



**Australian Government**  
**Australian Skills Quality Authority**

# REPORT

## **Audit report: Brighton Educational Services Pty Ltd**

Date/s of audit: 9 – 10 April 2019

Date report created: 23 May 2019

Date report updated: 15 August 2019

## Organisation details

Organisation's legal name:	Brighton Educational Services Pty Ltd
Trading name/s:	Brighton Institute of Technology
RTO number:	21438
CRICOS number:	02552G

## Audit team

Lead auditor:	BOWDEN, Terence
Auditor/s:	Paul Bunce, Simon Cochaud

## Audit details

Application number/s:	RENVET0004147 and RENCRI0000726	
Audit number:	AUDREC0009219	
Audit reason	Application - renewal (VET and CRICOS)	
Address of site/s visited:	380 Bourke Street, Melbourne VIC 3000	
Date/s of audit:	9-10 April 2019	
Organisation's contact for audit:	Antarpreet Sekhon apsekhon@bit.edu.au	Chief Executive Officer (03) 96421770

## Original finding at time of audit

### Audit finding: Serious non-compliance

Report completed by: BOWDEN, Terence

Practice	Standards for RTOs	National Code	ELICOS Standards	Finding
Marketing/ Recruitment	4.1	1.4, 1.1, 1.2, 1.3		Compliant
Enrolment	5.1, 5.2, 5.3, 7.3	2.1, 2.2, 3.1, 3.3, 3.4, 8.5	P1.2  P3.1	Compliant  Not complaint
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	P6.9, P7.2	Compliant
Training and Assessment	1.8, 1.13-1.18, 1.20	11.1, 8.18, 8.19, 8.20, 8.21	P1.1, P4.1, P5.1, P5.2, P6.4, P6.7, P6.8, P7.3	Compliant
	1.1, 1.2, 1.3	11.2		Not complaint
Completion	3.1		P4.2	Compliant
Regulatory Compliance / Governance	2.3, 2.4, 8.2	4.1, 4.2, 4.3		Compliant

## Audit finding following analysis of additional evidence

Audit finding following analysis of additional evidence provided on 27/06/2019 : **Compliant**

Report completed by: BOWDEN, Terence

Practice	Standards for RTOs	National Code	ELICOS Standards	Finding
Enrolment			P3.1	Compliant
Training and Assessment	1.1, 1.2, 1.3	11.2		Compliant

## Background

Summary of organisation and management structure:

- Brighton Institute of Technology has been a Registered Training Organisation (RTO) since 5 March 2004 and registered on CRICOS since 24 March 2004.
- Mr Antarpreet Sekhon purchased the RTO in 2015 as a business investment, and was the administration manager until 2017 when he became the Chief Executive Officer (CEO). Prior to this the RTO had a number of short term CEOs.
- The management structure consists of the CEO, a compliance manager, two course coordinators, administrative support staff and contracted trainers and assessors.

Condition of Registration

- Administrative Appeals Tribunal (AAT) decision Nos: 2018/2359; 2018/2482; 2019/0292 on 25 January 2019 set aside the decisions with the following agreed requirements between the Brighton Educational Services Pty Ltd (Applicant) and Australian Skills Quality Authority (Respondent)
  - the Applicant has withdrawn its registration for *SIT40416 Certificate IV in Hospitality* at the location 380 Bourke Street (Lvls 1, 2 and Basement), Melbourne Victoria.
  - the Applicant will create and implement a remedial action plan for all assessment conducted during the period 1 June 2017 to 1 June 2018 for the unit of competency *AURLTE005 Diagnose complex faults in light vehicle diesel engines* and the Applicant will:
    - provide the remedial action plan to ASQA within 21 days of the Tribunal's decision; and
    - retain evidence of the implementation of this plan until the finalisation of the re-registration of the Applicant:
  - the Applicant will provide to ASQA copies of all workplace agreements within 21 days of the Tribunal's decision
  - the Applicant will compile a detailed report with respect to action taken for each item in the "Compliance Plan and Schedule" provided to ASQA on 10 January 2019 and retain evidence of this until the finalisation of the re-registration of the Applicant; and
  - the Applicant will create and implement a finalisation plan with respect to the "List of Re-assessment students" provided to ASQA on 10 January 2019 and
    - provide the finalisation plan to ASQA within 21 days of the Tribunal's decision; and
    - retain evidence of the implementation of this plan until the finalisation of the registration of the Applicant.
  - The undertaking of the Applicant to provide a declaration of compliance to ASQA with respect to the kitchen facilities located at 380 Bourke Street (Levels 1, 2 and Basement) in Melbourne Victoria within 21 days of the Tribunal's decision.
- At audit the RTO demonstrated that it was complying with agreed requirements, but has not yet secured suitable training facilities to deliver their automotive qualifications.

