



# REPORT

## **Audit report: Australian Institute of Advanced Studies Pty Ltd**

RTO number:	40730
CRICOS number:	03469E
Date/s of audit:	29 January 2020
Date report created:	3 February 2020



## Organisation details

Organisation's legal name:	Australian Institute of Advanced Studies Pty Ltd
Trading name/s:	Australian Institute of Advanced Studies
RTO number:	40730
CRICOS number:	03469E

## Audit team

Lead auditor:	Sharyn Gillick
Auditor/s:	N/A

## Audit details

Application number/s:	ADDVET0031959 ADDCRI0004110 ADDVET0031960 ADDCRI0004111
Audit number/s:	AUDREC0010110
Audit reason/s:	Application - Change
Address of site/s visited:	"L" Block 1030 Cavendish Road Mount Gravatt East QLD 4122 Australia
Date/s of audit:	29 Jan 2020
Organisation's contact for audit:	Noel Higginbotham CEO noel@aus-ias.edu.au 0733438073

## Original finding at time of audit

### Audit finding: Concerning non-compliance

Report completed by: Sharyn Gillick

Practice	Standards for RTOs	National Code	Finding
Training and Assessment	1.1, 1.2, 1.3*, 1.8*, 1.13, 1.14*, 1.15, 1.16	11.1, 11.2*	Not compliant
Marketing/Recruitment Practices	4.1*	1.1*, 1.2*, 1.3, 1.4	Not compliant
Enrolment	5.1, 5.2*, 5.3	2.2, 2.1*, 3.1*, 3.3*, 8.5, 3.4	Not compliant
Support and Progression	1.7	6.1, 6.2, 6.3, 6.4, 6.5, 6.6,	Compliant

		6.9, 8.1, 8.3, 8.4	
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:

- Noel Higginbotham and Pankaj Saxena, both formerly TAFE trainers and assessors, established Australian Institute of Advanced Studies Pty Ltd in 2013 to offer quality training in the engineering industries. Training products from the creative arts and culture training package was added to scope to accommodate established trainers and assessors from this field who wanted to join the organisation.
- The organisation was registered for CRICOS in February 2016, which has led to the addition of training products from community services training package based on education agent feedback and demand from the international market.
- The organisation operates in a renovated warehouse on the grounds of the Mt Gravatt TAFE campus. Management structure includes:
  - Director and CEO: Noel Higginbotham
  - Director: Pankaj Saxena
  - Operations Manager: Nikhil Saxena
  - Trainers and assessors

Scope of organisation's registration:

- BSB30415 Certificate III in Business Administration
- BSB50215 Diploma of Business
- CHC33015 Certificate III in Individual Support
- CHC43015 Certificate IV in Ageing Support
- CUA30715 Certificate III in Design Fundamentals
- CUA31015 Certificate III in Screen and Media
- CUA50715 Diploma of Graphic Design
- CUA51015 Diploma of Screen and Media
- MEM50212 Diploma of Engineering – Technical
- MEM60112 Advanced Diploma of Engineering
- MSA30208 Certificate III in Manufacturing Technology

Suburb and state of all delivery sites:

- Mt Gravatt, QLD

Third party usage:

- Education agents

Core clients/target groups:

- International students

Training Revenue (Funded or fee for service):

- Fee for service

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

- 86

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 Australian Institute of Advanced Studies Pty Ltd to ASQA.
- Existing information and records held by ASQA concerning Australian Institute of Advanced Studies Pty Ltd.
- Information provided to ASQA's auditors and documentation reviewed during the site audit of Australian Institute of Advanced Studies Pty Ltd conducted on 29 Jan 2020.
- 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	0
<i>CHC33015 Certificate III in Individual Support</i>	Face to face	45
<i>CHC50113 Diploma of Early Childhood Education and Care</i>	Face to face	0
<i>MEM50212 Diploma of Engineering - Technical</i>	Face to face	15
<i>MEM60112 Advanced Diploma of Engineering</i>	Face to face	20

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

## Interviewees

Name	Position	Training products
Noel Higginbotham	CEO/Director	N/A
Pankaj Saxena	Director	MEM50212, MEM60112
Mary-Jane Alexander	Trainer/Assessor	CHC50113, CHC30113
Katherine Alog	Trainer/Assessor	CHC33015

## 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

Australian Institute of Advanced Studies Pty Ltd did not meet the following requirements: Standards for RTOs Clauses 1.3, 1.8, 1.14, 4.1, 5.2 and National Code Standards 1.1, 1.2, 2.1, 3.1, 3.3 and 11.2.

