



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

ORGANISATION DETAILS	
Organisation's legal name	Strategic Health Services Pty Ltd
Trading name/s	Strategic Deployment Services
RTO number	32505
CRICOS number	n/a

AUDIT TEAM	
Lead auditor	Mrs Karen Noble
Auditor/s	n/a
Technical adviser/s	n/a

AUDIT DETAILS		
Application number/s	n/a	
Audit number/s	1002819	
Audit reason 1	Post initial	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	185 Nerada Road, Maryborough QLD 4650	
Date/s of audit	24-25 July 2013	
Organisation's contact for audit	Ms Sharon Gough	Chief Executive Officer
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NVR standards audited	All Standards for Continuing Reg	istration

#### BACKGROUND

- The organisation provides training and assessment services to skill unemployed workers in Maryborough through Job Seeker Agencies. The organisation also provides its *RII20109 Certificate II in Resources and Infrastructure Work Preparation* qualification to high school cohorts at its premises.
- Funding occurs through Energy Skills Qld and User Choice.
- The organisation partners with other RTOs in Maryborough to provide services on its behalf.
- On 21 August 2013 the RTO's Chief Executive advised the Lead Compliance Auditor of errors in the report surrounding SNR 15.4. It was also noted that the qualification *RII30809 Certificate III in Civil Construction Plant Operations* had been incorrectly recorded in the report as *RII30809 Certificate III in Civil Construction Plant*. Consequently, amendments were made to the report to ensure accuracy, and the report re-issued to the RTO on 21 August 2013.

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

• 98

AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
RII20709/RII20712	Certificate II in Civil Construction	Face to face	0
RII30809	Certificate III in Civil Construction Plant Operations	Face to face	15
RII40909	Certificate IV in Drilling Operations	Face to face	0
TLIF31210	Certificate III in Driving Operations	Face to face	18
CPCCOHS1001A	Work safely in the construction industry	Face to face	12
CPPCMN3001B	Participate in environmentally sustainable work practices	Face to face	0
TLILIC2001A	Licence to operate a forklift truck	Face to face	22
TLILIC3003A	Licence to operate a bridge and gantry crane	Face to face	0

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

INTERVIEWEES		
Name	Position	Qualification/Course/Unit code/s
Ms Sharon Gough	CEO	n/a
Mr Dan Gough	Director	n/a
Mr John Porter	Trainer/assessor	RII20712, RII30809, RII40909

#### ORIGINAL AUDIT FINDING AT TIME OF AUDIT

#### Audit finding as at 25/07/2013: 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 12/09/2013: Compliant

AUDIT FINDING BY STANDARD		
Standard Original finding Finding following rectifica		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	Compliant	n/a
SNR 20	Compliant	n/a
SNR 21	Compliant	n/a
SNR 22	Compliant	n/a
SNR 23/AQF	Not compliant	Compliant
SNR 24	Compliant	n/a
SNR 25	Compliant	n/a

### SNR 15 The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:

15.1 The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.

Original finding: Compliant

Following rectification: n/a

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

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

RII20709/RII20712 Certificate II in Civil Construction RII30809 Certificate III in Civil Construction Plant Operations RII40909 Certificate IV in Drilling Operations TLIF31210 Certificate III in Driving Operations

- For each qualification listed, the strategy for training and assessment did not describe a delivery program the organisation would deliver in order to meet the requirements of the relevant Training Package. Instead, the strategy listed all units of competency able to be offered as part of packaging requirements; consequently the strategy did not describe a framework to guide the training and assessment arrangements of each qualification. The organisation confirmed it did not intend to offer all units in its delivery program and further confirmed it was not fully resourced to deliver all units of competency.
- Additionally, the strategy for training and assessment for *RII40909 Certificate IV in Drilling Operations* identified a trainer/assessor who did not meet the requirements of SNR15.4, and the organisation did not intend to utilise to deliver or assess the qualification.
- It was noted the organisation provided amended strategies for training and assessment which clearly identify the units of competency it intends to offer and is resourced to deliver, and refers to a trainer matrix for the identification of the trainer/assessor intended to deliver the qualification at the time of audit. No further rectification is required.

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:

- The staff and training and assessment materials used by the organisation are not consistent with the requirements of the training package due to non-compliance identified at SNR 15.4 and 15.5 with regard to the below qualifications and units of competency:
  - o RII20712 Certificate II in Civil Construction
  - o RII30809 Certificate III in Civil Construction Plant Operations
  - o TLI31210 Certificate III in Driving Operations
  - TLILIC3003A Licence to operate a bridge and gantry crane

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

 Successfully addressing non-compliance identified at SNR 15.4 and 15.5 will meet compliance with this element. Analysis of rectification evidence:

• The organisation provided evidence to address non-compliance identified at SNR 15.4 and 15.5, demonstrating compliance with this element.