Scope of registration

Qualifications:

- *AUR30616 Certificate III in Light Vehicle Mechanical Technology*
- *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

- *AUR50116 Diploma of Automotive Management*
- *BSB42015 Certificate IV in Leadership and Management*
- *BSB51915 Diploma of Leadership and Management*
- *BSB51918 Diploma of Leadership and Management*
- *BSB61015 Advanced Diploma of Leadership and Management*
- *SIT20416 Certificate II in Kitchen Operations*
- *SIT30816 Certificate III in Commercial Cookery*
- *SIT40416 Certificate IV in Hospitality (superseded)*
- *SIT40516 Certificate IV in Commercial Cookery*
- *SIT50416 Diploma of Hospitality Management*
- *SIT60316 Advanced Diploma of Hospitality Management.*

Suburb and state of all delivery locations:

- Melbourne central business district and Thornbury (automotive qualifications).

Third party usage:

- RTO does engage third parties, 53 education agents onshore and offshore.

Core clients/target groups:

- overseas students with student visas – (predominantly from India, Malaysia, Thailand, China).

Training revenue (fee for service):

- student fees.

Total number of current enrolments as at audit date (PRISMS Data as at 9 April 2019):

- 234 (CoEs studying) – 27% of approved CRICOS capacity.

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 Brighton Educational Services Pty Ltd to ASQA
- existing information and records held by ASQA concerning Brighton Educational Services Pty Ltd
- information provided to ASQA's auditors and documentation reviewed during the site audit of Brighton Educational Services Pty Ltd conducted on 9 April and 10 April 2019
- other publically available information including but not limited to, information published on the organisation's and third party websites.

## Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
<i>AUR30616</i>	<i>Certificate III in Light Vehicle Mechanical Technology</i>	Face to Face	7
<i>SIT30816</i>	<i>Certificate III in Commercial Cookery</i>	Face to Face	19
<i>AUR40216</i>	<i>Certificate IV in Automotive Mechanical Diagnosis</i>	Face to Face	5
<i>SIT50416</i>	<i>Diploma of Hospitality Management Diploma</i>	Face to Face	28
<i>076327D</i>	<i>General English</i>	Face to Face	46
<i>BSB61015</i>	<i>Advanced Diploma of Leadership and Management</i>	Face to Face	26

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

## Interviewees

<b>Name</b>	<b>Position</b>	<b>Training products</b>
Antarpreet Sekhon (Preet)	CEO	All
Michael Phillips	Compliance Manager/ Training Manager	All
Andrew Waddell	English course coordinator	ELICOS courses

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## About this Report

This report details findings against the *Standards for Registered Training Organisations 2015* (Standards for RTOs) and/or the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code) and/or the *ELICOS Standards 2018* (ELICOS Standards). 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

Brighton Educational Services Pty Ltd did not meet all requirements for Standards for RTOs Clauses 1.1, 1.2 and 1.3 National Code Standard 11.2, and ELICOS Standard P3.1.

Remedial action is required for the following training products:

- *AUR30616 Certificate III in Light Vehicle Mechanical Technology*
- *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*
- *SIT30816 Certificate III in Commercial Cookery*
- *SIT50416 Diploma of Hospitality Management*
- *BSB61015 Advanced Diploma of Leadership and Management*
- *076327D General English.*

The organisation is required to provide evidence that demonstrates:

Enrolment:

ELICOS Standard P3.1

- ELICOS students are advised of the outcomes to be achieved at the conclusion of the course and of each learning block within the course.

Training and Assessment:

Clauses 1.1 and 1.2

The RTO's documented training and assessment strategies:

- ensure that implementation of the strategies addresses the different needs and requirements of the different groups within the broad target student cohort of overseas students
- contain sufficient information regarding the resources required for delivery of each qualification.
- provide a rationale and explanation about how the amount of training has been determined as sufficient and will enable each learner to gain the skills and knowledge specified by the training product.

Clause 1.3 and National Code Standard 11.2

- the RTO has sufficient resources to comply with Standards for RTOs Clause 1.3, 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.

