

# INSPECTION REPORT

## **Aigburth Training Opportunities**

**25 November 2002**



ADULT LEARNING  
INSPECTORATE

## Grading

Inspectors use a seven-point scale to summarise their judgements about the quality of learning sessions. The descriptors for the seven grades are:

- *grade 1 - excellent*
- *grade 2 - very good*
- *grade 3 - good*
- *grade 4 - satisfactory*
- *grade 5 - unsatisfactory*
- *grade 6 - poor*
- *grade 7 - very poor.*

Inspectors use a five-point scale to summarise their judgements about the quality of provision in occupational/curriculum areas and Jobcentre Plus programmes. The same scale is used to describe the quality of leadership and management, which includes quality assurance and equality of opportunity. The descriptors for the five grades are:

- *grade 1 - outstanding*
- *grade 2 - good*
- *grade 3 - satisfactory*
- *grade 4 - unsatisfactory*
- *grade 5 - very weak.*

The two grading scales relate to each other as follows:

SEVEN-POINT SCALE	FIVE-POINT SCALE
grade 1	grade 1
grade 2	
grade 3	grade 2
grade 4	grade 3
grade 5	grade 4
grade 6	grade 5
grade 7	

## Adult Learning Inspectorate

The Adult Learning Inspectorate (ALI) was established under the provisions of the *Learning and Skills Act 2000* to bring the inspection of all aspects of adult learning and work-based training within the remit of a single inspectorate. The ALI is responsible for inspecting a wide range of government-funded learning, including:

- work-based training for all people over 16
- provision in further education colleges for people aged 19 and over
- **learnirect** provision
- Adult and Community Learning
- training funded by Jobcentre Plus
- education and training in prisons, at the invitation of Her Majesty's Chief Inspector of Prisons.

Inspections are carried out in accordance with the *Common Inspection Framework* by teams of full-time inspectors and part-time associate inspectors who have knowledge of, and experience in, the work which they inspect. All providers are invited to nominate a senior member of their staff to participate in the inspection as a team member.

## Overall judgement

In those cases where the overall judgement is that the provision is adequate, only those aspects of the provision which are less than satisfactory will be reinspected.

Provision will normally be deemed to be inadequate where:

- more than one third of published grades for occupational/curriculum areas, or
- leadership and management are judged to be less than satisfactory

This provision will be subject to a full reinspection.

The final decision as to whether the provision is inadequate rests with the Chief Inspector of Adult Learning. A statement as to whether the provision is adequate or not is included in the summary section of the inspection report.



## SUMMARY

### The provider

Aigburth Training Opportunities is a charity based in Liverpool city centre. It provides work-based learning for young people. Learners work towards national vocational qualifications (NVQs) and foundation and advanced modern apprenticeships in business administration and early-years care and education.

### Overall judgement

The quality of the provision is not adequate to meet the reasonable needs of those receiving it. Training in business administration is satisfactory, but training in early years care and education is unsatisfactory. Leadership and management and quality assurance are unsatisfactory. Equality of opportunity is satisfactory.

### GRADES

Leadership and management	4
Contributory grades:	
Equality of opportunity	3
Quality assurance	4

Business administration, management & professional	3
Contributory grades:	
Work-based learning for young people	3

Health, social care & public services	4
Contributory grades:	
Work-based learning for young people	4

### KEY STRENGTHS

- good internal communication
- effective links with other organisations
- good resources

### **KEY WEAKNESSES**

- weak business planning
- insufficient use of management information
- insufficiently through quality assurance
- inadequate monitoring of equal opportunities in the workplace
- low rates of achievement of modern apprenticeships
- low retention rates
- weak target-setting
- weak recording of learners' progress

### **OTHER IMPROVEMENTS NEEDED**

- reinforcement of equal opportunities in promotional literature
- comprehensive strategies for improvement
- stronger links between on- and off-the-job learning
- better planning in progress reviews
- better key skills training

## THE INSPECTION

1. Five inspectors spent a total of 20 days at Aigburth Training Opportunities (ATO) in November 2002. They visited 10 work placements and interviewed 35 learners and 12 employers. Inspectors carried out 18 interviews with ATO's staff and observed and graded seven learning sessions. They examined learners' portfolios, progress review documents, records of assessments, minutes of meetings, and policies and procedures. They also studied the most recent self-assessment report, which was drafted in June 2002 and updated just before the inspection.

