

Audit report – VET Quality Framework Continuing registration as a national VET regulator (NVR) registered training organisation

ORGANISATION DETAILS	
Organisation's legal name	CaPTA Group Pty Ltd
Trading name/s	Careers Training Centre
RTO number	40557
CRICOS number	N/A

AUDIT TEAM		
Lead auditor	Judith Keller	
Auditor/s	N/A	
Technical adviser/s	N/A	

AUDIT DETAILS		
Application number/s	N/A	
Audit number/s	1002694	
Audit reason 1	Post initial	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	278 Hartley Street, Portsmith QLD 4870	
Date/s of audit	04/08/2014 & 05/08/2014	
Organisation's contact for audit	Mr Charles Woodward	Director
	chwoodward@capta.com.au	07 4041 9454
NVR standards audited	Selected Standards for Continuing Registration: SNR 15, 16, 17, 18, 20.2, 21.1, 22.2, 22.3, 23.1, 24.1 & 25	

BACKGROUND

The CaPTA Group Pty Ltd is an Australian private company, owned by the Woodward family. In addition to providing accredited training through its registered training organisation, the Careers Training Centre, the CaPTA Group operates a number of tourism attractions and activities in Far North Queensland including Rainforestation Nature Park, Tropic Wings Cairns Tours, Cairns Wildlife Dome, Cairns Zoom, Jungle Tours and Trekking, Australian Butterfly Sanctuary and Wildlife Habitat.

The organisation achieved initial registration as a registered training organisation in December 2012. Its current scope of registration includes one Certificate III level qualification from the ACM10 Animal Care and Management Training Package, and twelve qualifications (Certificate II to Diploma level) from the

SIT12 Tourism, Travel and Hospitality Training Package (in addition to some superseded qualifications currently in transition and teach out).

Training is currently offered on a fee for service basis to school students, existing workers, corporate clients and members of the public. The organisation has also accessed user choice funding since its registration to facilitate the delivery of Certificate III qualifications in hospitality and tourism to school based trainees and trainees.

The majority of training is delivered face to face, with work based training opportunities being provided at CaPTA Group Pty Ltd owned venues and tourism facilities. The organisation's trainers and assessors also deliver hospitality training and assessment within a private school's hospitality trade training centre and facilities, working with a qualified chef to deliver and assess relevant units of competency.

Across all of its operations (both RTO and non-RTO) the CaPTA Group Pty Ltd employs over 200 employees.

The organisation's Chairman indicated that he anticipates significant growth in demand for qualified staff within the hospitality and tourism industry in the Cairns/Port Douglas region, citing future plans for the Aquis Project in the region and a recent upturn in the local tourism/hospitality industry.

Total number of current enrolments in RTO as at audit date: 61

AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
ACM30310	Certificate III in Captive Animals	Face to face, workplace, distance	11
SIT20213	Certificate II in Hospitality	Face to face, workplace, distance, traineeship	0
SIT30112	Certificate III in Tourism	Face to face, workplace, distance, traineeship	11
SIT30713	Certificate III in Hospitality	Face to face, workplace, distance, traineeship	4
SIT50112	Diploma of Travel and Tourism	Face to face, workplace, distance	2
SIT50313	Diploma of Hospitality	Face to face, workplace, distance	0

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

INTERVIEWEES			
Name	Position	Qualification/Course/Unit code/s	
Charles Woodward	Chairman	N/A	
Penny Cleland	Staff Development Manager	ACM30310, SIT20213, SIT30713, SIT50313, SIT30112, SIT50112	

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 05/08/2014: Significant non-compliance

- The level of non-compliance considers the potential for an adverse impact on the quality of training and assessment outcomes for students.
- If non-compliance has been identified, this audit report describes evidence of the non-compliance.
- Refer to notification of non-compliance for information on providing further evidence of compliance.

AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on 18/09/2014: Compliant

AUDIT FINDING BY STANDARD			
Standard	Original finding	Finding following rectification	
SNR 15	Not compliant	Compliant	
SNR 16	Not compliant	Compliant	
SNR 17	Compliant	n/a	
SNR 18	Not compliant	Compliant	
SNR 19	Not audited	n/a	
SNR 20	Compliant	n/a	
SNR 21	Compliant	n/a	
SNR 22	Not compliant	Compliant	
SNR 23/AQF	Not compliant	Compliant	
SNR 24	Not compliant	Compliant	
SNR 25	Compliant	n/a	

- SNR 15 The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:
- 15.1 The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.

Original finding: Compliant Following rectification: n/a

15.2 Strategies for training and assessment meet the requirements of the relevant Training Package or VET accredited course and have been developed through effective consultation with industry.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

SIT20213 Certificate II in Hospitality

SIT30713 Certificate III in Hospitality

SIT30112 Certificate III in Tourism

SIT50313 Diploma of Hospitality

• The integrated 'course structure' outlined in the organisation's training and assessment strategies for the above qualifications did not support that the organisation ensures that all pre-requisite unit requirements are met prior to the assessment of elective units that have identified pre-requisites, as specified in the SIT12 Tourism, Travel and Hospitality Training Package.

In order to become compliant, the organisation is required to:

SIT20213 Certificate II in Hospitality

SIT30713 Certificate III in Hospitality

SIT30112 Certificate III in Tourism

SIT50313 Diploma of Hospitality

Provide revised training and assessment strategies for the above qualifications that
demonstrate how the organisation will ensure that all pre-requisite unit requirements are met
prior to the assessment of elective units that have identified pre-requisites, as specified in the
SIT12 Tourism, Travel and Hospitality Training Package.

Analysis of rectification evidence:

SIT20213 Certificate II in Hospitality SIT30713 Certificate III in Hospitality SIT30112 Certificate III in Tourism SIT50313 Diploma of Hospitality

- The organisation provided revised training and assessment strategy documents and course
 outlines for each of the above qualifications, in addition to a memo dated 10 September 2014
 signed by its trainers and assessors confirming that no units are currently being delivered that
 require completion/ assessment of a pre-requisite unit.
- Review of the evidence found that the organisation had clearly identified units of competency
 with pre-requisite requirements in its training and assessment strategies for the above
 qualifications, and has taken action to ensure that all pre-requisite unit requirements are met
 prior to the assessment of elective units that have identified pre-requisites, as specified in the
 SIT12 Tourism, Travel and Hospitality Training Package.
- It was noted from the evidence provided that the organisation had also updated relevant sections in its student and staff handbooks to include information about the requirement for

students to gain competency in the necessary pre-requisite units, prior to the commencement of training in units with specified pre-requisites.

15.3 Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the Training Package or VET accredited course and the NVR registered training organisation's own training and assessment strategies and are developed through effective consultation with industry.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

SIT30713 Certificate III in Hospitality

SIT50313 Diploma of Hospitality

SIT50112 Diploma of Travel and Tourism

• The non-compliance identified in relation to SNR 15.5 demonstrated the organisation's assessment materials did not meet all of the requirements of the SIT12 Training Package. See SNR 15.5 for details of non-compliance.

In order to become compliant, the organisation is required to:

SIT30713 Certificate III in Hospitality

SIT50313 Diploma of Hospitality

SIT50112 Diploma of Travel and Tourism

 Address the non-compliance identified in relation to SNR 15.5 to demonstrate the organisation's assessment tools meet the requirements of SIT12 Training Package.

Analysis of rectification evidence:

SIT30713 Certificate III in Hospitality

SIT50313 Diploma of Hospitality

SIT50112 Diploma of Travel and Tourism

- The organisation provided rectification evidence that satisfactorily addressed the noncompliance previously identified in relation to SNR 15.5, thereby demonstrating that the organisation's revised assessment tools for the above qualifications meet the requirements of the SIT12 Training Package.
- 15.4 Training and assessment is delivered by trainers and assessors who:
 - (a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors; and
 - (b) have the relevant vocational competencies at least to the level being delivered or assessed; and
 - (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and
 - (d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.