## Areas of non-compliance

### Enrolment

#### ELICOS Standard P3.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **Compliant***

The provider must have policies and procedures in place to ensure that:

- a) students are placed in a class appropriate to their current language proficiency level, learning goals and learning needs and consistent with their written agreement
- b) where a special need is identified for a student, arrangements are put in place to address the need and support the student to learn effectively
- c) teacher-to-student ratios do not exceed 1:18 per class
- d) students are informed of the outcomes to be achieved from the course and, for each learning block, the learning outcomes for that block.

#### 076327D General English

The following was reviewed in relation to enrolment:

- Enrolment Policy
- ELICOS Learning/work book resources
- Student files – BIT0937, 1312002CT, BIT0791
- Discussion with English language course coordinator, Andrew Waddell

The RTO's ELICOS enrolment practices are not compliant with the requirements of Standard P3.1(d) of *ELICOS Standards 2018* as enrolment records do not confirm that ELICOS students are advised of the outcomes to be achieved at the conclusion of the course and of each learning block within the course.

Evidence of non-compliant enrolment practice includes:

- no record is made of informing ELICOS students of the outcomes to be achieved from the course and, for each learning block, the learning outcomes for that block.

#### *Analysis of additional evidence:*

The following additional evidence was provided and reviewed:

- statements included in the RTO's response, and attached documents
- attachment 1 - ELICOS student handbook, page 8-16
- attachment 2 - ELICOS enrolment procedure, page 2.

The organisation has addressed the non-compliance with Standard 3.1 for current and future students.

## Training and Assessment

### Training Delivery and Assessment

#### Standards for RTOs Clause 1.1

*Original Finding: **Not compliant***

*Finding following additional evidence: **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***

*Finding following additional evidence: **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.

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*

*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

*SIT30816 Certificate III in Commercial Cookery*

*SIT50416 Diploma of Hospitality Management*

*BSB61015 Advanced Diploma of Leadership and Management*

The following was reviewed in relation to the RTO's training and assessment strategies:

- documented training and assessment strategies for the five qualifications listed above
- current timetables for the above qualifications and student attendance records
- sample of student records including, student management system records and paperwork
- commercial cookery work placement agreements
- information provided at interviews with:
  - contractor (Yassain) responsible for coordinating commercial cookery work placements
  - administrative staff (Harman Kaur, Lisa Olsen) regarding student administration, including monitoring attendance and progress
  - commercial cookery trainer (Arashdeep)
  - automotive course coordinator (Michael).

The RTO's documented training and assessment strategies are not compliant with the requirements of Clause 1.1, and 1.2 of the Standards for RTOs as they do not ensure that when implemented the different needs and requirements of the different groups within the broad target student cohort of overseas students, will be addressed.

The evidence fails to confirm that the documented strategies when implemented will enable each student to meet the requirements for each unit of competency in the qualification in which they enroll, because:

- the RTO identifies overseas students as its target group of learners, and further identifies that some students will have previous qualifications, prior knowledge and experience but does not explain how its training and assessment strategy meets the requirements of these students
- the RTO identifies that some students may enroll in a package of qualifications, providing a pathway to higher level qualifications. The RTO does not provide information about the impact that common units of competency included in a package of qualifications, has in terms of student attendance requirements and course duration and consequently student visa requirements.

*SIT30816 Certificate III in Commercial Cookery*

*SIT50416 Diploma of Hospitality Management*

The RTO's training and assessment strategies are not compliant with the requirements of Clause 1.1 as the documented training and assessment strategy and associated delivery schedule does not contain sufficient information regarding the resources required for delivery of the above qualifications. For example:

- the timetables for the above qualifications do not clearly explain the scheduling arrangements that ensure all students enrolled in hospitality qualifications, requiring use of a commercial kitchen, are accommodated in the RTO's training kitchen that has a capacity limited to accommodate 14 students at a time.

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*



#### *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

The RTO's training and assessment strategies are not compliant with the requirements of Clause 1.1 as the resources required for delivery of the above training products, as identified in the documented training and assessment strategy, are not consistent with the requirements of the relevant training package. For example:

- the evidence analysis under Clause 1.3 outlines previously regulatory actions that determined that the facility at Thornbury High School is not adequate or sufficient to be used as a simulated automotive workshop for training and assessment.