Grades awarded to learning sessions

	Grade 1	Grade 2	Grade 3	Grade 4	Grade 5	Grade 6	Grade 7	Total
Health, social care & public services	0	0	1	6	0	0	0	7
<b>Total</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>0</b>	<b>7</b>

## THE PROVIDER AS A WHOLE

### Context

2. ATO was established in 1978 and has been based in Liverpool city centre for the past six years. The organisation employs nine staff. A further four work-based assessors are employed by work-placement providers. The charity's board of directors is made up of six trustees. The charity has a contract with Greater Merseyside Learning and Skills Council (LSC) to provide foundation and advanced modern apprenticeships in business administration and early years care and education. ATO has 48 learners, of whom two are employed. The rest are in work placements with local companies. All learners attend ATO's training centre each week for training in theory.

3. In May 2002, the unemployment rate in Liverpool was 6.3 per cent, compared with a national average of 3 per cent and a regional average of 3.6 per cent. The 1991 census found that 3.8 per cent of Liverpool's population were from minority ethnic groups, compared with 6.2 per cent nationally and 1.8 per cent across Merseyside. In 2001, the proportion of school leavers in Liverpool achieving five or more general certificates of secondary education (GCSEs) at grade C or above was 35.1 per cent, compared with the national average of 47.9 per cent. Over 80 per cent of young people entering training have fewer than five GCSEs at grade C or above. Only 64 per cent of school leavers continue in further education or training, compared with the national average of 71 per cent.

### Work-based learning for young people

4. Learners have good work placements. They benefit from good learning resources and the support of well-qualified and experienced staff. Target set for learners are often imprecise. Learners' progress is inadequately recorded. In both areas of learning, too few learners achieve their modern apprenticeship frameworks. However, learners in business administration have been making better progress recently. These learners' portfolios of evidence are detailed and well presented.



## LEADERSHIP AND MANAGEMENT

## Grade 4

5. ATO employs four full-time and five part-time staff. Six of these joined ATO in the seven months up to the inspection. The board of directors provides ATO's manager with support and guidance. Four employers have work-based assessors, who work with ATO's staff to assess learners in childcare. ATO has policies on equal opportunities, the environment and health and safety. It also has procedures for managing, providing and assuring the quality of training. ATO produced a self-assessment report in June 2002 and updated it just before the inspection. The charity produced its first self-assessment report in preparation for a Training Standards Council inspection in May 1999.

### STRENGTHS

- good internal communication
- effective links with other organisations
- detailed equal opportunities policies and procedures

### WEAKNESSES

- weak business planning
- lack of targets for staff
- insufficient use of management information
- inadequate monitoring of equal opportunities in the workplace
- no facilities for learners with disabilities
- insufficiently thorough quality assurance
- inadequate self-assessment

### OTHER IMPROVEMENTS NEEDED

- reinforcement of equal opportunities in promotional literature
- comprehensive strategies for improvement

6. Communication within ATO is good. This strength was identified in the self-assessment report. Regular team meetings keep staff up to date about developments within the organisation and introduce them to any changes in procedures. These meetings follow set agendas. The decisions are recorded and progress in implementing them is monitored. Workshops ensure that all staff, including newer staff, understand important policies such as equal opportunities. Trainers, assessors and internal verifiers meet to discuss their work and to review learners' progress. All staff meet at least once a month. Staff also discuss issues with one another as they arise. The directors keep up to date with the charity through regular board meetings. They also call in to offer support between meetings and respond to queries from managers. Staff find managers and directors approachable.

7. ATO has effective links with other organisations. Its work with Connexions has enhanced information and advice for prospective learners. ATO works closely with other local providers of work-based learning, with which it shares good practice in areas such as key skills and policy-making. The charity has worked with the local college of further education and now benefits from using the college's learning resources. Staff have excellent links with local employers. Learners have benefited from better work placements, which often lead to permanent employment.