Remedial action is required for the following training products:

- CHC33015 Certificate III in Individual Support

*The organisation is required to provide evidence that demonstrates:*

### **Training and assessment**

*Standards for RTOs Clause 1.3 and National Code Standards 11.2*

- the organisation now has sufficient resources to comply with Standards for RTOs Clause 1.3 and National Code Standard 11.2, proportionate to the number of students enrolled at any time, the mode of delivery, location of delivery, and the strategies for 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:
  - include the full suite of assessment tools (including RPL) for each unit of competency identified as non-compliant
  - demonstrate the organisation will implement an assessment system that ensures assessment:
    - complies with the assessment requirements of the relevant training product(s)
    - will be conducted in accordance with the Principles of Assessment and Rules of evidence.

### *Standards for RTOs Clauses 1.13 – 1.20*

- the organisation now has appropriate processes to ensure it only uses trainers/assessors meet the requirements of the standards to provide training and assessment (Clause 1.13-1.20)
- the trainers/assessors currently used by the organisation meet the requirements of the standards (Clause 1.13-1.20)
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training product sampled that were trained or assessed by a trainer/assessor that did not meet the requirements of the standards. Remedial action needs to cover current students and students who enrolled or completed with your organisation in the past one month.

### **Marketing and recruitment**

#### *Standards for RTOs Clause 4.1 and/or National Code Standards 1.1 and 1.2*

- 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 and National Code Standards 1.1 and 1.2
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students in the training products sampled who received marketing that was not accurate and factual. Remedial action needs to cover current students and students who enrolled with your organisation in the past one month.

### **Enrolment**

#### *Standards for RTOs Clause 5.2 and National Code Standards 2.1, 3.1, 3.3*

- the organisation now has appropriate systems that are followed to ensure each learner is provided with accurate information to enable them to make an informed decision about undertaking training with your organisation that complies with Standards for RTOs Clause 5.2 and National Code Standard 2.1
- the provider now has entered into written agreements with all students that provides clear and accurate information regarding the services offered by the provider, the requirements for maintaining satisfactory course progress, the fees payable and information on refunds, that complies with National Code Standards 3.1 and 3.3.
- the organisation has carried out remedial action to identify and address the impact the non-compliance may have caused to students that were not enrolled in appropriate training products. Remedial action needs to cover current students and students who enrolled with your organisation in the past one month.

## Areas of non-compliance

### Training and Assessment

#### Training Delivery and Assessment

##### 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.

CHC30113 Certificate III in Early Childhood Education and Care (add to scope)

CHC50113 Diploma of Early Childhood Education and Care (add to scope)

- The following evidence was reviewed:
  - Training and assessment strategies
    - CHC30113 Certificate III in Early Childhood Education and Care
    - CHC50113 Diploma of Early Childhood Education and Care
  - Host Employer Information Pack
  - Request for Placement Positions
  - Vocational Placement Agreement
  - Vocational Placement Checklist for Host Employers
- The organisation has not demonstrated it will have access to adequate facilities to support the work-based component for these training products, as outlined in the organisation's documented training and assessment strategies. Specifically, the evidence provided did not demonstrate the suitability of the vocational placement workplace would be determined, with regard to:
  - the age range of children attending the service
  - other resources outlined for each unit of competency in the training and assessment strategy.

### Standards for RTOs Clause 1.3

*Original Finding: Not compliant*

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment;
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and
- d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.

CHC30113 Certificate III in Early Childhood Education and Care (add to scope)

CHC50113 Diploma of Early Childhood Education and Care (add to scope)

- The following evidence was reviewed:
  - Training and assessment strategies
    - CHC30113 Certificate III in Early Childhood Education and Care
    - CHC50113 Diploma of Early Childhood Education and Care
  - Host Employer Information Pack
  - Request for Placement Positions
  - Vocational Placement Agreement
  - Vocational Placement Checklist for Host Employers
  
- The organisation has not demonstrated it will have access to adequate facilities to support the work-based component for these training products, as outlined in the organisation's documented training and assessment strategies. Specifically, the evidence provided did not demonstrate the suitability of the vocational placement workplace would be determined, with regard to:
  - the age range of children attending the service
  - other resources outlined for each unit of competency in the training and assessment strategy.