Original finding: Compliant

Following rectification: n/a

15.5 Assessment including Recognition of Prior Learning (RPL):

- (a) meets the requirements of the relevant Training Package or VET accredited course; and
- (b) is conducted in accordance with the principles of assessment and the rules of evidence; and
- (c) meets workplace and, where relevant, regulatory requirements; and
- (d) is systematically validated.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

SIT30713 Certificate III in Hospitality SIT50313 Diploma of Hospitality

SITTTSL305 Process reservations

- Assessment consisted of short answer questions and practical reservation processing activities. A third party report is used to gather evidence of performance in the workplace over a period of time, in accordance with industry standards.
- Analysis of the assessment tools found that they addressed all requirements specified in the SIT12 Tourism, Travel and Hospitality Training Package for unit SITTTSL305 Process reservations. However, review of the demonstration/observation practical assessment instrument found that the assessor instructions did not include sufficiently detailed information about the conduct of the scenario/simulation tasks (in particular, the supporting resources to be used and the specific details of the scenarios) to ensure consistency and reliability in the conduct of the assessment. Additionally, as the performance standards for the same demonstration/observation practical assessment tasks were not clearly defined, it could not be confirmed that sufficient evidence would be collected through the assessment process to support judgements about candidate competency for unit SITTTSL305 Process reservations.

SIT50313 Diploma of Hospitality SIT50112 Diploma of Travel and Tourism

SITXCCS501 Manage quality customer service

- Assessment consisted of short answer questions and a project. A third party report is used to gather evidence of performance in the workplace.
- Analysis of the assessment tools found that the instructions provided for the 'project' assessment did not clearly articulate the actual tasks that candidates are required to undertake or demonstrate, thereby compromising fairness and reliability in the conduct of the assessment and gathering of assessment evidence. Additionally, review of the project assessment instruments found that instructions for three additional questions/tasks included in the assessor guide were not included in the candidate instructions for the same assessment; therefore it could not be ascertained how candidates would be informed of these assessment requirements. Whilst an assessor checklist was provided for the project assessment task it was unclear how the items on the checklist related to the project assessment tasks.
- As the project / practical assessment tasks were not clearly defined in the organisation's
 assessment tools, it could not be confirmed that valid and sufficient evidence would be
 gathered through the assessment process in respect of all of the required skills, critical aspects
 for assessment and evidence required to demonstrate competency (as specified in the SIT12
 Training Package) for unit SITXCCS501 Manage quality customer service.

SIT50112 Diploma of Travel and Tourism

SITXHRM503 Monitor staff performance

- Assessment consisted of short answer questions and a project (incorporating role plays).
- Analysis of the assessment tools found that the organisation's assessment did not fully address all of the requirements specified in the SIT12 Training Package for unit SITXHRM503 Monitor staff performance. In particular, gaps were identified in the assessment of some performance criteria (including but not limited to PC 1.2 Monitor ongoing performance by

maintaining close contact with the workplace and colleagues; PC 1.3 Regularly provide confirming and corrective feedback to colleagues, PC 1.5 Provide recognition and reward for achievements and outstanding performance, 2.1 Identify and investigate performance problems), required skills (including but not limited to planning and organising skills to coordinate regular performance appraisals and coordinate and operate formal counselling sessions, self-management skills to take responsibility for monitoring staff performance), and the critical aspects for assessment and evidence required to demonstrate competency (specifically, evidence of the ability to monitor the day-to-day effectiveness of staff and provide supportive feedback and guidance for improvement, conduct structured performance appraisals and formal counselling sessions for diverse staff members operating at different levels of effectiveness.

As the organisation's assessment did not fully address the assessment requirements specified
in the SIT12 Training Package for the unit, it was not evident that sufficient and valid evidence
would be collected through the assessment process to support judgements about candidate
competency for SITXHRM503 Monitor staff performance.