8. ATO does not have a business plan. It has a financial plan that concentrates on meeting the requirements of the local LSC. There is no system for monitoring performance across ATO or evaluating the various learning programmes. ATO lacks clear long- and short-term objectives for improving learning. A development plan was written in June 2002, after self-assessment. This sets broad goals to improve retention rates. However, it does not specify actions and timescales in any detail. Little has been done to put the plan into action.

9. Staff lack clear targets. All have job descriptions that set out their responsibilities. However, they do not have personal development plans with specific individual targets. Managers focus on day-to-day supervision, particularly that of newer staff. The last staff appraisals took place at the start of 2002. These reviewed the past year and identified staff development needs. They did not identify how staff could contribute towards the charity's goals. Most staff have joined ATO since the last set of appraisals and have not yet been appraised. The charity identified the lack of appraisals as a weakness in its self-assessment report and managers plan to introduce personal development plans and targets for staff.

10. Staff make insufficient use of data to monitor and plan learners' progress. The assessors and internal verifiers hold records, but these are often inaccurate or incomplete. This makes them difficult to collate or analyse. Managers do not have an overview of learners' performance to help them plan and make decisions. Staff consider collating data an administrative process, linked to claiming payments from the local LSC. They do not see it as a way of identifying trends or action that needs to be taken. ATO has recently bought a computerised management information system. However, staff have not yet identified how to make best use of it.

**Equality of opportunity****Contributory grade 3**

11. ATO has a comprehensive equal opportunities statement and detailed policies and procedures, which reflect the latest legislation and best practice. These are regularly reviewed and extended. For example, the charity has recently developed detailed policies on alcohol and substance misuse, HIV and AIDS and dignity at work. All staff have had equal opportunities training. ATO holds further briefings on new policies and procedures as they are introduced. Staff have a sound understanding of equal opportunities. They have a good knowledge of learners' backgrounds and the personal and social difficulties that learners face when entering training. Individual staff work with learners to tackle these difficulties. The charity also funds learners who fail to achieve their qualifications within the period set by the local LSC. This motivates them to continue their training.

12. ATO collects and analyses information on its success in meeting the local LSC's equal opportunities targets. Staff work with the careers service to recruit under-represented groups. The charity has recruited some men into both administration and childcare training. Staff analyse where learners live and are developing strategies to promote training in areas of the city where participation is low. They work hard to secure work placements near learners' homes, to overcome reluctance to travel. However, ATO lacks adequate marketing material. Marketing material is not used to promote equality of opportunity.

13. The monitoring of equal opportunities in the workplace is inadequate. The charity introduces equal opportunities during learners' inductions. Learners have a satisfactory understanding of equal opportunities. However, they do not receive materials explaining terms which will help them understand their rights and responsibilities in the workplace. Some learners have an inadequate understanding of complaints, bullying and harassment at work. Checks on how well learners understand equal opportunities have been incorporated into progress reviews, but the questioning is often cursory. All work-placement providers have equal opportunities policies and most offer learners equal opportunities training. However, ATO's staff rely too heavily on these policies and procedures. ATO has no system to monitor how effective the procedures are. Many learners do not realise that ATO is responsible for monitoring equal opportunities in the workplace and providing support when problems arise.

14. ATO's training centre does not have facilities for learners with mobility difficulties. This was identified as a weakness in the self-assessment report.

## Quality assurance

## Contributory grade 4

15. ATO has comprehensive policies and procedures to assure quality. These have been reviewed recently to make sure they are up to date and that they cover all aspects of training. ATO also has long-established arrangements for internally verifying learners' portfolios. There is a schedule for verifying assessment decisions and observing assessment in the workplace. All assessors and internal verifiers, including the work-based assessors, meet regularly. The internal verifiers have suitable qualifications.

