



## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	<b>Dynamic Learning Services Pty Ltd</b>
Trading name/s	Dynamic Learning Services Pty Ltd
RTO number	40467
CRICOS number	n/a

#### AUDIT TEAM

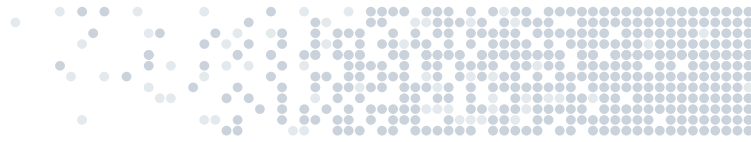
Lead auditor	Robyn Trigg
Auditor/s	Gayatri Mahesh
Technical adviser/s	n/a

#### AUDIT DETAILS

Application number/s	n/a
Audit number/s	1002305
Audit reason 1	Post initial
Audit reason 2	n/a
Audit reason 3	n/a
Activity type	Site visit
Address of site/s visited	2/176 The Entrance Road, ERINA NSW 2250
Date/s of audit	12 and 13 June 2014
Organisation's contact for audit	Mr Andrew Brownhill                      CEO andrew@dynamiclearningservi      02 4365 0040 ces.com.au
NVR standards audited	Selected Standards for Continuing Registration: 15, 16, 17, 18, 20.2, 20.2, 21.1, 22.2, 22.3, 23.1, 24.1 & 25

#### BACKGROUND

Dynamic Learning Services Pty Ltd (DLS) was first registered as an RTO on 28 June 2012 following an initial audit conducted by the Queensland Department of Education and Training. Prior to its registration, the applicant's CEO, Mr Greg McCullough, had over 20 years of experience in the VET industry including managing RTOs. A number of people were involved in positions of ownership, management and control of the organisation at that time; Mr Stephen Borg of Surry Hills was a Director, Mr Greg McCullough of North Avoca was a Senior Officer, Ms Nichole Clifford of The Entrance was a Senior Officer and Weiye Human Resources Group PL of Kingsford - (Jacob McCullough was a Principal of this Group) was a substantial shareholder.



Mr Greg McCullough, the Director was also the CEO of another RTO at that time, Australasian Education and Training Services - AETS (RTO 7064) which was established in 1996. The proposed permanent delivery site for DLS at the time of its registration was 32 Crockford Street, Banyo Queensland with a total scope of six items from the Business (BSB), Aged Care (CHC), Property Services (CPP) and Training and Assessment (TAE) industry areas.

DLS was registered as an Australian Company on 26 October 2010 and as a NSW business on 5 March 2012. The premises it operated from in Banyo Queensland were leased from C8 Group/C8 Freightworks on 11 January 2012. At the time of application for registration most applicant declarations were witnessed by Cathy Bade, an Administration Officer for AETS.

At this post-initial site audit there was evidence of significant changes in the RTO's operations. The current CEO, Mr Andrew Brownhill and the RTO Manager, Ms Glenys Stabback have been employed in their current capacity for a relatively short time. Mr Brownhill had worked at the Queensland site as a Training Manager since 10 December 2013 having replaced Mr Cameron Shepherd (Mr Cameron Shepherd had replaced Mr Greg McCullough on 21 March 2013.) Ms Glenys Stabback is yet to be registered as the RTO Manager. The RTO has relocated to its current NSW address of Suite 2 176 The Entrance Road, Erina and staff numbers have grown in response to business growth. The organisation chart now shows a staff of eight, including five Project Managers and a changing cohort of contract trainer/assessors who are contracted for the delivery duration of specific training programs. Gail Penman has been a long-term employee as Accounts Manager, on an as needs basis. It is of note that Australasian Education & Training Services is registered in the same office area at Suite 4, 176 The Entrance Road, Erina.

DLS now has a scope of 27 qualifications from seven Training Packages: AHC – Agriculture, Horticulture and Conservation and Land Management, BSB – Business Services, FDF – Food Processing, MSA – Manufacturing, MSS – Sustainability, SIR – Retail Services, SIT Tourism, Travel & Hospitality and TLI – Transport and Logistics. The RTO scope extension is being driven by a perceived demand for DLS services across Australia. The RTO has trained more than 1,500 people over the last two years (including non-accredited programs). It is planning to extend its scope again in coming months due to the needs of several clients and upcoming funding availability that it will tender for in Western Australia, South Australia and Victoria. The CEO noted that the latest cessation of existing worker traineeships and the changing availability of Commonwealth funding sources have forced DLS to look at other ways of doing business.

DLS's main client stakeholders are United Energy and Resources (WH&S programs) Home Care/Living Care (management programs), various Baiada Poultry plants (business programs), Queensland Cowboys RFL and other RFL clubs (warehousing and management programs), AP Eagers (warehousing, frontline and other management programs), Villawood Detention Centre (hospitality programs) and C8 Group (management programs). Other clients include Spotpress (business programs), Media View P/L (business programs), Galvin Engineering, Aalborg Industries, Brisbane Water Bitumen and Wattletree Group.