In order to become compliant, the organisation is required to:

SIT30713 Certificate III in Hospitality

SIT50313 Diploma of Hospitality

SITTTSL305 Process reservations

- Provide evidence to demonstrate how the organisation will ensure that its assessment for the above unit of competency is conducted in accordance with:
 - (i) the principles of assessment particularly with regard to ensuring reliability and consistency in the conduct of the assessment; and
 - (ii) the rules of evidence including ensuring that sufficient evidence of a candidate's specific performance is collected through the assessment process to support judgements about competency.

SIT50313 Diploma of Hospitality SIT50112 Diploma of Travel and Tourism

SITXCCS501 Manage quality customer service

- Provide a revised suite of assessment tools for the above unit of competency that fully address
 the requirements of the SIT12 Training Package including the elements, performance
 criteria, required skills and knowledge, critical aspects for assessment and evidence required
 to demonstrate competency, as defined in the unit of competency.
- The assessment tools must ensure that assessment will be conducted in accordance with the
 principles of assessment and rules of evidence including providing evidence that (i) clear and
 complete information about assessment requirements is provided for both candidates and
 assessors, (ii) assessment will be conducted consistently over time and across a range of
 learners and assessors, and (iii) sufficient evidence will be collected through the assessment
 process to support judgments about candidate competency for the unit.

SIT50112 Diploma of Travel and Tourism

SITXHRM503 Monitor staff performance

- Provide a revised suite of assessment tools for the above unit of competency that fully address the requirements of the SIT12 Training Package – including the elements, performance criteria, required skills and knowledge, critical aspects for assessment and evidence required to demonstrate competency, as defined in the unit of competency.
- The assessment tools must include evidence to demonstrate that assessment for the unit:
 - will be conducted in accordance with the principles of assessment and rules of evidence;
 and
 - meets workplace and, where relevant, regulatory requirements; and
 - is systematically validated.

Analysis of rectification evidence:

SIT30713 Certificate III in Hospitality SIT50313 Diploma of Hospitality

SITTTSL305 Process reservations

- The organisation provided a revised Assessor Guide (version 2.0, September 2014) for the above unit of competency, in addition to answers to the 'checkpoints' (Assessment 1) included in the Futura learner resource to be used by the organisation to support delivery of the unit. A copy of correspondence from two industry representatives was also provided, indicating that industry feedback had been sought by the organisation in the development of the assessment for unit SITTTSL305 Process reservations.
- Review of the revised Assessor Guide found that it contained sufficiently detailed instructions
 for the assessor, in addition to benchmark criteria for candidate responses, to ensure reliability
 and consistency in the conduct of the assessment and the formation of assessment decisions.
- With particular reference to the amended demonstration/observation practical assessment
 tasks, it was noted that the assessor instructions included detailed information about the
 conduct of the scenario/simulation tasks, the supporting resources to be used and the specific
 details of the scenarios. The practical assessment was supported by an Assessor Checklist
 (assessment role play observation marking guide) defining the performance standards for the
 tasks, including a mechanism for gathering evidence of candidate performance.
- Analysis of the revised assessment tools provided by the organisation affirmed that assessment for unit *SITTTSL305 Process reservations* will be conducted in accordance with the principles of assessment and rules of evidence.

