



Audit report – VET Quality Framework

Initial registration as a national VET regulator (NVR) registered training organisation

ORGANISATION DETAILS

Organisation's legal name	Victorian Arabic Social Services Inc
Trading name/s	VASS College of Vocational Education

AUDIT TEAM

Lead auditor	Gail Morley
Auditor/s	NA
Technical adviser/s	NA

AUDIT DETAILS

Application number/s	1051591	
Audit number/s	1004986	
Address of site/s visited	C1, 1-13 The Gateway BROADMEADOWS, VIC, 3047	
Date/s of audit	12/03/2014 - 13/03/2014	
Organisation's contact for audit	Leila Alloush	Chief Executive Officer
	mail@vass.org.au	03 9359 2861
NVR standards audited	All Standards for Initial Registration	

BACKGROUND

- Victorian Arabic Social Services is a community-based organisation, addressing the social, cultural and welfare needs of the Arabic-speaking community. The organisation provides multicultural leadership training, counselling, family, aged care, refugee and youth services. Their aim in establishing a RTO is to provide their community with training opportunities which are flexible and tailored to their needs.
- The proposed delivery model for the one qualification which they have applied for is for theory training and assessment to be provided at VASS College, to a group of maximum 20 students. This is to be followed by mandatory work experience to be provided through a network of childcare centres. They propose to initially operate as a fee-for-service provider, but will seek government funds when established.
- The applicant proposes an auspicing relationship with a similar community centre in Sydney, NSW.
- Prior to the site audit, the applicant advised it wished to amend its application and withdraw all but one qualification from its intended scope of registration.

AUDIT SAMPLE

Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*
CHC30113	Certificate III in Early Childhood	Face to face

Education and Care

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

INTERVIEWEES

Name	Position	Qualification/Course/Unit code/s
Leila Alloush	CEO/Owner	
Andrew Ford	RTO Consultant	
Kawthar Yakan	Administration Coordinator	
Evelyn Dowling	RTO Support	
Malileh Saudi	Administration Support	
Ola Ouda	Trainer/assessor	CHC30113 Certificate III in Early Childhood Education and Care

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 19/03/2014: 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 22/04/2014: Compliant

AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 4	Not compliant	Compliant
SNR 5	Not compliant	Compliant
SNR 6	Not compliant	Compliant
SNR 7	Not compliant	Compliant
SNR 8	Compliant	n/a
SNR 9	Not compliant	Compliant
SNR 10	Compliant	n/a
SNR 11	Not compliant	Compliant
SNR 12/AQF	Compliant	n/a
SNR 13	Compliant	n/a
SNR 14	Not compliant	Compliant

1. The Australian Skills Quality Authority (ASQA) is a government agency responsible for regulating the quality of vocational education and training (VET) providers and their students. ASQA is a statutory body established under the Skills Quality Act 2009 (Vic). ASQA's primary role is to ensure that VET providers meet the standards set out in the Australian Skills Quality Standard (ASQs). ASQA also monitors and reports on the performance of VET providers and their students. ASQA is a key stakeholder in the VET sector and is responsible for ensuring that the sector is of high quality and meets the needs of employers and students. ASQA is a government agency and is not a private company. ASQA is a statutory body established under the Skills Quality Act 2009 (Vic). ASQA's primary role is to ensure that VET providers meet the standards set out in the Australian Skills Quality Standard (ASQs). ASQA also monitors and reports on the performance of VET providers and their students. ASQA is a key stakeholder in the VET sector and is responsible for ensuring that the sector is of high quality and meets the needs of employers and students. ASQA is a government agency and is not a private company.

SNR 4 The applicant must have strategies in place to provide quality training and assessment across all of its operations as follows:

4.1	The applicant has a defined continuous improvement strategy that requires the collection and analysis of data. The strategy includes implementation of continuous improvement activities for training and assessment.
Original finding: Compliant	Following rectification: n/a

4.2	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:

CHC30113 Certificate III in Early Childhood Education and Care

The organisation provided a training and assessment strategy for the qualification. The strategy did not identify the physical resources (facilities, equipment etc.) which will be required to be used for the delivery of training and assessment required by each unit. Furthermore, evidence was not provided that the strategy had been developed through effective consultation with industry.

