

## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	<b>NOMBAY PTY LTD</b>
Trading name/s	Advanced Industry Training
RTO number	5363
CRICOS number	N/A

#### AUDIT TEAM

Lead auditor	Wayne Stent
Auditor/s	N/A
Technical adviser/s	N/A

#### AUDIT DETAILS

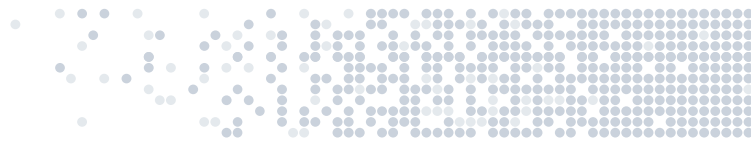
Application number/s	N/A	
Audit number/s	1005277	
Audit reason 1	Compliance - monitoring	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Other	
Address of site/s visited	n/a	
Date/s of audit	28 April 2014	
Organisation's contact for audit	Mr Geoffrey Stanford admin@aitraining.com.au	Managing Director (07) 4755 4222
NVR standards audited	Selected Standards for Continuing Registration: 15.2, 15.3, 15.4, 15.5, 18.1 and 24.1	

#### BACKGROUND

A review of the following units of competency for the removal of asbestos is being conducted by the Australian Skills Quality Authority (ASQA):

- *CPCCE3014A Remove non-friable asbestos*
- *CPCCE3015A Remove friable asbestos*

The purpose of the review is to focus on the delivery and assessment of these units to ensure they comply



with the training package requirements and the VET Quality Framework.

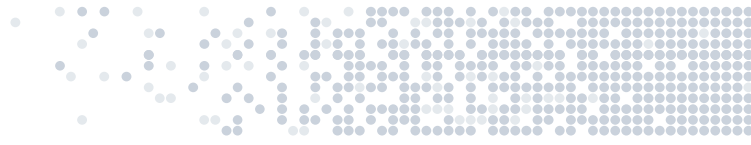
Advanced Industry Training has been identified as delivering *CPCCE3014A Remove non-friable asbestos* and *CPCCE3015A Remove friable asbestos* in NSW, QLD, WA and NT.

AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
CPCCE3014A	Remove non-friable asbestos	Class room/simulation	n/a
CPCCE3015A	Remove friable asbestos	Class room/simulation	n/a

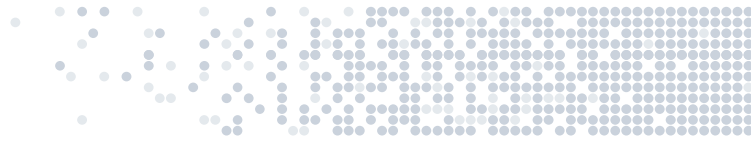
ORIGINAL AUDIT FINDING AT TIME OF AUDIT
<p><b>Audit finding as at 28/04/2014: Critical non-compliance</b></p> <ul style="list-style-type: none"> <li>The level of non-compliance considers the potential for an adverse impact on the quality of training and assessment outcomes for students.</li> <li>If non-compliance has been identified, this audit report describes evidence of the non-compliance.</li> <li>Refer to notification of non-compliance for information on providing further evidence of compliance.</li> </ul>

AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE
<p><b>Audit finding following analysis of additional evidence provided on 26/05/2014: Compliant</b></p>

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



SNR 25	Not audited	n/a
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**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:** Not audited

**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:*

The training and assessment strategies supplied for *CPCCCDE3014A Remove non-friable asbestos* and *CPCCCDE3015A Remove friable asbestos* do not comply with the *CPC08 Construction, Plumbing and Services Training Package* requirements.

The strategies state that assessment will be in accordance with the assessment instruments, Evidence Guide and the Assessment Guidelines of the Construction, Plumbing and Services Training Package. There is no information for trainers, assessors or employers detailing how the RTO actually deploys training and assessment in accordance with training package requirements.

As examples the evidence guide states:

- Where assessment is part of a structured learning experience the evidence collected must relate to a number of performances assessed at different points in time and separated by further learning, with a decision on competency only taken when the assessor has complete confidence in the person's demonstrated ability and applied knowledge.
- All assessment that is part of a structured learning experience must include a combination of direct, indirect and supplementary evidence.

The RTO's strategy refers only to delivery and assessment being conducted in a simulated work environment with a high degree of supervision and the evidence gathering techniques include only direct forms of evidence as mandatory ie scenario based assessment and written test of underpinning knowledge.

There is no requirement for the use of indirect and supplementary evidence and how this is to be gathered.

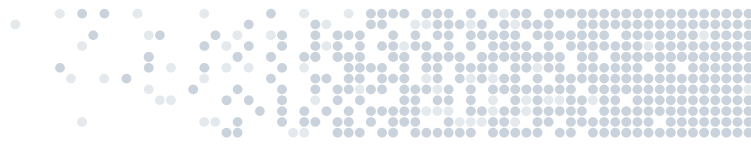
*In order to become compliant, the organisation is required to:*

- Provide revised training and assessment strategies for *CPCCCDE3014A Remove non-friable asbestos* and *CPCCCDE3015A Remove friable asbestos* that comply with all training package requirements including evidence guide requirements and provide information detailing how the RTO implements these requirements.