SIT50313 Diploma of Hospitality SIT50112 Diploma of Travel and Tourism

SITXCCS501 Manage quality customer service

- The organisation provided a revised Assessor Guide (version 2.0, September) incorporating candidate assessment tasks for the above unit of competency, in addition to answers to the 'checkpoints' included in the Futura learner resource to be used by the organisation to support delivery of the unit. A copy of correspondence from two industry representatives was also provided, indicating that industry feedback had been sought by the organisation in the development of the assessment for unit SITXCCS501 Manage quality customer service.
- Review of the assessment tools confirmed that, collectively, the organisation's assessment fully addresses all of the requirements specified in the SIT12 Training Package for unit SITXCCS501 Manage quality customer service.
- The revised assessment tools were found to contain clear and detailed information about the assessment task requirements for both candidates and assessors. Additionally, the revised Assessor Guide contained benchmark criteria to guide the assessment to candidate responses to the assessment tasks. Analysis of the evidence supported that assessment will be conducted in accordance with the principles of assessment and rules of evidence, particularly with regard to ensuring that assessment will be conducted consistently over time and across a range of learners and assessors, and that sufficient evidence will be collected through the assessment process to support judgement about candidate competency for the unit.

SIT50112 Diploma of Travel and Tourism

SITXHRM503 Monitor staff performance

The organisation provided a revised Assessor Guide (version 2.0, September 2014) for the
above unit of competency. A copy of correspondence from two industry representatives was
also provided, indicating that industry feedback had been sought by the organisation in the
development of the assessment for unit SITXHRM503 Monitor staff performance.

- Review of the assessment tools confirmed that the organisation's assessment fully addresses
 all of the requirements specified in the SIT12 Training Package for unit SITXHRM503 Monitor
 staff performance.
- The revised assessment tools were found to contain clear and detailed information about the assessment task requirements for both candidates and assessors. Additionally, the revised Assessor Guide contained benchmark criteria to guide the assessment to candidate responses to the assessment tasks. Analysis of the evidence supported that assessment will be conducted in accordance with the principles of assessment and rules of evidence, particularly with regard to ensuring that assessment will be conducted consistently over time and across a range of learners and assessors, and that sufficient evidence will be collected through the assessment process to support judgement about candidate competency for SITXHRM503 Monitor staff performance.
- Evidence was provided to support that the organisation had validated the assessment tasks for the unit to ensure that they meet training package requirements.
- SNR 16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:
- 16.1 The NVR registered training organisation establishes the needs of clients, and delivers services to meet these needs.

Original finding: Compliant Following rectification: n/a

16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.

Original finding: Compliant Following rectification: n/a

16.3 Before clients enrol or enter into an agreement, the NVR registered training organisation informs them about the training, assessment and support services to be provided, and about their rights and obligations.

Original finding: Compliant Following rectification: n/a

16.4 Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.

Original finding: Compliant Following rectification: n/a

16.5 Learners receive training, assessment and support services that meet their individual needs.

Original finding: Compliant Following rectification: n/a

16.6 Learners have timely access to current and accurate records of their participation and progress.

Original finding: Not compliant Following rectification: Compliant

Reasons for finding of non-compliance:

• The organisation was unable to provide evidence at audit to support that it informs learners

about how to access to current records of their participation and progress held by the RTO.

In order to become compliant, the organisation is required to:

 Provide evidence to demonstrate how learners are informed of the process for obtaining access to current records of their participation and progress.

Analysis of rectification evidence:

 The organisation provided copies of its revised Student Information Handbooks, which were found to contain information for learners about the process for obtaining access to current records of their participation and progress held by the RTO.

16.7 The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.

Original finding: Compliant

Following rectification: n/a

SNR 17 Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates, as follows:

17.1 The NVR registered training organisation's management of its operations ensures clients receive the services detailed in their agreement with the NVR registered training organisation.

Original finding: Compliant Following rectification: n/a

17.2 The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations.

Original finding: Compliant Following rectification: n/a

17.3 The NVR registered training organisation monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework.

Original finding: Compliant Following rectification: n/a

17.4 The NVR registered training organisation manages records to ensure their accuracy and integrity.

Original finding: Compliant Following rectification: n/a

SNR 18 The NVR registered training organisation has governance arrangements in place as follows:

18.1 The NVR registered training organisation's Chief Executive must ensure that the NVR registered training organisation complies with the VET Quality Framework. This applies to all of the operations within the NVR registered training organisation's scope of registration,

as listed on the National Register.