In addition, the strategy did not demonstrate how students would be supported to complete the qualification in the proposed delivery hours, which were significantly shorter than the nominal hours for the qualification, and the hours specified in the purchased learning and assessment materials.

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

CHC30113 Certificate III in Early Childhood Education and Care

Provide a revised training and assessment strategy for the above qualification that:

- provides a framework to guide trainers and assessors in the learning requirements and the teaching, training and assessment arrangements of the qualification i.e. the macro level requirements of the learning and assessment process.
- identifies how assessment processes will assess the requirements of units of competency
- identifies the physical resources to be used to deliver and assess the qualification
- identifies how students will be assisted to successfully complete the qualification within the specified time for delivery and assessment (scheduling and course structure).

The organisation is further required to provide evidence that each strategy has been developed through effective consultation with industry and evidence of how the feedback contributed to the development of its strategy.

Analysis of rectification evidence:

The applicant provided a revised Training and Assessment Strategy for CHC30113 Certificate III in Early Childhood Education and Care. The revised strategy included more detail in relation to physical resources, student support, scheduling and assessment. Industry consultation had been undertaken and positive recommendations had been made, including increased hours of delivery, which were reflected in the strategy. The evidence provided demonstrates compliance with requirements of SNR 4.2.

4.3 Staff, facilities, equipment, and training and assessment materials to be used by the applicant meet the requirements of the Training Package or VET accredited course and the applicant'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:

The evidence provided does not support compliance with the requirements for SNR 4.3.

Facilities and equipment

CHC30113 Certificate III in Early Childhood Education and Care

The organisation did not provide evidence to demonstrate it has suitable equipment available for the delivery of the qualification which meets the requirements of the training package, qualification and units of competency and are consistent its own training and assessment strategy.

Staff

As non-compliance has been identified against SNR 4.4, this standard is also considered non-compliant as the applicant didn't demonstrate it has access to trainers/assessors that meet the requirements of the training package.

Assessment materials

As non-compliance has been identified against SNR 4.5, this standard is also considered non-compliant as the applicant didn't demonstrate its assessment material meet the requirements of the training package.

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

Facilities and equipment

CHC30113 Certificate III in Early Childhood Education and Care

Provide evidence to demonstrate that it is sufficiently resourced and has suitable equipment available for the delivery of the qualification, which meets the requirements of the training package (qualification and units of competency), are consistent with its own training and assessment strategy and are appropriate for the proposed target group.

Staff

The provision of rectification evidence to address the non-compliance identified against SNR 4.4, should it be determined compliant, will address the requirements of this standard. Therefore no further evidence is required to address this standard directly.

Assessment materials

The provision of rectification evidence to address the non-compliance identified against SNR 4.5, should it be determined compliant, will address the requirements of this standard. Therefore no further evidence is required to address this standard directly.

Analysis of rectification evidence:

- Resources: the applicant provided evidence that appropriate physical resources had been purchased for delivery of the proposed qualification.
- The provision of rectification evidence to address the non-compliance identified against SNR

4.4, has been determined compliant and therefore satisfies the requirements of this standard.

- The provision of rectification evidence to address the non-compliance identified against SNR 4.5, has been determined compliant and therefore satisfies the requirements of this standard.

4.4	<p>The applicant has a defined strategy, procedures and measures to ensure training and assessment services are conducted by trainers and assessors who:</p> <p>(a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors;</p> <p>(b) have the relevant vocational competencies at least to the level being delivered or assessed;</p> <p>(c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and</p> <p>(d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.</p>
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Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- Ola Ouda, Lubna Jajo, Zaynab Abulwahed (CHC30113 Certificate III in Early Childhood Education and Care)

For the nominated trainers/assessors listed above, the applicant provided evidence they hold superseded VET qualifications to demonstrate vocational competency; however, no evidence was provided to demonstrate how it has established and substantiated the trainers and assessors hold relevant vocational competence to deliver CHC30113 Certificate III in Early Childhood Education and Care as the previous qualifications have been identified as not equivalent in the CHC training package.

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

Ola Ouda, Lubna Jajo, Zaynab Abulwahed (CHC30113 Certificate III in Early Childhood Education and Care)

For the trainers/assessors listed, provide evidence to demonstrate how it has established and substantiated the trainers and assessors are vocationally competent to deliver CHC30113 Certificate III in Early Childhood Education and Care. If it is found the trainers/assessors cannot demonstrate they are vocationally competent, the applicant is to provide evidence it has developed a strategy which will ensure the trainers/assessors will become vocationally competent at least to the level of the qualification being delivered and assessed.

