence:
 - BSBRSK401 Identify risk and apply risk management processes*
 - “Describe the organisation’s auditing requirements related to risk management”

The master assessment tools have not been amended to address this original non-compliance and still do not assess this requirement.

Although the amended master assessment tool references the following documents that form part of the assessment tasks, these documents were not submitted as evidence to confirm the tool now meets the training product requirements, principles of assessment and rules of evidence:

- Task 4 Community Fitness Programs assessment resources
 - Group Exercise Session – Sample
 - Group Exercise / Circuit Session Outline
 - Alternative Session Plan Template
 - Adult Exercise Pre-Screening Tool
 - Mentor Guide
 - Downloadable Coach / Mentor Feedback Form.
 - Assessment conditions:
 - SISFFIT007 Instruct group exercise sessions*
 - “Assessment activities that allow the individual to:
 - demonstrate the ability to instruct a variety of group exercise sessions:
 - catering for:
 - beginners, intermediate and advanced participants”
- The amended master assessment tool does not assess this requirement.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students.

In its response the organisation states:

“Note:

- *2. At audit, TB’s Theory Assessment Task 1 and Group Exercise Sessions – the pdfs were not provided as evidence by the RTO, although screen shots of the completed online Theory and Prac evidence clearly indicated that .pdf documents had been loaded and were assessed. Unfortunately, these links were inactive in the screenshots, but were completed and uploaded by the student. Similarly, evidence for NS Group Exercise sessions, whilst not provided by the RTO, was stored in Module 5 of the Certificate III in Fitness and was assessed.”*

The organisation did not provide completed remedial assessment evidence for students TB, RT and NS sampled at audit, current students or for students who completed in the past three month, in its response to confirm sufficient assessment has now occurred.

Further in its response the organisation states:

“The following factors were considered when assessing the impact this non-compliance may have caused to students:

- *No occupational licensing, certification or specific legislative requirements apply to SIS30315. Graduates of this qualification work under supervision, where risks are managed through pre-existing risk assessment and hazard-control processes.*
- *Analysis of graduate data from SIS30315 Certificate III in Fitness completions in the three months prior to the audit date reveals:*
 - *50 graduates*
 - *43 graduates continued to Certificate IV in Fitness. Two of the sampled students, TB and NS advanced to Certificate IV.*

Graduates who continue to SIS40215 Certificate IV in Fitness progressively undertake a range of theory and practical assessments that reinforce and build on knowledge and skills acquired in SIS30315 Certificate III in Fitness.

- *Feedback from industry consistently confirms that Fit Education SIS30315 graduates are in demand and are valued as high-quality employees from commencement of their employment.*
- *Whilst the number of assessed group sessions instructed by sampled students did not meet the requirements of the unit of competency, student log books consistently record multiple sessions of group exercise instruction with supervision by industry current trainers. It is acknowledged that the summative assessment evidence was insufficient to meet the UoC evidence requirements; however, the formative assessment and feedback from trainers provides evidence of performance repetition over time and valuable learning environment for students to finesse their performance and knowledge.*

In consideration of the above factors, the risk for past graduates is sufficiently low that no remedial action is required. The Assessment system has since been revised to ensure that all requirements are met, and systematic validation will be undertaken as per the attached validation schedule.”

The organisation has erroneously assessed the impact the non-compliance has caused past students as low and not requiring remedial action. Students can only be assessed as meeting the requirements of the training product if they were sufficiently assessed, which they were not. As previously stated in this report following the audit –

”For SISFFIT007 Instruct group exercise sessions and BSBRSK401 Identify risk and apply risk management processes due to deficiencies that exist with the master assessment tools as noted above, it cannot be confirmed valid and sufficient evidence has been collected for all students assessed for an assessor to determine competency against all the requirements of the units of competency.”

The completed student formative and summative assessment that the organisation refers to in its response was sampled at audit and it was determined students had not been sufficiently assessed as meeting the requirements of the training product, principles of assessment or rules of evidence. Therefore, remedial action has not occurred for past, current and the students sampled at audit and these student assessments remain non-compliant.

