



Assessment of evidence of compliance

Provider details

Provider's legal name:	H.C.H INVESTMENTS PTY. LTD
Business/Trading name/s:	Knights College
RTO code:	41269
CRICOS code:	03543M

Compliance case details

Application number/s:	RENCRI0001234
Audit number:	AUDREC0012743
Compliance case reason/s:	Application - Renewal
Provider's contact details:	Mr Hussein Sheikh Chief Executive Officer Email: usayn@live.com.au Phone: 0478 165 721

Compliance team

Compliance Officer:	Ian Whitehouse Sarah Dew
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Assessment summary

The below describes ASQA's assessment (in pale blue) of the provider's description of actions undertaken to return to compliance and supporting evidence submitted on 17 May 2024 in response to the findings of non-compliance against the *Standards for Registered Training Organisations (RTOs) 2015* (Standards for RTOs) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code).

It should be read in conjunction with the original Performance Assessment (audit) report dated 17 April 2024 which sets out the details of the non-compliance.

Assessment findings as at 19 June 2024

Practice	Findings	Standards for RTOs (Clauses)	National Code (Standards)
Training and Assessment	Compliant	1.1, 1.2, 1.8	11.2
	Not compliant	-	-
Enrolment	Compliant	7.1	-
	Not compliant	-	-
Regulatory Compliance and Governance	Compliant	2.2	-
	Not compliant	-	-

Non-compliances reviewed

Clause 1.1 of the Standards for RTOs

Action required by performance assessment (audit) report

Provide evidence that demonstrates it:

- understands the causes of the issues.
- has rectified its training and assessment strategies and practices where VET courses are delivered to overseas students to ensure delivery is based on a minimum of 20 scheduled course contact hours per week, based on a full-time study load to ensure students are able to meet the requirements of the training products.

has established and implemented appropriate systems and resources to ensure where VET courses are delivered to overseas students to ensure delivery is based on a minimum of 20 scheduled course contact hours per week, based on a full-time study load to ensure students are able to meet the requirements of the training products.

Actions taken by provider to return to compliance

Knights College has rectified the training and assessment strategies and practices to ensure delivery is based on a minimum 20 scheduled course contact hours per week to the overseas students. Timetables have been updated accordingly. Delivery and assessment plan have been created for each timetable to support the implementation of the training and assessment strategy.

Evidence provided to ASQA of compliance

- Training and assessment strategy (including timetables & delivery plan, page 20 to 31)

	<p>Analysis of actions taken and evidence of compliance</p> <p>The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.</p> <p>Finding: Compliant</p>
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<p>Clause 1.2 of the Standards for RTOs</p>	<p>Action required by performance assessment (audit) report</p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> • understands the causes of the issues. • has rectified its training and assessment strategies and practices for learners to ensure it determines and will provide an appropriate amount of training to learners for theory and practical training. • has established and implement appropriate systems and resources to ensure training and assessment strategies and practices provide an appropriate amount of training to learners.
	<p>Actions taken by provider to return to compliance</p> <p>Knights College has revised its training and assessment strategies and practices to ensure that learners receive an appropriate amount of training. Please refer to the section 2.2 Duration & amount of training & delivery and assessment plan updated in the training and assessment strategy.</p>
	<p>Evidence provided to ASQA of compliance</p> <p>Training and assessment strategy (including timetables & delivery plan, page No; 11, 20 to 31)</p>

	<p>Analysis of actions taken and evidence of compliance</p> <p>The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.</p> <p>Finding: Compliant</p>
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<p>Clause 1.8 of the Standards for RTOs</p>	<p>Action required by performance assessment (audit) report</p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> • understands the causes of the issues • has rectified its assessment practices (to comply with Clause 1.8) and established appropriate systems that are followed. The evidence to be provided must.
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	<ul style="list-style-type: none"> ○ demonstrate the provider will implement an assessment system that ensures assessment: - will be conducted in accordance with the Principles of Assessment and Rules of evidence.
	<p>Actions taken by provider to return to compliance</p> <ul style="list-style-type: none"> ● Knights College recognise that a number of students have copied their responses directly from the learner guide, and that trainers and assessors have not identified this. ● To address this issue going forward, Knights College have implemented an <i>Assessment Marking Policy</i>. All trainers and assessors are required to follow this policy` strictly. This policy requires all trainers and assessors to ensure that students have not directly copied their responses from the learner guide or other sources, and random checks of at least three completed student files from each cohort will be reviewed by management as validation that this policy has been complied with by all trainers and assessors.
	<p>Evidence provided to ASQA of compliance</p> <p>1.8 Knights College Assessment Marking Policy</p> <ul style="list-style-type: none"> ● 1.8 i - Assessment Quality check

