



## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	Sapere Pty Ltd
Trading name/s	Not Specified

#### AUDIT TEAM

Lead auditor	Tracey Hancock
Auditor/s	N/A
Technical adviser/s	N/A

#### AUDIT DETAILS

Application number/s	1047654	
Audit number/s	1004760	
Address of site/s visited	1B Marion Road Mount Morrow	
Date/s of audit	29 and 30 January 2014	
Organisation's contact for audit	Mrs Patricia Barrie sapere2013@gmail.com	Director/CEO 0481 273 066
NVR standards audited	All Standards for Initial Registration	

#### BACKGROUND

The organisation identified a training need to up skill existing and new workers in the business and community services industry areas with a focus on delivering training in regional areas of Queensland.

The organisations intentions are that it **does** expect to:

- accept fees in advance from students
- deliver training from multiple sites/ workplaces

The organisations intentions are that it **does not** expect to:

- deliver training off shore/ outside Australia
- enter into a partnering arrangement
- be a recipient of government training contracts
- deliver training and/or assessment services to overseas students studying in Australia
- deliver training and/or assessment services to school students
- deliver training and/or assessment services students under the age of 18
- deliver training and/or assessment services to apprentices or trainees





## AUDIT SAMPLE

Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*
BSB30112	Certificate III in Business	Face to Face, Workplace
CHC30212	Certificate III in Aged Care	Face to Face, Workplace
CHC30312	Certificate III in Home and Community Care	Face to Face, Workplace
CHC30408	Certificate III in Disability	Face to Face, Workplace

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

## INTERVIEWEES

Name	Position	Qualification/Course/Unit code/s
Mrs Patricia Barrie	Director/CEO	N/A
Praneel Balgovind	Trainer and Assessor	N/A
Nileshni Balgovind	Trainer and Assessor	BSB30112 Certificate III in Business

## ORIGINAL AUDIT FINDING AT TIME OF AUDIT

### Audit finding as at 30/01/2014: Minor 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 30/01/2014: Compliant

## AUDIT FINDING BY STANDARD

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



SNR 14

Compliant

n/a

Original finding - Not compliant

Original finding - Not compliant

Original finding - Not compliant

Original finding - Not compliant

Original finding - Not compliant

Original finding - Not compliant

Original finding - Not compliant





**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:** Compliant

**Following rectification:** n/a

**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:*

- as non-compliances were identified in SNR 4.5, the organisation did not demonstrate it had assessment materials which met the requirements of the relevant training packages.

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

- provide evidence to satisfactorily address the non-compliances identified in SNR 4.5.

*Analysis of rectification evidence:*

- at the time of the audit, the organisation provided the evidence which satisfactorily addressed the non-compliances identified in SNR 4.5.

**4.4** The applicant has a defined strategy, procedures and measures to ensure training and assessment services are conducted by trainers and assessors who:

(a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors;

(b) have the relevant vocational competencies at least to the level being delivered or assessed;

(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

**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:*

**CHC30312 Certificate III in Home and Community Care**

CHCHC311C Work effectively in home and community care

**CHC30408 Certificate III in Disability**

CHCDIS302A Maintain an environment to empower people with disabilities

The assessment evidence provided:

- did not support that assessment meets the requirements of the relevant training packages.
- did not ensure that the evidence collected meets the rules of evidence, specifically that it is sufficient evidence.

The following specific issues were identified:

The workplace third party evidence report provided did not:

- address all the skill components as defined in the unit of competency.
- did not interpret the skills for assessment into observable tasks for the student and the assessor.
- did not provide clear assessment instructions for the student and the third party person.

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

- provide a workplace third party evidence report which address all the skill components as defined in the unit of competency, interprets the skills for assessment into observable tasks and provides clear instructions for the student and third party person.

*Analysis of rectification evidence:*

- at the time of the audit, the organisation provided a third party evidence report which address all the skill components as defined in the unit of competency, interprets the skills for assessment into observable tasks and provides clear instructions for the student and third party person.

**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.**





	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>5.4</b>	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.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>5.5</b>	The applicant has a defined process and mechanism in place to ensure learners receive training, assessment and support services that meet their individual needs.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>5.6</b>	The applicant has a defined process and mechanism in place to ensure learners have timely access to current and accurate records of their participation.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>5.7</b>	The applicant has a defined complaints and appeals process that will ensure learners' complaints and appeals are addressed effectively and efficiently.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>SNR 6</b>	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:	
<b>6.1</b>	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.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>6.2</b>	The applicant has a defined strategy for the implementation of a systematic continuous improvement approach to the management of operations.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>6.3</b>	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.	
	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
	<ul style="list-style-type: none"><li>• Not applicable at this time</li></ul>	
<b>6.4</b>	The applicant has a defined strategy and process to manage records to ensure their accuracy and integrity.	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>SNR 7</b>	The applicant has adequate governance arrangements, as follows:	





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

<b>7.2</b>	<b>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.</b>
<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a

<b>7.3</b>	<b>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.</b>
<b>Original finding:</b> Not compliant	<b>Following rectification:</b> Compliant

*Reasons for finding of non-compliance:*

- due to non-compliances identified across other standards the NVR registered training organisation's chief executive has not ensured the NVR registered training organisation complies with all requirements of the VET Quality Framework.

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

- the rectification evidence provided to address the non-compliances identified in the other SNR standards will suffice to cover this requirement, so long as the rectification evidence is compliant.

*Analysis of rectification evidence:*

- the rectification evidence provided at the time of the audit addressed the non-compliances identified in the other SNR standards.

<b>SNR 8</b>	<b>Interactions with the National VET Regulator</b>
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<b>8.1</b>	<b>The application for initial registration must be accompanied by a self-assessment report of the applicant's compliance with the VET Quality Framework.</b>
<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a

<b>8.2</b>	<b>The applicant's chief executive must identify how it will ensure that the applicant will co-operate with the National VET Regulator:</b> <b>(a) in the conduct of audits and the monitoring of its operations;</b> <b>(b) by providing accurate and timely data relevant to measures of its performance;</b> <b>(c) by providing information about significant changes to its operations;</b> <b>(d) by providing information about significant changes to its ownership; and</b>
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(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: Compliant

Following rectification: n/a

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: Compliant

Following rectification: n/a

#### 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: Compliant

Following rectification: n/a





- 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:** Compliant

**Following rectification:** n/a

**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

- Not applicable at this time