Analysis of evidence

SIS30315 Certificate III in Fitness

SISFFIT007 Instruct group exercise sessions

BSBRSK401 Identify risk and apply risk management processes

- FIT Education Application for ASQA to Review a Decision.pdf
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 - Additional evidence provided summary
 - Appendix 1 – Volume of Learning Evidence
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- Appendix 7 – Additional Sample of Completed Students

The provider submitted a written response drawing attention to the following statements from the training products:

- SIS303015 - qualifications description:
 - This qualification reflects the role of instructors who perform a range of activities and functions within the fitness industry.
 - Depending on the specialisation chosen, this qualification provides a pathway to work as an instructor providing exercise instruction for group, aqua or gym programs.
 - They work independently with some level of autonomy in a controlled environment such as fitness, leisure, aquatic and community centres where risks are managed through pre-existing risk assessment and hazard control processes.
- BSBRSK401 Identify risk and apply risk management processes:
 - This unit describes the skills and knowledge required to identify risks and to apply established risk management processes to a defined area of operations that are within the responsibilities and obligations of the role.
- SISFIT007 Instruct group exercise sessions:
 - These individuals (Fitness Instructors) typically work independently with some level of autonomy in a controlled environment. Work is performed according to relevant legislation and organisational policies and procedures.

Performance evidence

The provider states that in consideration of the above and with regards to the performance evidence requirements, students:

- undertake assessment activities and record all information in their logbooks (full details in Module 7 Logbook and Practical assessment tasks supplied in Appendix 2). The provider also states that assessment that further addresses BSBRSK401 Elements and Performance Criteria is also contained in other units (Modules) in the SIS30315 Certificate III. For example, In Module 1, students are required to complete Industry standard WHS check on their chosen fitness facility to identify and address risk. (See sample Appendix 2 –Module 1 Risk Assessment evidence sample). Whilst this assessment is not mapped to the BSBRSK401 unit it demonstrates that Fit Education's holistic assessment processes for identifying, managing and controlling risk is comprehensively evidenced throughout the SIS30315 Certificate III in Fitness, and is not confined to assessment tasks in BSBRSK401 only.
- perform health screening for all participants, using approved APSS Pre-Exercise Screening system. This includes referral of participants to seek guidance from a health professional as necessary, as per industry guidelines / standards for organisations by Fitness Australia. This is evidenced as a core and fundamental risk assessment and control process in the context of group fitness instruction.

Knowledge evidence

- BSBRSK401 – Students are required to research three community fitness programs in their local area (full details in Module 7 Theory task 4 supplied Appendix 2 Response to Non Compliance). The following information is requested in the assessment task (amongst many other details that are required):
 - What are the security requirements for each program?
 - What equipment does the provider need to supply for each program?
 - What documentation is a provider required to provide/complete when conducting sessions?
 - How is risk identified, managed and monitored for each program, and whether this meets the current risk management standards? (Quality assurance, reporting of risks, choice and application of control measures etc).

The provider states that the assessment does not specifically state 'describe the organisation's auditing requirements related to risk management' (verbatim from training package UoC). It has applied sound pedagogical practice to this assessment task so that the evidence implicit in this task will adequately demonstrate students' knowledge of organisation's auditing requirements in relation to risk management. Module 7 Theory Task 4 is an integrated assessment that encompasses knowledge evidence of SISFIT007 and BSBRSK401 in a holistic assessment task.

It provides students with an opportunity to evidence that they are able to describe the mandated requirements (i.e. audit) related to an organisation's risk management.

Additionally, the assessment in Module 1 of SIS30315 Certificate III in Fitness can be mapped to elements of BSBRK401 described above (see Appendix 2 of this document). The provider notes that this further demonstrates its commitment to thorough assessment of the knowledge requirement pertaining to risk management and control, beyond the performance and knowledge evidence requirements of BSBRK401 only. The provider believes that the master assessment tool provides students with knowledge-based assessment tasks that are managed through pre-existing risk assessment and hazard control processes within a defined area of operations within the responsibilities of the role of Group Fitness Instructor as specified in SIS30315 Qualification, and the BSBRK401 unit of competency.