### Standards for RTOs Clause 1.8

*Original Finding: 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	The individual learner's needs are considered in the assessment process. Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs. 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.
Flexibility	Assessment is flexible to the individual learner by: <ul style="list-style-type: none"><li>• reflecting the learner's needs;</li><li>• assessing competencies held by the learner no matter how or where they have been acquired; and</li></ul>



	<ul style="list-style-type: none"> <li>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.</li> </ul>
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"> <li>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;</li> <li>assessment of knowledge and skills is integrated with their practical application;</li> <li>assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and</li> <li>judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.</li> </ul>
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.
Table 1.8.2 Rules of Evidence	
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 (add to scope)  
 CHC50113 Diploma of Early Childhood Education and Care (add to scope)

- The following evidence was reviewed:
  - CHCECE005 Provide care for babies and toddlers
    - Theory questions
    - Projects
    - Observation Report
    - Third Party Report
  - CHCPRT001 Identify and respond to children and young people at risk
    - Theory questions
    - Projects
    - Observation Report
    - Third Party Report
- The following analysis provides guidance on the areas of non-compliance. Examples of non-compliances are provided however, this is not an exhaustive list. It is the organisation's responsibility to review the assessment system for each unit of competency for all non-compliances identified below and provide evidence:
  - of a revised assessment system for each unit of competency listed above that addresses all requirements of Clause 1.8.
- Validity and Sufficiency - the assessment tools do not address all unit of competency requirements. For example, but not limited to:
  - Performance Evidence:
    - CHCECE005: Assessment tools provided do not record or verify the performance evidence requirement of 'performing the activities outlined in the performance criteria of this unit

during a period of at least 120 hours of work in at least one regulated education and care service.'

- Assessment conditions:
- **CHCPRT001:** The assessment conditions state that 'simulations and scenarios must be used where the full range of contexts and situations cannot be provided in the workplace or may occur only rarely.' The observation report and third party report require the student to demonstrate skills and perform tasks in the workplace, in situations that are not likely to occur for the purposes of assessment. Furthermore, the target cohort for these training products are international and domestic students wishing to gain employment in an early childhood service. Therefore it is unlikely students on vocational placement would be expected to demonstrate these skills in real life situations if the opportunity to do so was presented. For example, but not limited to:
  - 'Work with a range of young children who are victims of, or are at risk of, abuse or neglect'
  - 'You can observe the children and report on their behaviours; or you might interview the children'
  - 'Follow up by asking questions but do not try to force young people to discuss issues with which they are not comfortable.'

## Trainer and assessor competency

### Standards for RTOs Clause 1.14

*Original Finding: Not compliant*

**The RTO's training and assessment is delivered only by persons who have the training and assessment credential specified in Item 2 or Item 3 of Schedule 1.**

#### *CHC33015 Certificate III in Individual Support*

- The following evidence was reviewed:
  - Kerry Higginbotham credentials, including:
    - TAE40110 Certificate IV in Training and Assessment
- The organisation has not demonstrated that the below listed trainer and assessor possess credentials which meet the requirements of Clause 1.14:
  - Kerry Higginbotham
    - The organisation confirmed Kerry conducted training and assessment after 1 July 2019
    - Evidence provided did not include the completion of *TAEASS502 Design and develop assessment tools*.

## Marketing/Recruitment Practices

### Standards for RTOs Clause 4.1

*Original Finding: 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.

### National Code Standard 1.1

*Original Finding: Not 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

*Original Finding: Not 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.

- The following evidence was reviewed:
  - Provider website: <https://aus-ias.edu.au>
    - Marketing flyers
    - Information on courses
  - AIAS International Student Handbook
  - AIAS Student Handbook
  - AIAS CRICOS Course Guide
- The organisation's marketing material does not align with other documented information it has produced. For example, but not limited to:
  - The provider website includes information relating to *CHC33015 Certificate III in Individual Support*, however, the AIAS CRICOS Course Guide does not include this course as an option for international students.
- The organisation's marketing material contains false and/or misleading information. For example, but not limited to:
  - Provider website and marketing flyers include superseded training product *FNS40215 Certificate IV in Bookkeeping*
  - Marketing flyers, AIAS International Student Handbook and AIAS CRICOS Course Guide references incorrect CRICOS course codes for the following training products:
    - BSB30415 Certificate III in Business Administration
    - BSB50215 Diploma of Business
    - CUA51015 Diploma of Screen and Media
- The organisation's marketing material contains false and/or misleading information for prospective students regarding required work-based training. For example, but not limited to:
  - The website, marketing flyers, handbooks and course guides do not include information about the work placement component of at least 120 hours in at least one aged care, home and community, disability or community service organisation for *CHC33015 Certificate III in Individual Support*.