Original finding: Not compliant Following rectification: Compliant

Reasons for finding of non-compliance:

 As non-compliance was identified at audit, the NVR registered training organisation's Chief Executive has not ensured compliance with the VET Quality Framework across the organisation's scope of registration.

In order to become compliant, the organisation is required to:

 Rectify all of the areas of the non-compliance identified within this report to demonstrate the Chief Executive has ensured compliance with the VET Quality Framework across the organisation's scope of registration.

Analysis of rectification evidence:

- The organisation provided evidence that satisfactorily rectified all areas of non-compliance
 previously identified at audit, thereby demonstrating that the NVR registered training
 organisation's Chief Executive has ensured compliance with the VET Quality Framework
 across the organisation's scope of registration.
- 18.2 The NVR registered training organisation must also explicitly demonstrate how it ensures the decision making of senior management is informed by the experiences of its trainers and assessors.

Original finding: Compliant Following rectification: n/a

SNR 19 Interactions with the National VET Regulator

- 19.1 The NVR registered training organisation must co-operate with the National VET Regulator:
 - (a) in the conduct of audits and the monitoring of its operations;
 - (b) by providing accurate and timely data relevant to measures of its performance;
 - (c) by providing information about significant changes by its operations;
 - (d) by providing information about significant changes to its ownership; and
 - (e) in the retention, archiving, retrieval and transfer of records consistent with National VET Regulator's requirements.

Original finding: Not audited Following rectification: n/a

SNR 20 Compliance with legislation

20.1 The NVR registered training organisation must comply with relevant Commonwealth, State or Territory legislation and regulatory requirements relevant to its operations and its scope of registration.

Original finding: Not audited Following rectification: n/a

20.2 The NVR registered training organisation must ensure that its staff and clients are fully informed of legislative and regulatory requirements that affect their duties or participation in vocational education and training.

Original finding: Compliant Following rectification: n/a

SNR 21 Insurance

21.1 The NVR registered training organisation must hold public liability insurance throughout its registration period.

Original finding: Compliant Following rectification: n/a

SNR 22 Financial management

22.1 The NVR registered training organisation must be able to demonstrate to the National VET Regulator, on request, that it is financially viable at all times during the period of its registration.

Original finding: Not audited Following rectification: n/a

- 22.2 The NVR registered training organisation must provide the following fee information to each client:
 - (a) the total amount of all fees including course fees, administration fees, materials fees and any other charges:
 - (b) payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee;
 - (c) the nature of the guarantee given by the NVR registered training organisation to complete the training and/or assessment once the student has commenced study in their chosen qualification or course;
 - (d) the fees and charges for additional services, including such items as issuance of a replacement qualification testamur and the options available to students who are deemed not yet competent on completion of training and assessment; and
 - (e) the organisation's refund policy.

Original finding: Not compliant Following rectification: Compliant

Reasons for finding of non-compliance:

 Review of the organisation's student information handbooks and corresponding flyers for distribution to prospective clients found that they contained conflicting information about the organisation's refund policy. Therefore, it was not evident that the organisation provides clear and consistent information about its refund policy to clients and prospective clients.

In order to become compliant, the organisation is required to:

 Provide evidence to demonstrate that all information provided to clients about refunds is clear, and consistent with the organisation's refund policy.

Analysis of rectification evidence:

- The organisation provided:
 - revised Student Handbooks
 - Fees, Charges and Refund Policy
 - Cancellation Policy and Procedure
 - revised advertising material containing specific refund information and links to the organisation's website to access a copy of the Student Handbook containing details of the

refund and withdrawal policy.