*Analysis of rectification evidence:*

The RTO provided training and assessment strategies for:

- *CPCCCDE3014A Remove non-friable asbestos*
- *CPCCCDE3015A Remove friable asbestos*



The revised strategies now comply with the requirements of the *CPC08 Construction, Plumbing and Services Training Package*.

The RTO is compliant.

**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:*

- Insufficient evidence was provided to demonstrate that trainers/assessors meet training package requirements. Refer to SNR15.4 for details of findings.
- Assessment resources examined under SNR15.5 do not comply with training package requirements. Refer to SNR15.5 for details of findings.

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

- Refer to SNR15.4 and SNR15.4 for rectification requirements.

*Analysis of rectification evidence:*

The RTO has provided sufficient evidence to demonstrate that non-compliances with SNR15.4 and SNR15.5 have been rectified. Refer to SNR15.4 and 15.5 for listing of evidence supplied and detail on findings.

**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:** Not compliant

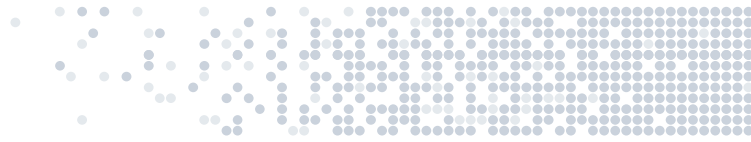
**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

**Geoffrey Stanford** - delivers *CPC08 Construction, Plumbing and Services Training Package* endorsed assessment guidelines: *CPC08 Construction, Plumbing and Services Training Package* endorsed assessment guidelines: *Remove non-friable asbestos* and *Remove friable asbestos*

The qualifications, statements of attainment and the Certificate to perform prescribed activity do not provide sufficient evidence to demonstrate that the trainer/assessor meets the following requirements of the *CPC08 Construction, Plumbing and Services Training Package* endorsed assessment guidelines:

- Relevant industry experience, that is, workplace experience within the last two years in the competency area being delivered
- Relevant occupational registration or licensing in areas where this is a regulatory



requirements to practice in the jurisdiction where the qualifications is being assessed.

There was no evidence to demonstrate that Geoffrey Stanford has conducted removal of non-friable and friable asbestos within the last two years and the Certificate to perform prescribed activity issued by Queensland Government Department of Industrial Relations shows that he is registered only as an asbestos removalist for bonded asbestos material >= 10 sq m.

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

- Provide evidence to demonstrate that Geoffrey Stanford meets all of the requirements for assessors specified by the *CPC08 Construction, Plumbing and Services* endorsed assessment guidelines.

*Analysis of rectification evidence:*

The RTO provided;

- A letter dated 26 May from Nigel Bull, Safe Systems Manager Watts Constructions attesting to asbestos removal work performed by Geoffrey Stanford within the last two years.

The RTO is compliant.

**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

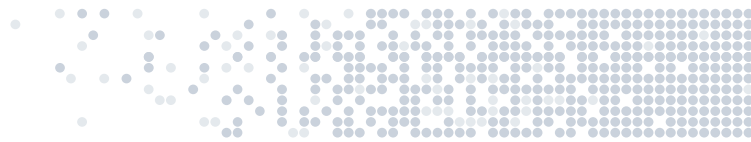
*Reasons for finding of non-compliance:*

Assessment instruments incorporating the marking guide, instructions for assessors, multiple choice, written answer questions and the practical demonstration checklist for *CPC083014A Remove non-friable asbestos* and *CPC083015A Remove friable asbestos* do not ensure that sufficient evidence is gathered and used by assessors to certify a person competent against training package requirements.

There are no instructions for assessors and employers about requirements for the use of indirect and supplementary evidence, how the evidence is to be collected and the assessment records to be used.

There are no instructions about the context of the assessment such as range of asbestos containing materials to be removed, the removal method to be used ie. wet and dry methods, the number of assessments to be performed and how the assessments are to be separated by further learning and practice. The practical demonstration checklist task includes the removal of asbestos containing wall sheeting and provides for only one assessment event to be recorded. As a result the assessment does not ensure the following evidence guide requirements are complied with:

- Use of a combination of direct, indirect and supplementary evidence
- That competency is demonstrated over a period of time reflecting the scope of the role and the practical requirements of the workplace
- Where the assessment is part of a structured learning experience the evidence collected must relate to a number of performances assessed at different points in time and separated by further learning and practice, with a decision on competence only taken when the assessor



- has complete confidence in the person's demonstrated ability and applied knowledge
- Confirm that competency is verified and able to be transferred to other circumstances and environments

The written assessment contains significant errors with regard to the model answers given.

For example multiple choice question 3 asks the student:

Asbestos fibres:

- A. Can always be seen when airborne
- B. Resist becoming airborne because of their negative electrical charge
- C. Cannot be generated by the mechanical disintegration of ACM
- D. None of the above

The model answer given for this question is C (ie Cannot be generated by the mechanical disintegration of ACM)

Given that friable asbestos can be made friable through accidental damage, wear and tear, weathering and the application of tools and equipment the model answer is incorrect.