Analysis of rectification evidence:

- The applicant provided an amended policy and procedure in relation to recruitment and appointment of staff, which included a process for verifying vocational competence.
- Also provided was a mapping document for trainers and assessors to record vocational competence, and a completed mapping document for Zaynab Abulwahed, which demonstrated the required vocational competence to deliver and assess the proposed qualification.

The evidence provided supports compliance with the requirements of SNR 4.4.

- 4.5 The applicant has a defined strategy and procedures in place to ensure that assessment, including Recognition of Prior Learning (RPL):**
- (a) will meet the requirements of the relevant Training Package or VET accredited course;**
 - (b) will be conducted in accordance with the principles of assessment and the rules of evidence;**
 - (c) will meet workplace and, where relevant, regulatory requirements; and**
 - (d) is systematically validated.**

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

CHC30113 Certificate III in Early Childhood Education and Care

CHCECE005 Provide care for babies and toddlers

CHCECE009 Use an approved learning framework to guide practice

- The assessment tools/tasks/activities provided for the units listed and contained within the 'Aspire' purchased resources did not include criteria defining acceptable level of performance which students would be required to demonstrate and to enable assessors to reach a decision about competence that will be consistent and can be substantiated.
- Furthermore, the assessment tasks/activities/tools did not contain clear information about the assessment requirements for students and assessors.

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

CHC30113 Certificate III in Early Childhood Education and Care

CHCECE005 Provide care for babies and toddlers

CHCECE009 Use an approved learning framework to guide practice

- Provide evidence to demonstrate all of its assessment activities/tasks/tools for the units listed, include or are accompanied with clear instructions which provides guidance to students, assessors and third parties of the assessment requirements, including but not limited to:
 - the context and purpose of assessment,
 - how and when assessment is to be conducted and submitted
 - under what conditions will assessment be conducted and/or completed
 - how assessment will be recorded.
- Provide evidence to demonstrate it has access to and/or developed assessment criteria which defines and provides guidance to the assessor of the acceptable level of performance required to be demonstrated by students for all assessment tools/activities/tasks to ensure training package, qualification and units of competency requirements are met; will ensure consistency in the judgements made across assessors/students and decisions of competence can be substantiated.

Analysis of rectification evidence:

CHC30113 Certificate III in Early Childhood Education and Care

CHCECE005 Provide care for babies and toddlers

CHCECE009 Use an approved learning framework to guide practice

- The evidence provided demonstrates the applicant's assessment activities/tasks/tools for the units listed, include or are accompanied with clear instructions which provide guidance to students, assessors and third parties of the assessment requirements.

- The evidence provided demonstrates the applicant has access to and has developed assessment criteria which defines and provides guidance to the assessor of the acceptable level of performance required to be demonstrated by students for all assessment tools/activities/tasks to ensure training package, qualification and units of competency requirements are met; will ensure consistency in the judgements made across assessors/students and decisions of competence can be substantiated.

SNR 5 The applicant must have strategies in place to adhere to the principles of access and equity and to maximise outcomes for its clients, as follows:

5.1 The applicant has a strategy in place detailing how it will establish and meet the needs of its clients.

Original finding: Compliant

Following rectification: n/a

5.2 The applicant has a strategy in place for the implementation of continuous improvement of client services informed by the analysis of relevant data.

Original finding: Compliant

Following rectification: n/a

5.3 The applicant has in place a process and mechanism to provide all clients information about the training, assessment and support services to be provided, and about their rights and obligations, prior to enrolment or entering into an agreement.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- Accurate and comprehensive information about fees, refunds and client rights was not included in the nominated mechanism (Student Handbook 2014).

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

- provide evidence that potential clients will have access to accurate and comprehensive information about fees, refunds and their rights prior to enrolling or entering into an agreement.

Analysis of rectification evidence:

The applicant provided:

- a revised course brochure
- a revised course fee policy, covering fees paid in advance
- a policy outlining their obligations to students
- a student refund policy
- an amended Student Handbook 2014

The evidence provided demonstrates that potential clients will have access to accurate and comprehensive information about fees, refunds and their rights prior to enrolling or entering into an agreement.