Assessment conditions

- SISFIT007 - The Practical and Logbook assessment activity is accompanied by several supplementary documents. The provider notes that these documents were not sighted (or requested) by the Auditor at the initial audit, however they are referenced in the Auditor's comments in the Response to Non-Compliance document. The provider has included evidence as per Appendix 3 (Assessment resources) of these documents. Instructions for students to demonstrate the ability to instruct a variety of group exercise sessions catering for beginners, intermediate and advanced participants is noted on the "Group Exercise Session Sample document" contained in Appendix 3. These documents form part of the practical assessment tasks in Module 7 and would have been observed as PDF icons in the evidence provided all students, and to the Auditor at initial audit.

The provider has demonstrated through its written response and supporting evidence that it has address the non-compliance for future students.

Remedial action

The provider's response includes the following justification for the assessment of the impact that the non-compliance:

- 43 of the 50 students that had completed the SIS30315 Certificate III in Fitness in 3 months prior to the audit date had continued to Certificate IV in Fitness with Fit Education.
- Unit assessment within other modules of the Cert III in Fitness (eg Module 1) provide supplementary evidence that meet the requirements for the gaps identified and could have been made available to the Auditor at the initial audit, or by remote access to Cloud Assess as discussed previously.
- Additionally, Fit Education Learning and assessment of skills and knowledge at the higher AQF level would address the highlighted 'gaps' in their knowledge and skills, particularly as a large proportion of the Cert IV in Fitness relates to risk identification, application of risk management processes, and continuous assessment in group fitness training.
- Two of the three students sampled had continued to and are currently enrolled in Certificate IV in Fitness, therefore were included in the 43 continuing students.
- For the seven students who received SIS30315 Certificate III in Fitness and did not continue to SIS40215 Certificate IV in Fitness, Fit Education took an industry perspective on the 'impact' on these students having not been judged as inadequately assessed against the specific performance criteria highlighted in the original Audit report.
 - The seven graduates received SIS30315 Certificate III in Fitness that enabled them to instruct group fitness classes in a controlled environment where risks are managed through an organisation's pre-existing risk assessment and hazard control processes.
 - They undertook training across 18 – 24 months, in a variety of fitness settings, under the supervision of fully qualified industry trainers and assessors, and have logged multiple fitness classes, plans, risk assessments etc during that time. A sample of this is provided as evidence in Appendix 4 of this document (Group fitness activity - Logbook Samples).
 - Supplementary evidence from other units (such as Module 1 evidenced at Appendix 2, and Logbook evidence at Appendix 4 of this document) provides samples of assessment activities that address the requirements for the identified gaps. This was available at the initial audit and could have been discussed, and directly accessed on Cloud Assess at a site audit or by remote access that the Auditor was unable to establish due to technology problems.

- The impact on these students was deemed to be minimal: they had received adequate training and assessment as outlined above. There was no perceived health and safety risk to the graduates or the participants who took part in classes that they instructed, and therefore Fit Education judged that no remedial action was necessary.
- The provider states that the CEO, a highly experienced sport/fitness industry specialist in his own right, remains confident that this initial impact assessment is justified.

The provider has demonstrated through its written response and supporting evidence that it has sufficiently assessed the impact the non-compliance may have caused and provided sound reasons for not needing to carry out specific remedial action.

Marketing/Recruitment Practices

Standards for RTOs Clause 4.1

Finding: 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.

National Code Standard 1.1

Finding: Compliant

The registered provider must ensure that the marketing and promotion of its courses and education services in connection with the recruitment of overseas students or intending overseas students, including through an education agent (in accordance with Standard 4), is not false or misleading, and is consistent with Australian Consumer Law.