#### *BSB61015 Advanced Diploma of Leadership and Management*

The RTO is not compliant with Clause 1.2 of the Standards for RTOs as it has not demonstrated how the proposed total hours are appropriate and will achieve the required rigour and depth of training for the identified student cohort and mode of delivery.

The Australian Qualifications Framework (AQF) volume of learning identifies the notional duration of all activities required for the achievement of the learning outcomes for each qualification type and describes how long a student who does not hold the competencies identified in the relevant units of competency would take to develop all of the required skills and knowledge. 'Volume of learning' includes all teaching, learning and assessment activities that a typical student must undertake to achieve the learning outcomes. For example:

- Advanced Diploma: 1.5 – 2 years (1800 – 2400 hours)

The explanation in the documented training and assessment strategies identifies the particular learning challenges faced by overseas students, yet has determined an amount of training and overall volume of learning for the above qualification below the lower end of the of the AQF guideline for example:

- the course duration is less than 1.5 years and a total volume of 1800 learning hours
- student self-study makes up 30% of the volume of learning hours.

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Analysis of additional evidence:

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*

*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

*SIT30816 Certificate III in Commercial Cookery*

*SIT50416 Diploma of Hospitality Management*

*BSB61015 Advanced Diploma of Leadership and Management*

The following additional evidence was provided and reviewed:

- statements included in the RTO's response, and attached documents
- attachments 3, 4 and 7 training and assessment strategy documents (revised May 2019) for:
  - *SIT30816 Certificate III in Commercial Cookery*
  - *SIT50416 Diploma of Hospitality Management*
  - *BSB61015 Advanced Diploma of Leadership and Management.*
- attachment 5 - timetable for SIT30816 Certificate III in Commercial Cookery
- attachment 6 - kitchen class capacity chart
- attachment 8 - volume of learning analysis
- attachment 9.1 - notification and schedule of extra classes.

The revised training and assessment strategies now include detailed information about strategies to address different needs and requirements of individuals within the broad overseas student cohort. The information is detailed and sufficient to guide implementation and actual practice to ensure current and future compliance.

The RTO has provided sufficient information regarding kitchen resources available to support delivery of *SIT30816 Certificate III in Commercial Cookery* and *SIT50416 Diploma of Hospitality Management* including:

- information detailing the scheduling and timetabling arrangements demonstrating how the training kitchen, with a capacity for 14 students at a time, can accommodate up to 98 students enrolled in *SIT30816 Certificate III in Commercial Cookery*
- evidence that it has packaged common units from the three hospitality qualifications on its scope of registration, that require practical skill development using the training kitchen, into *SIT30816 Certificate III in Commercial Cookery*.

The RTO has revised the *BSB61015 Advanced Diploma of Leadership and Management* training and assessment strategy to have closer alignment with the Australian Qualifications Framework. Significantly, it has increased the amount of training from 1400 hours to 1680 hours, scheduling 24 hours training per week over 70 weeks and reduced the amount of self-study hours from 600 hours to 320 hours.

It has also included an enrollment requirement that students must have an existing AQF level 5 Diploma qualification or higher. The RTO provided evidence that it identified four currently enrolled students who did meet this requirement, and has scheduled additional classes for these students to ensure they had the support necessary to achieve the qualification.

The RTO has demonstrated that it has access to appropriate and sufficient training facilities to deliver, *AUR30616 Certificate III in Light Vehicle Mechanical Technology* and *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*, as detailed in the evidence analysis under Clause 1.3.

The organisation has addressed non-compliance with Clauses 1.1 and 1.2 for current and future students.

#### **National Code Standard 11.2**

**Original Finding: *Not compliant***

**Finding following additional evidence: *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.**

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*

*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

The following was reviewed in relation to adequacy of education resources to deliver automotive qualifications to overseas students:

- evidence as listed under Clause 1.3.

The RTO's practices are not compliant with the requirements of the National Code Standard 11.2(5) as it does not have appropriate or sufficient training facilities to support overseas students undertaking automotive qualifications.

Evidence of non-compliant practice under Clause 1.3 of this report also applies to National Code Standard 11.2.

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*Analysis of additional evidence:*

The RTO has demonstrated that it has access to appropriate and sufficient training facilities to deliver, *AUR30616 Certificate III in Light Vehicle Mechanical Technology* and *AUR40216 Certificate IV in Automotive Mechanical Diagnosis*, as detailed in the evidence analysis under Clause 1.3.