5.4 Where identified in the learning and assessment strategy, the applicant has engaged or has a defined strategy in place to engage with employers or other parties who contribute to each learner's training and assessment on the development, delivery and monitoring of training and assessment.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The applicant will be delivering training and assessment in childcare centres, however there was no evidence provided as to how the applicant has engaged or intends to engage with employers or other workplace personnel who contribute to the development, delivery and monitoring of learners' training and assessment.

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

- provide a defined strategy detailing how the applicant will engage with employers and other parties that contribute to each learner's training and assessment in the development, delivery and monitoring of training and assessment.

Analysis of rectification evidence:

The applicant provided:

- a Partnership Agreement Template
- A Workplace Supervisor Manual.

The evidence provided demonstrates the applicant has a defined strategy detailing how the applicant will engage with employers and other parties that contribute to each learner's training and assessment in the development, delivery and monitoring of training and assessment.

5.5 The applicant has a defined process and mechanism in place to ensure learners receive training, assessment and support services that meet their individual needs.

Original finding: Compliant

Following rectification: n/a

5.6 The applicant has a defined process and mechanism in place to ensure learners have timely access to current and accurate records of their participation.

Original finding: Compliant

Following rectification: n/a

5.7 The applicant has a defined complaints and appeals process that will ensure learners' complaints and appeals are addressed effectively and efficiently.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation provided a Grievance Policy and Procedure, the provisions of which covered both staff and students. The procedure did not demonstrate that complaints and appeals will be addressed effectively and efficiently because the procedures for addressing these were very complex and were generally inappropriate to address complaints and appeals from learners.

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

- Provide amended or additional processes that will ensure complaints and appeals from learners will be addressed effectively and efficiently and how students and staff will be

informed of these processes.

Analysis of rectification evidence:

The applicant provided:

- an amended Student Handbook 2014
- an amended Grievance Policy and Procedure.

The evidence provided demonstrates the applicant will ensure complaints and appeals from learners will be addressed effectively and efficiently and how students and staff will be informed of these processes.

SNR 6 The applicant must have in place management systems that will be responsive to the needs of clients, staff and stakeholders, and the environment in which the RTO will operate, as follows:

6.1 The applicant has a strategy in place detailing how the management of its operations will ensure clients receive the services detailed in their agreement with the applicant.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The applicant provided a Student Acceptance Agreement which committed the client but did not include any commitment from the organisation in relation to the services to be provided.

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

- provide evidence of how, through the management of its operations, it will be ensured that clients will receive the services detailed in their agreement with the applicant.

Analysis of rectification evidence:

The applicant provided:

- a policy outlining their obligations to students
- an amended Student Handbook 2014.

The above evidence supports compliance with the requirements of SNR 6.1.

6.2 The applicant has a defined strategy for the implementation of a systematic continuous improvement approach to the management of operations.

Original finding: Compliant

Following rectification: n/a

6.3 Where applicable, the applicant has a defined process and mechanism to monitor training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The applicant provided a Partnership Agreement which covered the provision of work placements and training with other organisations. The agreement did not include a process and mechanism to monitor training and assessment services provided on the applicant's behalf, to ensure these services comply with the VET Quality Framework.

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

- provide evidence that it has arrangements to monitor training and assessment provided on its behalf by other organisations, and that the monitoring arrangements will ensure compliance with all aspects of the VET Quality Framework.

Analysis of rectification evidence:

The applicant provided:

- a revised Partnership Agreement template which included a process and mechanism for monitoring training and assessment services provided on their behalf.

The evidence provided demonstrates the applicant has arrangements and processes in place to monitor training and assessment provided on its behalf by other organisations, and that the monitoring arrangements will ensure compliance with all aspects of the VET Quality Framework.

6.4 The applicant has a defined strategy and process to manage records to ensure their accuracy and integrity.

Original finding: Compliant

Following rectification: n/a

SNR 7 The applicant has adequate governance arrangements, as follows:

7.1 The applicant must demonstrate to the National VET Regulator;
(a) what its intended objectives as an RTO are;
(b) that it has undertaken business planning; and
(c) the continuing viability, including financial viability, of its proposed operations.