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

Reasons for finding of non-compliance:

- The organisation was unable to provide evidence to demonstrate the below trainer/assessors have continued to develop their VET knowledge and skills as well as their industry currency and trainer/assessor competence:
  - o Mr Stan Wilkinson (RII30809 Certificate III in Civil Construction Plant Operations)
  - Mr Paul Camilleri (TLILIC2001A Licence to operate a forklift truck)
  - Mr Paul Johnson (*RII20712 Certificate II in Civil Construction, TLILIC2001A Licence to operate a forklift truck, TLILIC3003A Licence to operate a bridge and gantry crane*)
- Additionally, the organisation did not provide evidence that Mr Paul Camilleri has industry experience relevant to the unit of competency he is nominated to train and assess, *TLILIC2001A Licence to operate a forklift truck*

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

- Provide evidence that the following trainer/assessors have continued to develop their VET knowledge and skills as well as their industry currency and trainer/assessor competence:
  - Mr Stan Wilkinson (*RII30809 Certificate III in Civil Construction Plant Operations*)
  - Mr Paul Camilleri (*TLILIC2001A Licence to operate a forklift truck*)
  - Mr Paul Johnson (*RII20712 Certificate II in Civil Construction, TLILIC2001A Licence to operate a forklift truck, TLILIC3003A Licence to operate a bridge and gantry crane*)
- Provide evidence that Mr Paul Camilleri has industry experience relevant to the unit of competency he is nominated to train and assess, *TLILIC2001A Licence to operate a forklift truck*

Analysis of rectification evidence:

- The organisation provided its completed 'Professional Development Journal' for the following trainer/assessors:
  - Mr Stan Wilkinson (RII30809 Certificate III in Civil Construction Plant Operations)
  - Mr Paul Camilleri (*TLILIC2001A Licence to operate a forklift truck*)
  - Mr Paul Johnson (*RII20712 Certificate II in Civil Construction, TLILIC2001A Licence to operate a forklift truck, TLILIC3003A Licence to operate a bridge and gantry crane*)
- The completed 'Professional Development Journal' for Mr Paul Camilleri demonstrates his industry experience relevant to *TLILIC2001A Licence to operate a forklift truck*

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:

#### TLILIC3003A Licence to operate a bridge and gantry crane

• The organisation did not provide assessment tools for the above unit of competency. Therefore the organisation did not demonstrate it has access to assessment tools that meets regulatory requirements, meets the requirements of the Training Package and ensures assessment is conducted in accordance with the principles of assessment and the rules of evidence.

#### **RII20712 Certificate II in Civil Construction**

CPCCLRG3001A Licence to perform rigging basic level

• The organisation did not provide assessment tools for the above unit of competency. Therefore the organisation did not demonstrate it has access to assessment tools that meets regulatory requirements, meets the requirements of the Training Package and ensures assessment is conducted in accordance with the principles of assessment and the rules of evidence.

#### RIIOHS202A Enter and work in confined spaces

• Assessment tools were not accompanied by sufficient instructions to students or assessors to ensure consistency would be achieved between assessors.

#### TLI31210 Certificate III in Driving Operations

TLIF2010A Apply fatigue management strategies

- Assessment tools were not accompanied by sufficient instructions to students or assessors to
  ensure consistency would be achieved between assessors, or that the requirements of the unit
  of competency would be addressed in the assessment.
- Criteria defining acceptable performance did not include benchmarks for the practical assessment, and therefore did not provide guidance for assessors to ensure the requirements of the unit of competency would be addressed in the practical assessment.

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

#### TLILIC3003A Licence to operate a bridge and gantry crane

 Provide a full suite of assessment tools that meet regulatory requirements, meet the requirements of the Training Package, ensures assessment is conducted in accordance with the principles of assessment and the rules of evidence and are supported by criteria defining acceptable performance and instructions providing guidance on specific unit requirements for assessors.

#### **RII20712 Certificate II in Civil Construction**

CPCCLRG3001A Licence to perform rigging basic level

• Provide a full suite of assessment tools that meet the requirements of the relevant Training Package and are supported by criteria defining acceptable performance and instructions providing guidance on specific unit requirements for assessors, and are systematically validated.

#### RIIOHS202A Enter and work in confined spaces

• Provide evidence assessment tools are accompanied by sufficient instructions to students and assessors to ensure consistency would be achieved between assessors.

#### TLI31210 Certificate III in Driving Operations

TLIF2010A Apply fatigue management strategies

• Provide evidence assessment tools are accompanied by sufficient instructions to students and assessors to ensure consistency would be achieved between assessors.