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

- Provide revised assessment resources for *CPCCE3014A Remove non-friable asbestos* and *CPCCE3015A Remove friable asbestos* which include instructions and recording instruments that ensure that assessments comply with of the evidence guide requirements specified by the *CPC08 Construction, Plumbing and Services Training Package*.

*Analysis of rectification evidence:*

The RTO provided the following evidence for CPCCE3014A and CPCCE3015A

- Revised training and assessment strategies
- Revised lesson plans
- Revised assessment guides and checklists
- Email dated 19 May 2014 giving advice on assessment requirements

The revised materials now comply with training package requirements and the advice given to the RTO by the Construction and Property Services Industry Skills Council.

**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.**

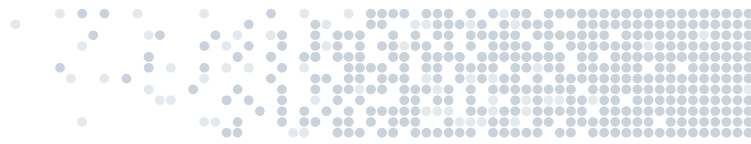
**Original finding:** Not audited

**Following rectification:** n/a

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

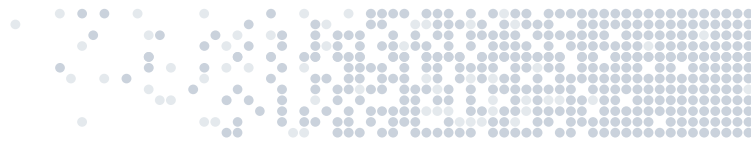
**Original finding:** Not audited

**Following rectification:** n/a



<b>16.3</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>16.4</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>16.5</b>	<b>Learners receive training, assessment and support services that meet their individual needs.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>16.6</b>	<b>Learners have timely access to current and accurate records of their participation and progress.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>16.7</b>	<b>The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>SNR 17</b>	<b>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:</b>		
<b>17.1</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>17.2</b>	<b>The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>17.3</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a





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

**Original finding:** Not audited

**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:*

- The CEO has not ensured compliance with the VET Quality Framework as non-compliances have been identified against SNR 15.2, 15.3, 15.4, 15.5 and 24.1.

*Analysis of rectification evidence:*

The RTO has provided sufficient evidence to demonstrate compliance with requirements. Refer to SNR's 15.2, 15.3, 15.4, 15.5 and 24.1 for listing of the evidence provided and detail on findings.

**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:** Not audited

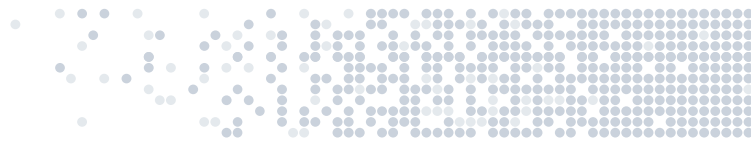
**Following rectification:** n/a

**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:** Not audited **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:** Not audited **Following rectification:** n/a

**SNR 22 Financial management**

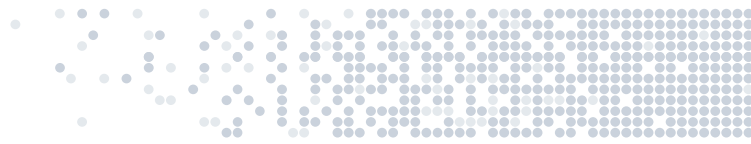
**22.1 The NVR registered training organisation must be able to demonstrate to the National VET Regulator, on request, that it is financially viable at all times during the period of its registration.**

**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 audited **Following rectification:** n/a



**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:** Not audited

**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 audited

**Following rectification:** n/a

**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

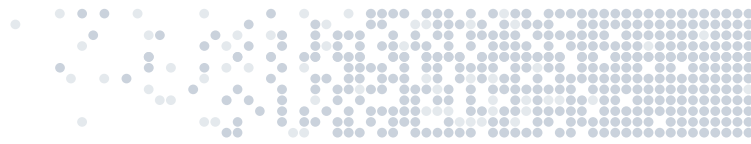
**23.3** The NVR registered training organisation must retain client records of attainment of units of competency and qualifications for a period of 30 years.

**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:*

- The Advanced Industry Training Code of Practice refers to the recognition of AQTF qualifications and Statements of Attainment. The reference to AQTF qualifications is incorrect as it is the *Australian Qualifications Framework* that sets out the national system of qualifications in Australia for vocational education and training.

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

- Provide revised marketing materials that provide accurate information for clients.

The RTO provided the following evidence:

- Revised RTO Code of Practice.

*The revised Code of Practice now includes accurate information with respect to the AQF qualifications offered.*

The RTO is compliant.

**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

**SNR 25 Transition to Training Packages/expiry of VET accredited courses**

**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:** Not audited

**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:** Not audited

**Following rectification:** n/a