National Code Standard 1.2

Finding: Compliant

The registered provider must, in seeking to enter into written agreements with overseas students or intending overseas students, not provide any false or misleading information on:

- 1.2.1 its association with any other persons or organisations the registered provider has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol
- 1.2.2 any work-based training a student is required to undertake as part of the course
- 1.2.3 prerequisites—including English language proficiency—for entry to the course
- 1.2.4 any other information relevant to the registered provider, its courses or outcomes associated with those courses.

Outstanding non-compliance

SIS30315 Certificate III in Fitness

SISFIT007 Instruct group exercise sessions

BSBRSK401 Identify risk and apply risk management processes

- The following additional evidence was reviewed:
 - 1_Fit Education Audit Response_submitted.pdf
 - Appendix 8 – Fit Education Website Landing Page Cert III in Fitness (International) Screen Shot
 - Website URL <https://fiteducation.edu.au/personal-training-courses/certificate-iii-in-fitness-international/> viewed on 2 July 2020.
- The organisation has addressed the non-compliance for future students.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
 - In its response the organisation states:

“Fit Education’s Enrolment procedure for domestic and international students includes a mandatory telephone or in-person contact/ interview prior to enrolment. No exception is made to this procedure.

Fit Education currently has three international students enrolled under its CRICOS registration (anticipated international enrolments have been negatively affected by COVID-19). These students meet the minimum age and IELTS entry requirements and were fully informed of the minimum age and IELTS requirements for entry into the program prior to enrolment.

In consideration of the pre-enrolment procedure that is consistently undertaken by Fit Education, no remedial action is required. The marketing materials have been audited and revised and now meet the requirements for Standards for RTOs 4.1 and National Code 1.1 and 1.2.”

The organisation has not provided actual evidence to support the statements made in its response concerning remedial action. The organisation has not provided evidence that demonstrated past, current (prior to the website update) and students sampled at audit have now been sufficiently informed of the entry requirements.

Analysis of evidence

SIS30315 Certificate III in Fitness

SISFFIT007 Instruct group exercise sessions

BSBRSK401 Identify risk and apply risk management processes

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The provider submitted a written response stating:

- There are no entry requirements for SIS30315 for domestic students (as per training package for SIS30315).
- Fit Education self-determined a policy that mandates entry requirements for International students as follows:
 - Minimum age of 18 years
 - Additionally, Fit Education adopted an industry standard of IELTS of 5.5 or above (or equivalent).

The provider notes that the non-compliance related to an amended web page that inadvertently omitted the age entry requirement for international students and that this was an oversight and easily rectified when noted. The provider does not consider that this error could in any way be considered an intent to deceive or mislead potential students.

Fit Education's response with regards to remedial action:

- Past International Students: Fit Education has no past International students; therefore, no remedial action is required.
- Past domestic students: There are no entry requirements for past domestic students; therefore, no remedial action is required.
- Current International students: CRICOS registration was granted in August 2019, and FIT Education has three international students who are currently enrolled and undertaking SIS30315.
 - Signed Letters of Offer for two international students (currently enrolled) were emailed to the Auditor as evidence during the audit.
 - The Letter of Offer clearly states the entry requirements for admission into the course, and Letters of Offer are signed and accepted by the student prior to enrolment.
 - Letters of Offer for all three International students are provided in Appendix 5 – Letters of Offer, therefore no remedial action is required.
 - These Letters of Offer clearly show the students date of birth (age) and all students are aged 18 or over.
- Students sampled at audit were domestic students and therefore not required to meet any entry requirements, therefore no remedial action is required as there is no remedial action that can be taken.

The provider believes that the auditor has incorrectly:

- interpreted the 'nil entry requirement' for domestic students, by requesting remedial action be taken for these students.
- anticipated that remedial action would be taken for non-existent entry requirements for domestic students (past students and students sampled at audit).
- incorrectly interpreted the information in the International student's Letter of Offer supplied during the initial audit, by requesting that remedial action be taken for these students.