DLS's delivery range is national, but mainly Australian eastern seaboard with a reasonable balance of numbers across the eastern states of Queensland, NSW and Victoria. Delivery is also predominantly at client/employer worksites, usually delivering to a cohort of client employees. In unusual cases of individual (either fee for service or traineeship transfer cases) delivery, a distance learning model is used.

Resources are usually couriered to either the contracted trainer/assessor or the client or sent by Dropbox, depending upon the amount of training resources required.

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

- 1,256
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AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
BSB40812	Certificate IV in Frontline Management	Face to Face/T'ships	83
BSB51107	Diploma of Management	Face to Face/T'ships	783
SIT40313	Certificate IV in Hospitality	Face to Face/T'ships	1
TAE40110	Certificate IV in Training and Assessment	Face to Face/Online	7
BSB41412	Certificate IV in Work Health and Safety	Face to Face/T'ships	1
CHC30212	Certificate III in Aged Care	Face to Face/T'ships	371
CHC40108	Certificate IV in Aged Care	Face to Face/T'ships	10

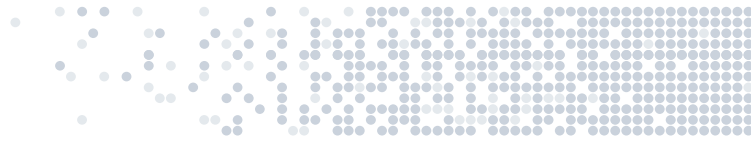
\*Apprenticeship, Traineeship, Face to face, Distance, Online, Workplace, Mixed, Other (specify)

INTERVIEWEES		
Name	Position	Qualification/Course/Unit code/s
Andrew Brownhill	CEO	N/A
Glenys Stabback	RTO Manager	N/A

ORIGINAL AUDIT FINDING AT TIME OF AUDIT
<b>Audit finding as at 10/07/2014: Significant non-compliance</b>
<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
<b>Audit finding following analysis of additional evidence provided on 15/09/2014: Compliant</b>

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



SNR 21	Compliant	n/a
SNR 22	Compliant	n/a
SNR 23/AQF	Compliant	n/a
SNR 24	Compliant	n/a
SNR 25	Compliant	n/a



<b>SNR 15</b>	<b>The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:</b>
<b>15.1</b>	<b>The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.</b>
<b>Original finding:</b>	Compliant
<b>Following rectification:</b>	n/a
<b>15.2</b>	<b>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.</b>
<b>Original finding:</b>	Compliant
<b>Following rectification:</b>	n/a
<b>15.3</b>	<b>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.</b>
<b>Original finding:</b>	Not compliant
<b>Following rectification:</b>	Compliant
<i>Reasons for finding of non-compliance:</i>	
<ul style="list-style-type: none"><li>The RTO did not provide evidence of training materials used in the delivery of the SIT40313 Certificate IV Hospitality.</li></ul>	
<i>In order to become compliant, the organisation is required to:</i>	
<ul style="list-style-type: none"><li>Provide evidence of training materials used in the delivery of the SIT40313 Certificate IV Hospitality.</li></ul>	
<i>Analysis of rectification evidence:</i>	
<ul style="list-style-type: none"><li>The RTO has provided evidence of Learner Guides for the following two units of competency sampled for audit:<ul style="list-style-type: none"><li><u>SIT40313 Certificate IV Hospitality</u><ul style="list-style-type: none"><li>SITXFIN402 Manage finances within a budget</li><li>SITXHRM402 Lead and manage people</li></ul></li></ul></li><li>The RTO has demonstrated compliance with Standard 15.3.</li></ul>	
<b>15.4</b>	<b>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.</b>
<b>Original finding:</b>	Compliant
<b>Following rectification:</b>	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:*

SIT40313 Certificate IV Hospitality:

The assessment tools sampled for this qualification:

- SITXFIN402 Manage finances within a budget
- SITXHRM402 Lead and manage people

The RTO was unable to provide any assessment tools for the two units of competency sampled for the SIT40313 Certificate IV Hospitality. The RTO advised at audit that they did not have materials for the two units sampled at the time of audit and would provide this evidence as part of rectification evidence.

BSB40812 Certificate IV Frontline Management:

For the unit, BSBMGT403A Implement continuous improvement, assessment tools:

- do not meet the required skills and knowledge as outlined in the unit of competency, including, but not limited to, communication skills to: coach and mentor team members and gain the commitment of individual and teams to continuously improve.
- do not address all aspects of the unit of competency. For example, Performance Criteria 1.2: Communicate the organisation's continuous improvement process to individuals and teams, and obtain feedback.