Original finding: Compliant

Following rectification: n/a

7.2 The applicant must also demonstrate how it will ensure the decision making of senior management is informed by the experiences of its trainers and assessors.

Original finding: Compliant

Following rectification: n/a

7.3 The applicant's Chief Executive must identify how he or she will ensure that it will comply with the VET Quality Framework and any national guidelines approved by the National Skills Standards Council or its successors. This applies to all of the operations within the applicant's intended scope of operation.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not provide any evidence to demonstrate how the Chief Executive will ensure the organisation will comply with the VET Quality Framework and other requirements which applies to its operations and intended scope of registration at all times.
- As non-compliance has been identified with against other SNR Standards, the applicant has not ensured compliance with VET Quality Framework.

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

- Provide evidence to demonstrate how the Chief Executive will ensure the organisation will comply with all requirements of the VET Quality Framework and any national guidelines approved by the NSSC which applies to its operations and intended scope of registration.
- The provision of rectification evidence to address the identified non-compliance against other SNR standards within this report, should they be determined compliant, will satisfy the requirements of this standard.

Analysis of rectification evidence:

In addition to the provision of rectification evidence addressing other standards in this report, the applicant provided a Legislation, Compliance and RTO Standards Policy and Procedure, which outlines the role of the CEO in ensuring compliance with the VET Quality Framework and relevant national guidelines.

The evidence demonstrates that, once the identified processes are fully implemented, the Chief Executive will ensure the organisation will comply with the relevant requirements.

SNR 8 Interactions with the National VET Regulator

8.1 The application for initial registration must be accompanied by a self-assessment report of the applicant's compliance with the VET Quality Framework.

Original finding: Compliant

Following rectification: n/a

8.2 The applicant's chief executive must identify how it will ensure that the applicant will 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 to 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: Compliant

Following rectification: n/a

SNR 9 Compliance with legislation

9.1 The applicant must identify how it will comply with relevant Commonwealth, State or Territory legislation and regulatory requirements relevant to its intended operations and its intended scope of registration.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The applicant had not identified the legislation that relates to its operations and had not identified how it would comply with relevant legislative and regulatory requirements relevant to its intended operations and its intended scope of registration.

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

- Provide evidence to demonstrate how it will comply with relevant Commonwealth, State or Territory legislation and regulatory requirements relevant to its intended operations and scope of registration.

Analysis of rectification evidence:

The applicant provided:

- a Legislation, Compliance and RTO Standards policy which identified relevant legislation and outlined a strategy for ongoing compliance
- amended Staff Manual, which included relevant legislative and regulatory information.

The evidence provided demonstrates how the applicant will comply with relevant Commonwealth, State or Territory legislation and regulatory requirements relevant to its intended operations and scope of registration.

9.2 The applicant must identify how it will inform staff and clients of the legislative and regulatory requirements that affect their duties or participation in vocational education and training.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The applicant provided a 'Staff Manual 2014', which included references to regulatory/legislative websites, many of which were out of date. This does not meet the requirements of this standard for fully informing clients and students of the requirements that affect their duties or participation in vocational education and training.

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

- Provide evidence to demonstrate that its mechanisms to inform staff and clients legislative and regulatory requirements that affect their duties or participation in vocational education and training are accurate and current.

Analysis of rectification evidence:

The applicant provided:

- a Legislation, Compliance and RTO Standards policy which identified relevant legislation and outlined a strategy for ongoing compliance and currency
- amended Staff Manual, which included relevant current legislative and regulatory information
- amended Student Handbook 2014, which included adequate information for students about regulatory and legislative requirements.

The evidence provided demonstrates the applicants' mechanisms to inform staff and clients legislative and regulatory requirements that affect their duties or participation in vocational education and training are accurate and current.

SNR 10 Insurance

10.1 The applicant must hold public liability insurance.

Original finding: Compliant

Following rectification: n/a

SNR 11 Financial management for initial registration

11.1 The applicant must be able to demonstrate to the National VET Regulator, on request, that it will be financially viable at all times during the period of its registration.

Original finding: Compliant

Following rectification: n/a

11.2 The applicant must identify how it will provide the following fee information necessary for continuing registration, 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 RTO 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 applicant's refund policy.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

The applicant provided the following which included some fee information:

- student handbook
- draft brochures/fliers
- refund policy.