- Analysis of the evidence confirmed that the information provided to prospective clients about refunds via the organisation's revised Student Handbooks, advertising material and website was clear and consistent with refund information contained in the organisation's documented 'Fees, Charges and Refund Policy', and 'Cancellation Policy and Procedure'.
- 22.3 Where the NVR registered training organisation collects student fees in advance it must ensure it complies with one of the following acceptable options:
 - (a) (Option 1) the NVR registered training organisation is administered by a State, Territory or Commonwealth government agency;
 - (b) (Option 2) the NVR registered training organisation holds current membership of an approved Tuition Assurance Scheme;
 - (c) (Option 3) the NVR registered training organisation may accept payment of no more than \$1000 from each individual student prior to the commencement of the course. Following course commencement, the NVR registered training organisation may require payment of additional fees in advance from the student but only such that at any given time, the total amount required to be paid which is attributable to tuition or other services yet to be delivered to the student does not exceed \$1,500;
 - (d) (Option 4) the NVR registered training organisation holds an unconditional financial guarantee from a bank operating in Australia for no less than the full amount of funds held by the NVR registered training organisation which are prepayments from students (or future students) for tuition to be provided by the NVR registered training organisation to those students; or
 - (e) (Option 5) the NVR registered training organisation has alternative fee protection measures of equal rigour approved by the National VET Regulator.

Original finding: Compliant Following rectification: n/a

SNR 23 Certification, issuing and recognition of qualifications & statements of attainment

- 23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:
 - (a) meets the Australian Qualifications Framework (AQF) requirements;
 - (b) identifies the NVR registered training organisation by its national provider number from the National Register and
 - (c) includes the NRT logo in accordance with its current conditions of use.

Original finding: Not compliant Following rectification: Compliant

Reasons for finding of non-compliance:

- The sample qualification testamur and sample statement of attainment provided by the organisation did not identify the RTO (as the issuing organisation) by its legal name.
- The sample record of results and sample statement of attainment provided by the organisation did not correctly reflect Australian Qualifications Framework (AQF) specifications for such documents, in that both documents contained the AQF logo.

Analysis of rectification evidence provided at audit, prior to the issuance of the audit report:

 The organisation provided amended sample certification documents - including qualification testamur, record of results, and statement of attainment - at audit that met the requirements of the AQF Qualifications Framework and current policy on the application of the Australian Qualifications Framework Issuance Policy within the VET Sector. No further evidence of rectification is required.

23.2 The NVR registered training organisation must recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.

Original finding: Not audited Following rectification: n/a

23.3 The NVR registered training organisation must retain client records of attainment of units of competency and qualifications for a period of 30 years.

Original finding: Not audited Following rectification: n/a

23.4 The NVR registered training organisation must provide returns of its client records of attainment of units of competency and VET qualifications to the National VET Regulator on a regular basis, as determined by the National VET Regulator. [no requirements currently exist]

This element was not audited.

23.5 The NVR registered training organisation must meet the requirements for implementation of a national unique student identifier. [no requirements currently exist]

This element was not audited.

SNR 24 Accuracy and integrity of marketing

24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

Original finding: Not compliant Following rectification: Compliant

Reasons for finding of non-compliance:

 Review of the organisation's marketing flyers and brochures found that they contained inaccurate information about the organisation's refund policy - refer to SNR 22.2

In order to become compliant, the organisation is required to:

Provide evidence to demonstrate that the organisation's marketing and advertising of its
qualifications to prospective clients contains information that is accurate.

Analysis of rectification evidence:

- The organisation provided revised marketing and pre-enrolment materials that contained accurate information about the organisation's refund policy (see SNR 22.2), thereby demonstrating that the organisation's marketing and advertising of its qualifications to prospective clients contains information that is accurate.
- 24.2 The NVR registered training organisation must use the NRT logo only in accordance with its conditions of use.

Original finding: Not audited Following rectification: n/a



25.1 The NVR registered training organisation must manage the transition from superseded Training Packages within 12 months of their publication on the National Register so that it delivers only currently endorsed Training Packages.

Original finding: Compliant Following rectification: n/a

25.2 The NVR registered training organisation must manage the transition from superseded VET accredited courses so that it delivers only currently endorsed Training Packages or currently VET accredited courses.

Original finding: Compliant Following rectification: n/a