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

ORGANISATION DETAILS

Organisation's legal name	**Australian Training Institute (ATI) Pty Ltd**
Trading name/s	Australian Training Institute
RTO number	30200
CRICOS number	n/a

AUDIT TEAM

Lead auditor	Rainer Wilton
Auditor/s	Sarah Dew, Dan Taylor
Technical adviser/s	n/a

AUDIT DETAILS

Application number/s	n/a	
Audit number/s	1006763	
Audit reason 1	Other - specify: Strategic Industry Review	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	Shop 6 & 7, 51 BRIGHTON RD SANDGATE QLD 4017	
Date/s of audit	12/09/2014	
Organisation's contact for audit	Mr Jason Naylor	CEO
	jason.naylor@atiaustralia.edu.au	1300 738 850
NVR standards audited	Selected Standards for Continuing Registration: 15.2, 15.3, 15.4, 15.5, 16.3, 16.5, 17.3, 17.4, 20.1, 20.2, 23.1, 23.2, 24.1, 25.1	

BACKGROUND

This audit is being conducted as part of the Strategic Industry Review into training for the Security industry, under the authority of Section 35 (2) of the *National Vocational Education & Training Regulator Act 2011.* ASQA is conducting a number of these audits across Australia.

This Review is being conducted because of concerns raised about the quality of the training and assessment provided by some Registered Training Organisations (RTOs), by coroners, regulators,
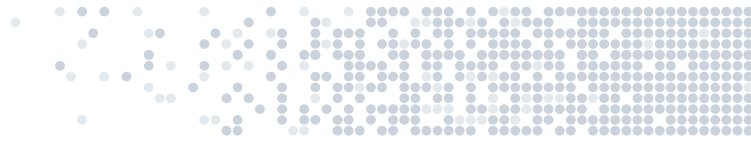
employers and the industry generally

The findings of the Strategic Industry Review will be published. No names of RTOs will be included in the Review report.

The Australian Training Institute (ATI) Pty Ltd (trading as Australian Training Institute) is an Australian Proprietary Company, Limited By Shares and was first registered with ASIC, in its current form, on 17/02/2011. The company delivers training and assessment from the Business Services, Community Services, Property Services (security), and Tourism, Travel and Hospitality (hospitality) training packages. Its scope of registration includes 15 qualifications, 59 units of competency, and three accredited courses. Initial registration as an RTO is listed as 1998.

The CEO of the RTO is Jason Naylor. Supporting the CEO are five part time administration staff (positions are Receptionist, Co Provider Officer, Administration Officer, Accounts Officer, and Project and Compliance Officer). The CEO is responsible for overall RTO compliance and management (including the delivery of training and assessment), with each supporting officer having duties relating to their position.

The main business activities conducted by the RTO are security training and assessment (approx. 50% of business), short courses in mining (20%) and other programs from its scope (20%). The CEO operates a separate safety and security consultancy 'International Risk Management'.

The primary clients of the NRT business activities are existing workers seeking to enter the industry (no security experience), and jobseekers (may be from disadvantaged backgrounds).

The RTO's NRT revenue is derived from fee for service activities (40%) and the QLD Government Certificate III Guarantee (60%). The RTO has established approximately 8 'co provider' subcontracting arrangements with trainers and assessors.

The delivery mode of the security NRT is face to face class room based, including some out of session self-directed learning. The RTO delivers security training in QLD (Sandgate), SA (Port Lincoln), WA (Perth), and is preparing for delivery in NSW.

The RTO's primary marketing activities include website, social media (Facebook, Gumtree), newspaper advertisements, and word of mouth referrals.

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

- 10

AUDIT SAMPLE			
Code	**Qualification/Course/Unit name**	**Mode/s of delivery/assessment***	**Current enrolments** (If not yet on scope, record N/A)
CPP20211	Certificate II in Security Operations	Face to face	5
~~CPP20212~~	~~Certificate II in Security Operations~~		~~NA~~
CPP30411	Certificate III in Security Operations	Face to face	5

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

INTERVIEWEES		
Name	**Position**	**Qualification/Course/Unit code/s**
Jason Naylor	CEO	CPP20211, CPP30411

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

**Audit finding as at 30/09/2014: Critical 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 04/12/2014: Compliant

AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	Compliant
SNR 16	Not compliant	Compliant
SNR 17	Compliant	n/a
SNR 18	Not audited	n/a
SNR 19	Not audited	n/a
SNR 20	Compliant	n/a
SNR 21	Not audited	n/a
SNR 22	Not audited	n/a
SNR 23/AQF	Not compliant	Compliant
SNR 24	Not compliant	Compliant
SNR 25	Compliant	n/a
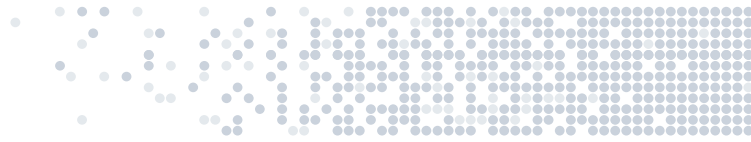
SNR 15	The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:

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

Original finding: 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:

CPP20212 Certificate II in Security Operations
CPP30411 Certificate III in Security Operations

The organisation provided a learning and assessment strategy for each of the above listed qualifications.