The fee information to be provided to clients did not include the following:

- a breakdown of the total amount of all fees
- payment terms which align with the chosen strategy for the protection of fees paid in advance
- the applicant's guarantee to complete training and/or assessment once the student has commenced study
- the fees and charges for any additional services, such as replacement qualification testamur and the options available to students who are deemed not yet competent on completion of training and assessment.

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

Provide evidence to demonstrate that clients will be provide with the following fee information which complies with this standard and includes:

- the total amount of all fees
- payment terms which align with the strategy for protection of fees in advance
- the applicant's guarantee to complete training and/or assessment once the student has commenced study
- the fees and charges for any additional services (if any).

Analysis of rectification evidence:

The applicant provided:

- a Course Fee Policy, which outlined the categories of fees and payment terms
- a course brochure for the proposed qualification, which included the total fee cost, and any potential additional costs
- Obligations to Students Policy and Student Acceptance Agreement, both of which included the applicant's guarantee to complete training and/or assessment once the student has commenced study

The evidence provided demonstrates that clients will be provided with fee information which complies with this standard and includes; the total amount of all fees, payment terms which align with the strategy for protection of fees in advance, the applicant's guarantee to complete training and/or assessment once the student has commenced study the fees and charges for any additional services.

- 11.3** Where the applicant intends collecting student fees in advance it must ensure it will comply with one of the following acceptable options for continuing registration:
- (a) (Option 1) the RTO is administered by a State, Territory or Commonwealth government agency;
- (b) ~~(Option 2) the RTO holds current membership of an approved Tuition Assurance Scheme; [option 2 not currently available]~~
- (c) (Option 3) the RTO may accept payment of no more than \$1000 from each individual student prior to the commencement of the course. Following course commencement, the RTO 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 RTO holds an unconditional financial guarantee from a bank operating in Australia for no less than the full amount of funds held by the RTO which are prepayments from students (or future students) for tuition to be provided by the RTO to those students; or
- (e) (Option 5) the RTO has alternative fee protection measures of equal rigour approved by the National VET Regulator.

Original finding: Compliant

Following rectification: n/a

SNR 12 Strategy for certification, issuing and recognition of qualifications & statements of attainment

- 12.1** The applicant must identify how it will 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 requirements;
- (b) identifies the RTO by its national provider number from the National Register; and
- (c) includes the Nationally Recognised Training (NRT) logo, in accordance with the current conditions of use.

Original finding: Compliant

Following rectification: n/a

12.2	The applicant must confirm that it will recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.		
Original finding:	Compliant	Following rectification:	n/a
12.3	The applicant must retain client records of attainment of units of competency and qualifications for a period of 30 years.		
Original finding:	Compliant	Following rectification:	n/a
12.4	The applicant must identify how it will provide returns of its client records of attainment of units of competence and 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.			
12.5	The applicant must meet the requirements for implementation of a national unique student identifier. [no requirements currently exist]		
This element was not audited.			

SNR 13 Strategy for accuracy and integrity of marketing

13.1	The applicant must demonstrate that its proposed marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.	
	Original finding: Compliant	Following rectification: n/a
13.2	The applicant demonstrates that it will use the NRT logo only in accordance with its conditions of use.	
	Original finding: Compliant	Following rectification: n/a

SNR 14 Strategy for transition to Training Packages/expiry of VET accredited courses

14.1	The applicant must identify how it will 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:	Not compliant	Following rectification:	Compliant

Reasons for finding of non-compliance:

- The applicant provided a policy for transition. The evidence provided does not support compliance with SNR 14.1 because the policy included only information from the ASQA General Direction and did not identify the processes that will implemented to ensure it will manage the transition from superseded training packages within 12 months of their publication.

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

- Provide evidence to demonstrate it has processes in place to manage the transition from superseded training packages.

Analysis of rectification evidence:

The applicant provided a Transition of Superseded Courses policy and procedure, which outlined how they would manage transition from superseded courses. The evidence provided supports compliance with the requirements of SNR 14.1.

14.2	The applicant must identify how it will manage the transition from superseded VET accredited courses so that it will deliver only currently endorsed Training Packages or current VET accredited courses.
Original finding: Not audited	Following rectification: n/a