16. ATO lacks adequate arrangements to make sure its policies and procedures are being followed. Procedures lack detail and many do not specify responsibility for implementing or monitoring them. The charity has no schedule of audits to ensure that staff are adhering to its policies and adequately understand procedures that are relevant to their roles. This is particularly serious because many staff are new. There has been some observation of trainers and assessors, but the process is not systematic. Records of some observations are descriptive rather than evaluative and do not lead to clear improvement plans. ATO has arrangements for gathering feedback from learners and employers. However, it does not use the results to make improvements. The questionnaires do not encourage learners to comment in any detail. ATO has recently set up focus groups for learners to express their views directly to staff. However, it is too soon to determine whether this will bring about improvements.

17. Self-assessment is inadequate. The report produced for the inspection was insufficiently self-critical and failed to identify many strengths and weaknesses. The report described training and assessment without fully identifying strengths and weaknesses. This was ATO's third report and its first against the 'Common Inspection Framework'. ATO prepared an action plan after submitting the final draft of the report to the local LSC. However, the action plan did not reflect the content of the self-assessment report. Many of the targets in the action plan are imprecise.

18. ATO's staff are aware of many of the weaknesses identified by inspectors. New staff are particularly keen to remedy these weaknesses. At the time of inspection, ATO had made progress in several important areas. For example, it had devised strategies to increase retention and achievement rates. However, strategies to rectify some weaknesses have not yet been developed. ATO is in the early stages of developing methods of monitoring its improvement strategies.

## AREAS OF LEARNING

### Business administration, management & professional

Grade 3

Programmes inspected	Number of learners	Contributory grade
Work-based learning for young people	9	3

19. Nine foundation modern apprentices are working towards level 2 NVQs in business administration. Their learning programmes last up to 15 months. Two learners are employed and the rest are in work placements. Learners work across the city centre in various office jobs. Learners are recruited by the careers service, from schools, on the recommendation of previous learners, and by direct application. Induction takes place for groups of learners at ATO's training centre. Learners sit an initial assessment, including a basic skills test. Some learners have additional learning and social needs. All learners receive off-the-job training at ATO's premises on one day each week. Learners also receive on-the-job training. ATO's staff visit learners in the workplace every fortnight to carry out assessments and record their progress. Progress reviews take place every 12 weeks. Two of ATO's full-time staff carry out training and assessment. Both are suitably qualified and hold level 3 NVQs in business administration. Both staff have joined ATO within the past three months. A qualified internal verifier works for ATO on a flexible, part-time basis.

The following tables show the achievement and retention rates available up to the time of the inspection.

Work-based learning for young people																
Advanced modern apprenticeships (AMA)																
	2002-03		2001-02		2000-01											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts					1											
Retained*					0	0										
Successfully completed					1	100										
Still in learning					0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

## AIGBURTH TRAINING OPPORTUNITIES

Work-based learning for young people																
Foundation modern apprenticeships (FMA)																
	2002-03		2001-02		2000-01											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts	4		14		1											
Retained*	0		0	0	1	100										
Successfully completed	0		0	0	1	100										
Still in learning	4		5	36	0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

Work-based learning for young people																
NVQ Training																
	2002-03		2001-02		2000-01											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts			4		2											
Retained*			0	0	2	100										
Successfully completed			0	0	2	100										
Still in learning			0	0	0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

## STRENGTHS

- good work placements
- good portfolios
- good resources

## WEAKNESSES

- low achievement rates
- low retention rates
- lack of targets for completing units

## OTHER IMPROVEMENTS NEEDED

- stronger links between on- and off-the-job learning
- better planning in progress reviews

20. Learners have good work placements. They are placed with carefully chosen, supportive organisations. Employers provide a good range of opportunities to gather evidence for the NVQ. They move learners between jobs regularly to give them a broad range of experience. Workplace supervisors are well qualified and provide good on-the-job training. Some have completed NVQs themselves. Learners receive help and advice when carrying out new tasks. Many employers provide extra training that goes beyond the requirements of the NVQ. Employers appreciate learners' contributions and most hope to be able to employ the learners when the work placement ends. Two employers have already done so.

21. Learners' portfolios are neat and contain a good range of evidence. Learners take pride in the portfolios and take responsibility for completing them. Evidence for the NVQ is often cross-referenced to the key skills requirements. Portfolios are individual and include detailed personal statements, which often show a high level of competence. Learners collect evidence from a wide range of day-to-day activities. The good quality of learners' portfolios reflects the range of training offered by employers and the motivation of learners. The quality of learners' portfolios was not identified as a strength in the self-assessment report.