For the unit, BSBMGT402A Implement operational plan, assessment tools:

- do not meet the required skills and knowledge as outlined in the unit of competency, including, but not limited to, coaching and mentoring skills to provide support to colleagues and tactical risk analysis including identification and reporting requirements.
- do not address all aspects of the unit of competency. For example, Performance Criteria 1.5: Provide assistance in the development and presentation of proposals for resource requirements in line with operational planning processes.

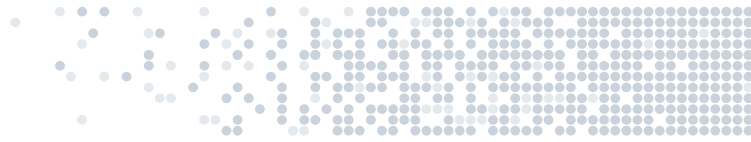
BSB51107 Diploma of Management:

For the unit, BSBRSK501B Manage Risk, assessment tools

- do not meet the required skills and knowledge as outlined in the unit of competency, including, but not limited to, Legislation, code of practise and national standard, for example: environmental law, freedom of information, industrial relations law etc.
- do not address all aspects of the unit of competency. For example, Performance Criteria 1.8 Communicate with relevant parties about the risk management process and invite participation.

For the unit, BSBWOR502B Ensure Team Effectiveness

- The Assessment guide, specifically the assessment matrix in the guide, lists there is an



assessment task 2 for this unit. However, there was no evidence of a task provided for assessment task 2 in the assessment guide. It is unclear what assessment task 2 is for this unit.

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

- Provide assessment tools for the below units of competency that address all aspects of the unit of competency, including elements, performance criteria, required skills, required knowledge, and critical aspects of assessment:

SIT40313 Certificate IV Hospitality:

- SITXFIN402 Manage finances within a budget
- SITXHRM402 Lead and manage people

BSB40812 Certificate IV Frontline Management

- BSBMGT403A Implement continuous improvement
- BSBMGT402A Implement operational plan

BSB51107 Diploma of Management:

- BSBRSK501B Manage Risk
- BSBWOR502B Ensure Team Effectiveness

*Analysis of rectification evidence:*

- The RTO has provided revised assessment tools, marking guides, and a mapping document for the below units of competency:

SIT40313 Certificate IV Hospitality:

- SITXFIN402 Manage finances within a budget
- SITXHRM402 Lead and manage people

BSB40812 Certificate IV Frontline Management

- BSBMGT403A Implement continuous improvement
- BSBMGT402A Implement operational plan

BSB51107 Diploma of Management:

- BSBRSK501B Manage Risk
- BSBWOR502B Ensure Team Effectiveness

- The assessment tools address all aspects of the unit of competency, including elements, performance criteria, required skills, required knowledge, and critical aspects of assessment.

- The RTO has demonstrated compliance with Standard 15.5.

**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



<b>16.2</b>	<b>The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.</b>
<b>Original finding:</b> Compliant	<b>Following rectification:</b> 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> Compliant	<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> Compliant	<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> Compliant	<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> Compliant	<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> Compliant	<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> Compliant	<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> Compliant	<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 compliant	<b>Following rectification:</b> Compliant
<i>Reasons for finding of non-compliance:</i>	





- Trainer Memorandum of Understanding (15/12/2013 V1) between Dynamic Learning Services (the RTO) and Care Education & Training Services Pty Ltd - CARE (the non-RTO), signed 17/12/2013, for Care Director Jai Kiran Seelam to provide training in CHC30212 Certificate III in Aged Care and CHC40108 Certificate IV in Aged Care is due to expire on 31 December 2014.

The Memorandum has an Appendix A – Responsibility Matrix which details requirements regarding staff competency, staff induction, student information and induction, student and staff records management, assessment strategies and communication. Each requirement is designated with responsibilities for CARE and responsibilities for DLS. This agreement documents arrangements for training and assessment materials, attendance records, enrolment forms, monitoring of the program via collection of feedback, duty of care for participants, training facilities, course materials including lesson plans, learner guides, marking guides, validation documents, resources and workplace documentation, marketing materials, nominated trainer and assessors, financial arrangements, insurance, quality assurance, communication and exchange of information, intellectual property and settlement of disputes.

There are, however, inconsistencies in many aspects of the memorandum and the appendix. For example, in one section it is stated that all learning and assessment material, course participant notes and manuals and training facilities are to be provided by DLS, while in another it refers to manuals or materials to be used if provided by CARE. In the Quality Assurance section it is stated that DLS has obligations in relation to assuring the quality of all aspects of assessment, while in another it states that CARE should give consideration to graded assessment requirements and that DLS may visit for purpose of review and audit of the training.