#### Analysis of rectification evidence:

#### TLILIC3003A Licence to operate a bridge and gantry crane

 The organisation provided a full suite of assessment tools that meet regulatory requirements, meet the requirements of the Training Package, ensures assessment is conducted in accordance with the principles of assessment and the rules of evidence and are supported by criteria defining acceptable performance and instructions providing guidance on specific unit requirements for assessors.

#### RII20712 Certificate II in Civil Construction

CPCCLRG3001A Licence to perform rigging basic level

 The organisation provided a full suite of assessment tools that meet the requirements of the relevant Training Package and are supported by criteria defining acceptable performance and instructions providing guidance on specific unit requirements for assessors, and are systematically validated.

RIIOHS202A Enter and work in confined spaces

• The organisation provided evidence assessment tools are accompanied by sufficient instructions to students and assessors to ensure consistency would be achieved between assessors.

#### TLI31210 Certificate III in Driving Operations

TLIF2010A Apply fatigue management strategies

- The organisation provided evidence assessment tools are accompanied by sufficient instructions to students and assessors to ensure consistency would be achieved between assessors.
- SNR 16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:
- 16.1 The NVR registered training organisation establishes the needs of clients, and delivers services to meet these needs.

Original finding: Compliant

Following rectification: n/a

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

Original finding: Compliant

Following rectification: n/a

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

Original finding: Compliant

Following rectification: n/a

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

Original finding: Compliant

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

**Original finding:** Compliant

Following rectification: n/a

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

**Original finding:** Compliant

Following rectification: n/a

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

Original finding: Compliant

Following rectification: n/a

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

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

**Original finding:** Compliant

Following rectification: n/a

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

Original finding: Compliant

Following rectification: n/a

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

**Original finding:** Compliant

Following rectification: n/a

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

Original finding: Not compliant	Following rectification: Compliant
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Reasons for finding of non-compliance:

• The organisation did not ensure that records are managed to ensure their accuracy and integrity. Student files reviewed for *RII20712 Certificate II in Civil Construction, RII30809 Certificate III in Civil Construction Plant Operations* and *TLI31210 Certificate III in Driving Operations* were found to hold incorrect versions of assessment tools in all cases. Although the organisation had a mechanism to ensure that trainer/assessors were using correct versions of assessment tools, it was not being monitored or managed.

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

• Provide evidence of the monitoring of its mechanism to ensure that records are managed to ensure accuracy and integrity.

Analysis of rectification evidence:

- The organisation provided its 'Version Control Policy' document which ensures records are managed to ensure accuracy and integrity.
- The organisation provided evidence its trainer/assessors had been informed of the updated 'Version Control Policy' document.

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 non-compliances identified demonstrated the organisation's Chief Executive has not ensured compliance with the VET Quality Framework across all of its operations.

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

• Evidence provided to satisfactorily address the non-compliances identified at audit will demonstrate the organisation's Chief Executive has ensured compliance with the VET Quality Framework across all of its operations.

Analysis of rectification evidence:

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

**Original finding:** Compliant

Following rectification: n/a

#### SNR 19 Interactions with the National VET Regulator

19.1 The NVR registered training organisation must co-operate with the National VET Regulator:(a) in the conduct of audits and the monitoring of its operations;

(b) by providing accurate and timely data relevant to measures of its performance;

(c) by providing information about significant changes by its operations;

(d) by providing information about significant changes to its ownership; and

(e) in the retention, archiving, retrieval and transfer of records consistent with National VET Regulator's requirements.

**Original finding:** Compliant

#### 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:** Compliant 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:** Compliant 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 nonrefundable 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

**SNR 20** 

**Compliance with legislation** 

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; [option 2 not currently available]

(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. [option 5 not currently available]

Original finding: Compliant

Following rectification: n/a

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

23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:

(a) meets the Australian Qualifications Framework (AQF) requirements;

(b) identifies the NVR registered training organisation by its national provider number from the National Register and

(c) includes the NRT logo in accordance with its current conditions of use.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

• The organisation did not demonstrate its qualification or statement of attainment meets the AQF qualifications issuance policy or meets the NSSC Policy application of the AQF qualifications issuance policy within the vet sector.

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

• Provide evidence to demonstrate its qualification and statement of attainment meets the AQF qualifications issuance policy or meets the NSSC Policy application of the AQF qualifications issuance policy within the vet sector.

Analysis of rectification evidence:

• At the time of audit, the organisation provided evidence to demonstrate its qualification and statement of attainment meets the AQF qualifications issuance policy or meets the NSSC Policy application of the AQF qualifications issuance policy within the vet sector.

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:** Compliant

### 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:** Compliant

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:** Compliant

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: Compliant