	<p>Analysis of actions taken and evidence of compliance</p> <p>The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.</p> <p>Finding: Compliant</p>
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<p>Clause 2.2 of the Standards for RTOs</p>	<p>Action required by performance assessment (audit) report</p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> ● understands the causes of the issues. ● has established appropriate systems to monitor training and assessment strategies and practices to ensure ongoing compliance with Standard 1. <p>has established and implemented appropriate systems to evaluate and use the outcomes of the evaluations to continually improve the provider's training and assessment strategies and practices.</p>
	<p>Actions taken by provider to return to compliance.</p> <p>Knights College has established appropriate systems to monitor training and assessment strategies and practices to ensure ongoing compliance. Monthly Quality and Compliance Meetings will be held to review and analyse data collected and plan the RTO's quality and assurance.</p> <p>Please refer to attachment 2.2 Quality and compliance assurance</p>

	<p>Evidence provided to ASQA of compliance</p> <ul style="list-style-type: none"> • 2.2 Quality and compliance assurance
	<p>Analysis of actions taken and evidence of compliance</p> <p>The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.</p> <p>Finding: Compliant</p>
<p>Standard 11.2 of the National Code</p>	<p>Action required by performance assessment (audit) report</p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> • understands the causes of the issues. • has established and implemented appropriate systems, that are followed, to ensure for all of its scope of registration, and consistent with its training and assessment strategies, the provider has: • amended the expected duration of the course to ensure students are able to complete the course on the basis of full-time study and is based on a minimum of 20 scheduled course contact hours per week. <p>Actions taken by provider to return to compliance</p> <p>Knights College has revised its training and assessment strategies, timetable for weekdays & weekend and practices to ensure that the duration of the course is based on a minimum of 20 scheduled course contact her per week.</p> <p>Please refer to the section 2.2 Duration & amount of training, delivery and assessment plan updated in the training and assessment strategy.</p> <p>Evidence provided to ASQA of compliance</p> <p>1.1 Training and assessment strategy (including timetables & delivery plan)</p>
	<p>Analysis of actions taken and evidence of compliance</p> <p>The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.</p> <p>Finding: Compliant</p>
<p>Standard 7.1 of the National Code</p>	<p>Action required by performance assessment (audit) report</p> <p>Provide evidence that demonstrates it:</p> <ul style="list-style-type: none"> • understands the causes of the issues.

- has established and implements a system to ensure it is not knowingly enrolling overseas students seeking to transfer from another registered provider's course prior to the overseas student completing six months of his or her principal course unless an exception applies.
- conducted a review of currently enrolled concurrent students to ensure that students are maintaining enrolment in both courses, identified students who are no longer undertaking study in their principal course and has notified the appropriate agency or any government sponsor of the overseas student.

Actions taken by provider to return to compliance

- Knights College does not accept student transfers from other providers. All students are completing the Certificate II in Security Operations with Knights College as a concurrent course with their primary course of study. This was communicated to the auditors during the audit that Knights College does not allow students to transfer from another course at any time.
- The ASQA website currently states "an overseas student in Australia on a student visa is permitted to undertake additional study." This is currently published at <https://www.asqa.gov.au/faqs/can-overseas-student-who-holds-student-visa-undertake-additional-study-same-time-their>. As per the ESOS Act, the National Code, and ASQA's own information there is no legislative or regulatory requirement for a student to have completed at least six months of their primary course prior to studying a concurrent course. Therefore, the statement in the performance assessment (audit) report "overseas students may undertake additional study at the same time as their principal course; however, they must have completed a minimum of 6 months of the principal course" is factually incorrect, is not supported by legislation, and is not required by any regulatory requirements applicable to Knights College.
- During the audit, the auditors made reference to the concurrent studies update published by the Department of Education at <https://www.education.gov.au/international-education/announcements/concurrent-studies-update>. This update does not constitute a change of legislation or regulatory requirements, rather it is an announcement of a change of functionality to PRISMS only. There were no issues raised during the audit, or noted within the Performance assessment (audit) report, with the issuance of CoEs to students, so it is assumed that all CoEs issued by Knights College through PRISMS have been issued correctly.
- Knights College does not have the ability to check other course enrolments of students in PRISMS. This functionality is not available to RTOs, and Knights College are therefore dependent on students being truthful in the provision of information during enrolment.
- Knights College has no legal authority to ensure that students meet the attendance and progress requirements of their principal course of

study. Knights College does work with students to ensure that they are enrolled into a course which suits their existing commitments, however if a student does not attend or meet progression requirements in their principle course of study, this is outside of our control.

- Knights College acknowledges that for the two students noted in the report, they had indicated that they were not undertaking a principle course of study. This is an administrative error and was not identified during enrolment or the creation of the Confirmation of Enrolments for these two students.

To address this issue going forward, Knights College have implemented an *International Student Enrolment Policy*. All enrolment officers and administrative staff are required to follow this policy and have signed an agreement that they will follow it. This policy requires all enrolment officers to ensure that students accurately identify their principal course requirements at enrolment, and that this is checked when issuing the Confirmation of Enrolment. The management team and Knights College will conduct a further check of all enrolment forms to ensure accuracy prior to the commencement of each student cohort.

Evidence provided to ASQA of compliance

7.1 Knights College International Student Enrolment Policy

7.1 i (International) Pre training enrolment form

Analysis of actions taken and evidence of compliance

The provider has completed sufficient actions to rectify the non-compliance, this is corroborated by the evidence submitted.

Finding: Compliant