The auditor is satisfied with the provider's response and evidence address the requirements of Clause 4.1 and the National Code Standard 1.1 and 1.2.

Completion

Standards for RTOs Clause 3.1

Finding: 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.

Outstanding non-compliance

SIS30315 Certificate III in Fitness

SIS50612 Diploma of Sport Development

SIS50319 Diploma of Sport

- The following additional evidence was reviewed:
 - 1_Fit Education Audit Response_submitted.pdfX
- The organisation has not addressed the non-compliance for future students. For example, but not limited to:
 - As Clause 1.8 remains non-complaint, the non-compliance has not been addressed for future students.
- The organisation has not planned and/or carried out sufficient remedial action to identify and address the impact the non-compliance may have caused students. For example, but not limited to:
 - In its response the organisation states:

*“Whilst confident in the outcome, Fit Education has undertaken a systematic manual check of WiseNet (SMS) for all students who have received Certification in three months prior to the audit date. Fit Education confirms that **all students** were eligible for AQF certification.*

NOTE: Whilst there was a clearly highlighted date error in the audited sample for student NS, (assessment date later than AQF certification date), there is sufficient evidence that NS completed all relevant assessment items (current version at the time) to meet criteria for Issuance of AQF Certification”.

“In consideration of the risk assessment evidence for Clauses 1.1, 1.2, 1.8 and 3.1 above, in addition to the actions subsequently implemented as described, no remedial action is required.

A manual check has been undertaken to verify that all students certified within the three months prior to audit were assessed as meeting the requirements prior to issuance of AQF certificates.”

The organisation has not provided actual evidence to support the statements concerning remedial action made in its response.

The organisation has not demonstrated it has sufficiently remediated the impact caused to past, current and students sampled at audit as required for Clause 1.8 to confirm students have now demonstrated the skills and knowledge required to be competent and eligible for AQF certification.

Further, the organisation has not provided evidence that the AQF certification qualification issued to student NS now has the correct issuance date.

Analysis of evidence

SIS30315 Certificate III in Fitness

SIS50612 Diploma of Sport Development

SIS50319 Diploma of Sport

- FIT Education Application for ASQA to Review a Decision.pdf
- 0_Justification and Evidence_Final.pdf
 - Fit Education application to Review a Decision (Draft 17 Aug) Overview
 - Additional evidence provided summary
 - Appendix 1 – Volume of Learning Evidence
 - Appendix 2 – Module 1 Risk Assessment Evidence Sample
 - Appendix 3 – Assessment Resources
 - Appendix 4 – Group Fitness Activity Logbook Samples
 - Appendix 5 – Letters of Offer
 - Appendix 6 – NS Results
 - Appendix 7 – Additional Sample of Completed Students

The provider submitted a written response and accompanying screen shots extracted from student NS's assessment records, showing all assessments for all units of competency as evidence of the assessment having been completed prior to the issuance of Certificate III. Further to this, the evidence includes a screen shot of from the Queensland Curriculum and Assessment Authority recording student NS's completion date for SIS30315 Certificate III in Fitness. The provider also states that NS completed SIS30315 Certificate III in Fitness and submitted hardcopy assessments which were made available to the Auditor at the initial audit.

Further to this the provider noted in its response that it had undertaken a systematic manual check of WiseNet for students who have received certification in SIS30315 Certificate III in Fitness in the three months prior to the initial audit. Evidence to support this was provided in Appendix 7 Additional samples of completed students and included:

- Screen shots of sample students (10% of students who completed within 3 months prior to audit) showing dates of completion for all Units of Competency for Cert III in Fitness
- Screen shots of Certificate III in Fitness testamurs issued to above students.

With regards to the non-compliance regarding Clause 1.8 the provider notes the following in its response:

- As the Auditor has connected the non-compliance for Clause 1.8 to the non-compliance for Clause 3.1, we refer to information and additional evidence that is supplied in response to Clause 1.8 in this document.

The evidenced indicates that the provider 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 as required by Clause 3.1.