22. ATO has a good range of resources. The training room has sufficient computers with up-to-date software and an extensive range of peripherals. There is a wide range of training materials. The ratio of staff to learners is high. This allows assessors to visit learners frequently in the workplace. It also allows for one-to-one coaching and extra help for learners who need it. The self-assessment report identified the frequency of workplace visits as a strength. It also drew attention to the high ratio of staff to learners.

23. Off-the-job training focuses on key skills. Learning sessions are well planned and the aims of each session are made clear to learners. Many of the activities are practical, matching learners' preferred learning style. Subjects are well covered, but sessions do not take sufficient account of learners' existing understanding and work experience. The subject of each session is made known to learners just one week in advance. Some learners do not receive this information until the day of the session. This made it difficult for employers to link on-the-job training with the training given by ATO. Assessment and internal verification are satisfactory and meet the awarding body's requirements. Workplace supervisors provide effective witness testimony and help learners to produce work they can use as evidence. Assessors have opportunities to observe learners carrying out their day-to-day duties.

24. Retention and achievement rates are low. Of the 19 foundation modern apprentices who have started training since 2000-01, nine are still in training. Only one has achieved the modern apprenticeship. Nine have left without achieving any qualifications. In the past three years, six learners have started training towards NVQs but only two have achieved their NVQ. Progress has been slow in the past. However, the current intake of foundation modern apprentices has been making good progress. Of the nine learners currently in training, one has completed her NVQ and her key skills portfolios and is waiting to take the key skills test. A further three are on course to

## AIGBURTH TRAINING OPPORTUNITIES

complete their modern apprenticeships within the next six months. Two others are making good progress. A further two have been in training less than four weeks. The quality of portfolios has improved, showing high levels of attainment. The self-assessment report identified the lack of success in the key skills examination as contributing to low rates of achievement of modern apprenticeships. Low retention rates were identified as a weakness in the self-assessment report.

25. Individual learning plans have target dates only for completing the overall qualification. Learners are not set targets for completing individual units of their NVQs or key skills awards. Training and assessment plans do not set clear goals. Assessors and learners do not set long-term plans during progress reviews and work-placement providers do not know whether learners are on track to achieve their modern apprenticeships by the target date.

### Good Practice

*One learner has additional support and additional learning needs. ATO's staff have arranged a special taster work placement for the learner, very close to the training centre. Staff in the workplace keep in close contact with the training centre. The learner attends the work placement one day a week and is carrying out tasks that will provide evidence for his NVQ. ATO's staff are assessing the learner with a view to providing a suitable full-time work placement later in training.*



**Health, social care & public services****Grade 4**

<b>Programmes inspected</b>	<b>Number of learners</b>	<b>Contributory grade</b>
Work-based learning for young people	39	4

26. There are 11 advanced modern apprentices and 28 foundation modern apprentices in early years care and education. None are employed. The target time for achieving the advanced modern apprenticeship is 18 months. The target time for achieving the foundation modern apprenticeship is 12 months. Most learners start their training in July or September. They spend four days each week in work placements and one day at ATO's training centre. Assessors visit learners each week to prepare them for assessment and to arrange and carry out assessments. Learners' progress is reviewed every three months in a meeting involving the learner, the workplace supervisor and ATO's early years care and education co-ordinator. The early years care and education team consists of the co-ordinator, who is also an internal verifier and assessor, a tutor for all the off-the-job training and three other assessors, one of whom is also an internal verifier. Apart from the co-ordinator, all these staff are very new to ATO. There are also six qualified work-based assessors. Most learners choose ATO because it offers so much time in the workplace. They prefer this style of learning. A few learners have transferred from college-based courses for this reason. Many were referred by Connexions. Learners receive an induction at ATO's training centre. This covers their programme of learning, health and safety, and equal opportunities. ATO carries out an individual initial assessment of learners' literacy, numeracy and key skills. It uses these to prepare individual learning plans and to plan any additional support. Learners have a four-week probationary period to confirm that the training matches their ability and career aspirations.