Information in regard to quality control such as complaint and appeal handling arrangements, analysis of client feedback, record keeping arrangements, mechanisms for reviewing and evaluating the effectiveness of the Memorandum and the quality assurance arrangements are not captured in the MOU.

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

- Provide evidence to demonstrate that the RTO monitors training and assessment services provided on its behalf to ensure it complies with all aspects of the VET Quality Framework. Evidence is to include copies of all memorandums of understanding that the RTO has with third parties that contain accurate, consistent and current information, and clearly describe the monitoring arrangements and responsibilities of all parties involved.

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*Analysis of rectification evidence:*

The RTO provided the following evidence:

- Opportunity for Improvement record (CR0034 – 21/7/2014)
- Updated Policy and Procedure (V5.1)
- Partnership Agreement (24/7/2014)

The Opportunity for Improvement record demonstrates that the RTO took action to rectify the inconsistencies in the agreement between DLS and CARE, that a site audit checklist was created for use at quarterly site visits and that a relevant RTO policies and procedures were amended.

The Quality Compliance PP (V5.1) demonstrates that the RTO has developed a policy and procedures regarding partnership arrangement specifications, contents, maintenance and monitoring. This includes marketing, subcontracting arrangements and traineeship supervision arrangements.

The Partnership Agreement (V2 – co-signed 24/7/2014) contains information in regard to quality



control such as complaint and appeal handling arrangements, analysis of client feedback, record keeping arrangements, mechanisms for reviewing and evaluating the effectiveness of the agreement and the quality assurance arrangements.

The RTO has demonstrated compliance with SNR 17.3.

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

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The RTO currently collects records of student assessments following the completion of the entire delivery program. Accuracy and integrity of such records is not monitored by the RTO until program completion.

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

- Provide evidence to demonstrate that it manages records to ensure their accuracy and integrity throughout the duration of a training program.

*Analysis of rectification evidence:*

The RTO provided the following evidence:

- Opportunity for Improvement form (CR0033 - 21/7/2014)
- Updated Policy and Procedure (V2)
- Partnership Agreement (24/7/2014)
- Site Audit Checklist (10/8/2014)

The Opportunity for Improvement record demonstrates that the RTO took action to rectify the records collection operations by including the requirement for a monthly report from CARE on student progression and new student's details being provided to DLS prior to commencement of training.

The Records Management PP (V2) demonstrates that the RTO has developed a policy and procedures regarding Third Party Delivery which includes the requirement for a monthly report from CARE on student progression and new student's details being provided to DLS prior to commencement of training.

The Site Audit Checklist demonstrates that the RTO will perform a quarterly site audit of CARE's training and office facilities to review trainer/assessors, facilities, training and assessment, WHS, Continuous Improvement, Student Feedback, Student Fees and any other areas that indicate they require action.

The RTO has demonstrated compliance with SNR 17.4.

**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.**



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**Original finding:** Not compliant

**Following rectification:** Compliant

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*Reasons for finding of non-compliance:*

- The RTO's CEO has not ensured that the registered organisation complies with the VET Quality Framework as outlined by the non-compliances identified in this audit report.

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

- Provide evidence to demonstrate the RTO's CEO has ensured that all non-compliances identified in this audit report are rectified.
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*Analysis of rectification evidence:*

- The RTO provided the following evidence:
  - Opportunity for Improvement form (CR0034 - 21/7/2014)
  - Audit Report Rectification Advice and Evidence for all outstanding non-compliances.

The RTO has demonstrated compliance with SNR 18.1.

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**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.**

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**Original finding:** Not compliant

**Following rectification:** Compliant

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*Reasons for finding of non-compliance:*

- The RTO did not provide evidence of how it ensures the decision making of senior management is informed by the experiences of its trainers and assessors.

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

- Provide evidence to demonstrate how it ensures the decision making of senior management is informed by the experiences of its trainers and assessors.
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*Analysis of rectification evidence:*

- The RTO provided the following evidence:
  - Opportunity for Improvement form (CR0035 - 21/7/2014)
  - Updated Policy and Procedure (V2)
  - Monthly Trainers Report
  - Immediate Action Required form
  - Outlook Calendar Meeting schedule
  - Email to RTO staff regarding Quality and Compliance Meeting Agenda and attendance request including skype/conference call attendance if necessary

The Opportunity for Improvement form demonstrates that the RTO has developed a policy and procedures requiring action to create "Monthly Trainer Report" template and Immediate Action Report template.

The SNR 18.2 PP demonstrates that the RTO has developed a policy and procedures regarding Monthly Trainers Reports and Consultation with Trainers and Assessors.

The RTO has demonstrated compliance with SNR 18.2.



## 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:** Compliant

**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:** 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:** Compliant

**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:** Compliant

**Following rectification:** n/a

**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:** 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:** Not audited

**Following rectification:** n/a