## Enrolment

### Standards for RTOs Clause 5.2

*Original Finding: Not 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.

## National Code Standard 2.1

*Original Finding: Not compliant*

Prior to accepting an overseas student or intending overseas student for enrolment in a course, the registered provider must make comprehensive, current and plain English information available to the overseas student or intending overseas student on:

- 2.1.1 the requirements for an overseas student's acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required, and course credit if applicable
- 2.1.2 the CRICOS course code, course content, modes of study for the course including compulsory online and/or work-based training, placements, other community-based learning and collaborative research training arrangements, and assessment methods
- 2.1.3 course duration and holiday breaks
- 2.1.4 the course qualification, award or other outcomes
- 2.1.5 campus locations and facilities, equipment and learning resources available to students
- 2.1.6 the details of any arrangements with another provider, person or business who will provide the course or part of the course
- 2.1.7 indicative tuition and non-tuition fees, including advice on the potential for changes to fees over the duration of a course, and the registered provider's cancellation and refund policies
- 2.1.8 the grounds on which the overseas student's enrolment may be deferred, suspended or cancelled
- 2.1.9 the ESOS framework, including official Australian Government material or links to this material online
- 2.1.10 where relevant, the policy and process the registered provider has in place for approving the accommodation, support and general welfare arrangements for younger overseas students (in accordance with Standard 5)
- 2.1.11 accommodation options and indicative costs of living in Australia.

- The following evidence was reviewed:
  - Provider website: <https://aus-ias.edu.au>
    - Marketing flyers
    - Information on courses
  - AIAS International Student Handbook
  - AIAS Student Handbook
  - AIAS CRICOS Course Guide
  - AIAS Standard Enrolment Form for international and domestic students
- Review of the organisation's pre-enrolment documentation found that it contains inaccurate information for prospective students regarding its courses and/or education services. For example, but not limited to:
  - Marketing flyers, AIAS International Student Handbook and AIAS CRICOS Course Guide references incorrect CRICOS course codes for the following training products:
    - BSB30415 Certificate III in Business Administration
    - BSB50215 Diploma of Business
    - CUA51015 Diploma of Screen and Media

### National Code Standard 3.1

*Original Finding: Not compliant*

The registered provider must enter into a written agreement with the overseas student or intending overseas student, signed or otherwise accepted by the student, concurrently with or prior to accepting payment of tuition fees or non-tuition fees. A written agreement may take any form provided it meets the requirements of the ESOS Act and the National Code.

### National Code Standard 3.3

*Original Finding: Not compliant*

In addition to all requirements in the ESOS Act, the written agreement must, in plain English:

- 3.3.1 outline the course or courses in which the student is to be enrolled, the expected course start date, the location(s) at which the course will be delivered, the offered modes of study for the course, including compulsory online and/or work-based training, placements, and/or other community-based learning and/or collaborative research training arrangements
- 3.3.2 outline any prerequisites necessary to enter the course or courses, including English language requirements
- 3.3.3 list any conditions imposed on the student's enrolment
- 3.3.4 list all tuition fees payable by the student for the course, the periods to which those tuition fees relate and payment options (including, if permitted under the ESOS Act, that the student may choose to pay more than 50 per cent of their tuition fees before their course commences)
- 3.3.5 provide details of any non-tuition fees the student may incur, including as a result of having their study outcomes reassessed, deferral of study, fees for late payment of tuition fees, or other circumstances in which additional fees may apply
- 3.3.6 set out the circumstances in which personal information about the student may be disclosed by the registered provider, the Commonwealth including the TPS, or state or territory agencies, in accordance with the Privacy Act 1988
- 3.3.7 outline the registered provider's internal and external complaints and appeals processes, in accordance with Standard 10 (Complaints and appeals)
- 3.3.8 state that the student is responsible for keeping a copy of the written agreement as supplied by the registered provider, and receipts of any payments of tuition fees or non-tuition fees
- 3.3.9 only use links to provide supplementary material.

- The following evidence was reviewed:
  - AIAS Letter of offer (written agreement)
- The organisation's written agreement omits the following information required by Standard 3.3 regarding the prospective student's enrolment:
  - Course details including mode of study and work placement arrangements
  - Information on delivery locations
  - Student obligation to keep copies of written agreement and receipts of payments to the provider