The following tables show the achievement and retention rates available up to the time of the inspection.

<b>Work-based learning for young people</b>																
<b>Advanced modern apprenticeships (AMA)</b>																
	<b>2002-03</b>		<b>2001-02</b>		<b>2000-01</b>											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts			9		11											
Retained*			0	0	0	0										
Successfully completed			0	0	0	0										
Still in learning			9	100	2	18										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

## AIGBURTH TRAINING OPPORTUNITIES

Work-based learning for young people																
Foundation modern apprenticeships (FMA)																
	2002-03		2001-02		2000-01											
	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%	No.	%
Number of starts	6		40		31											
Retained*	0		0	0	7	23										
Successfully completed	0		0	0	7	23										
Still in learning	5		23	57	0	0										

\*retained learners are those who have stayed in learning for at least the planned duration of their training programmes, or have successfully completed their programme within the time allowed

### STRENGTHS

- effective communication with work-placement providers
- good resources

### WEAKNESSES

- low retention and achievement rates of modern apprenticeships
- imprecise action plans and targets
- weak recording of learners' progress

### OTHER IMPROVEMENTS NEEDED

- better key skills training
- closer links between off-the-job training and learners' activities at work
- better planning of sampling for internal verification

27. ATO communicates effectively with work-placement providers. Regular visits keep employers up to date with changes in learners' qualifications when difficulties arise, employers find it easy to contact ATO's staff, who act quickly to put things right. Workplace supervisors are fully aware of learners' off-the-job training and the assessments to be carried out. They support learners and keep them informed about their progress in their work placements.

28. Learning resources are good. Although the staff are very new, they bring energy and enthusiasm to their work and recent experience of early years care and education. ATO's training room is bright and airy and large enough for a variety of learning methods. Learners have good work placements, which demonstrate good practice.

Work-placement providers provide a wide range of opportunities for learners to acquire the evidence and skills they need. Over half of the work placements have work-based assessors.

29. Most learners' work is satisfactory and some work is good. ATO has had problems with its key skills training, but has made progress over the past year. Learners' activities in off-the-job training are not always used as evidence towards their qualifications. Most foundation modern apprentices enjoy their off-the-job training and find it relevant to their activities at work. Advanced modern apprentices find it less helpful and their attendance rates are low. Training in theory is not sufficiently related to nursery practice.

30. Achievement and retention rates are low. Of the 20 advanced modern apprentices who started training in 2000-01 and 2001-02, none has achieved the full modern apprenticeship framework. For the same period, only seven of the 71 foundation modern apprentices have achieved the full modern apprenticeship framework. Of the 39 current learners, nine have achieved the NVQ at level 2 and key skills awards in information technology (IT) and communication. These awards need to be confirmed by external moderators, following critical reports in summer 2002. The retention rate for advanced modern apprentices was only 18 per cent in 2000-01, but all nine who started in 2001-02 are still in training. Twenty-four of the 31 foundation modern apprentices who started in 2000-01 left without achieving their modern apprenticeships, as did 17 of the 40 who started in 2001-02. Foundation modern apprentices who achieve their apprenticeship often go on to the advanced modern apprenticeship. Most advanced modern apprentices are offered employment when they achieve their qualifications.

31. Assessors observe learners at work and question them to test their understanding. Assessments are fair and accurate. However, some recording of learners' progress is weak. ATO has now introduced a new form for recording assessments. These are completed appropriately with clear reasons for decisions. Inspectors observed training in using play to develop language and communication. This was effective in helping the learner to apply skills and knowledge to achieve the desired aims. Internal verification has improved and internal verifiers and assessors have started to meet to ensure consistency of standards and practice. However, there is no system for planning the sampling of work.

32. Learners' progress is regularly reviewed. The progress reviews cover all the necessary issues but involve little questioning to check and reinforce learning. Learners' action plans are imprecise and in many cases non-existent. Many do not refer to the previous progress review or set short-term targets. Progress reviews emphasise learners' performance in their work placements at the expense of their overall progress. Learners' files do not contain a clear record of the individual learner's progress. ATO has no data for monitoring the progress of intakes of learners.