The organisation has addressed the non-compliance with Standard 11.2 for current and future students.

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**Standards for RTOs Clause 1.3**

***Original Finding: Not compliant***

***Finding following additional evidence: 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.**

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*

*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

The following was reviewed in relation to the sufficiency of the learning resources, facilities and equipment to support learners undertaking the above automotive qualifications:

- documented training and assessment strategies for the two qualifications listed above
- Administrative Appeals Tribunal (AAT) decision 25 January 2019
- the RTO's quality and compliance Plan and Schedule January – December 2019
- information provided at audit by CEO and compliance manager (acting automotive course coordinator)
- non-executed Heads of Agreement document regarding the sub-lease of ground floor 11 Munro Street, Port Melbourne.
- Provider Registration and International Student Management System (PRISMS) data as at 15 May 2019.

The RTO is not-complaint with the requirements of Clause 1.3 of the Standards for RTOs as the current facility used as a simulated automotive workshop for training and assessment, is not adequate or sufficient to enable learners to meet the requirements of the above qualifications, and does not meet industry expectations as a simulated workshop.

- A compliance audit in 2017 and subsequent AAT review in 2018 of ASQA's decision to remove part of the RTO's scope of registration, including automotive qualifications, established the unsuitability of the RTO's automotive training facility at Thornbury High School. The agreement between the parties on 25 January 2019, and noted in the AAT decision record, included an agreement by the RTO that it would find a replacement training facility to support delivery of automotive qualifications.

- In January 2019 the RTO advised that it had pursued an alternative facility during 2018 but had not been able to finalise a lease to secure the premises.
- At the time of audit the RTO advised it was still pursuing alternative automotive training facilities but had not yet been able to enter a lease agreement.
- PRISMS data shows that the RTO has re-commenced enrolments in automotive qualifications from February 2019. The evidence demonstrates that the RTO continues to deliver automotive qualifications but does not have a suitable training facility that enables learners to meet all requirements of the qualifications.

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Analysis of additional evidence:

*AUR30616 Certificate III in Light Vehicle Mechanical Technology*

*AUR40216 Certificate IV in Automotive Mechanical Diagnosis*

The RTO provided evidence that it had secured access to a training facility to support the delivery of the automotive qualifications, listed above. This evidence submitted was in the form of application for an additional site to its registration on CRICOS with supporting evidence included in its response to ASQA's notice of intent to make a regulatory decision:

- statements included in the response summary table
- attachment 10 - copy of 5 year standard commercial lease for 95-97 Lorimer Street Docklands, Victoria 3008, commencing on 7 May 2019, specifying; a managing agent, annual rent of \$95,000 and offering further 5 year term(s)
- attachments 11.1 and 11.2 - two tables mapping physical resources and learning resources available for each unit of competency in the qualifications listed above
- attachments 12.1 and 12.4 - copies of invoices dated 20 June 2019 for automotive equipment and resources purchases by the RTO totalling \$13,131
- attachment 12.5 - copies of invoices during May and June 2019 for painting services, installation of security equipment and supply and installation four vehicle hoists, totalling \$49,818
- attachment 13 - notes of industry consultation about equipment and resources requirements at the proposed training facility
- attachment 14 - copy of internal staff notice about decision to cease enrolments in automotive qualifications, dated 14 June 2019.

Further evidence was gathered by the auditor at an inspection of the proposed site at 10 Lorimer Street Docklands, conducted on 18 July 2019, including:

- invoices for purchases of equipment and resources in July 2019 totalling \$8,952
- invoices from a Certified Practising Planner totalling \$8,450, for professional services associated with the RTO's application to meet the requirements of the City of Melbourne Council – Class 9B Occupancy Permit for 100 persons at any given time
- a copy of building permit issued by building surveyor ASPER Pty Ltd and building drawings for changes required under NCC/BCA classification 9b, estimating a cost of \$1,000.

The site visit confirmed the facility is located in an automotive industrial precinct with two buildings previously used as an industrial warehouse/ transport facility and that modifications had been made and relevant appropriate equipment and resources installed. It was noted that further equipment and resources were available to be relocated at the new facility from the RTO's current training facility at Thornbury High School.

The RTO has demonstrated that it now has access to a suitable training facility to deliver automotive qualifications to overseas students and this facility is adequate to accommodate a capacity of 172 students, which is the approved capacity of its current location at Thornbury High School.