The evidence provided does not demonstrate that the strategies for training and assessment meet the requirements of the CPP07 Property Services Training Package for the specific reasons as described below.

CPP20212 Certificate II in Security Operations

The strategy for the above listed qualification does not:

- meet training package requirements. The RTO is delivering a total of 16 units of competency packaged within the CPP20212 Certificate II in Security Operations. The qualification framework of the qualification requires that a total of 12 units are delivered to achieve the qualification.
- identify how assessment processes will assess the practical application of the requirements of any given unit, but specifically for the unit *CPPSEC2004B Respond to security risk situations*.

CPP30411 Certificate III in Security Operations

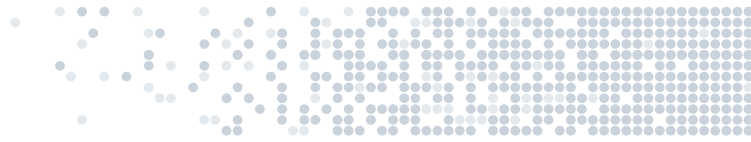The strategy for the above listed qualification does not:

- identify how assessment processes will assess the practical application of the requirements of any given unit, but specifically for the units *CPPSEC3002A Manage conflict through negotiation* and *CPPSEC3007A Maintain security of environment*.

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

CPP20212 Certificate II in Security Operations

Provide a revised training and assessment strategy for the above listed qualification which meets the requirements of the CPP07 Property Services Training Package, including that it:

- meets all packing requirements of the qualification
- identifies how assessment processes will assess the practical application of the requirements of any given unit, including *CPPSEC2004B Respond to security risk*

situations.

CPP30411 Certificate III in Security Operations

Provide a revised training and assessment strategy for the above listed qualification which meets the requirements of the CPP07 Property Services Training Package, including that it:

- identifies how assessment processes will assess the practical application of the requirements of any given unit, including *CPPSEC3002A Manage conflict through negotiation* and *CPPSEC3007A Maintain security of environment.*

Analysis of rectification evidence:

CPP20212 Certificate II in Security Operations

The organisation provided revised training and assessment strategies for the above listed qualification which meet the requirements of the CPP07 Property Services Training Package, which specifically:

- meets all packing requirements of the qualification
- identifies how assessment processes will assess the practical application of the requirements of any given unit, including CPPSEC2004B Respond to security risk situations.

CPP30411 Certificate III in Security Operations

The organisation provided revised training and assessment strategies for the above listed qualification which meet the requirements of the CPP07 Property Services Training Package, which specifically:

- identify how assessment processes will assess the practical application of the requirements of any given unit, including CPPSEC3002A Manage conflict through negotiation and CPPSEC3007A Maintain security of environment.

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:

CPP20212 Certificate II in Security Operations
CPP30411 Certificate III in Security Operations

The organisation provided the following evidence:

- For the training and assessment strategy, refer to SNR 15.2
- For staff, refer to SNR 15.4
- For assessment material, refer to SNR 15.5
- Review of equipment and facilities at the RTO's premises
- Evidence of industry consultation.

The evidence provided did not demonstrate that the organisation's assessment materials are consistent with the requirements of the CPP07 Property Services Training Package.

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

CPP20212 Certificate II in Security Operations
CPP30411 Certificate III in Security Operations
Rectification of the non-compliances identified in SNR 15.5 will demonstrate that assessment materials are consistent with the requirements of the CPP07 Property Services Training Package.

Analysis of rectification evidence:

- Non-compliances identified in SNR 15.5 were rectified demonstrating that assessment materials are consistent with the requirements of the CPP07 Property Services Training Package.

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: Compliant	**Following rectification:** 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:

CPP20212 Certificate II in Security Operations
CPPSEC2004B Respond to security risk situation

- Assessment tools consist of:
  - clustered assessment (CPPSEC2004A, CPPSEC3003A) consisting of 10 short answer written questions
  - mapping document showing the relationship between the assessment tool and the unit
  - marking guide for assessors.
- The assessment tools provided do not meet the requirements of the CPP07 Property Services Training Package; specifically all demonstrable requirements of the elements to the level defined in the performance criteria, required skills, and critical aspects for assessment. For example, but not limited to:
  - Appropriate response to identified security risk situation is determined and

implemented in accordance with organisational procedures

  - o A person who demonstrates competency in this unit must be able to provide evidence of responding to a security risk in a manner that is appropriate for the situation, compliant with applicable legislation and regulations, and within scope of own competence and authority' not being assessed.
- As practical aspects of the unit are not assessed, the evidence did not demonstrate that assessment is conducted in accordance with the principles of assessment (including validity and reliability), or the rules of evidence (including validity and sufficiency).
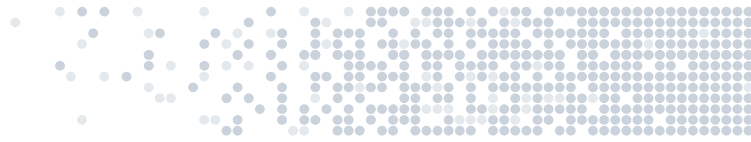
CPP30411 Certificate III in Security Operations

CPPSEC3002A Manage conflict through negotiation

- Assessment tools consist of:
  - o assessment consisting of 7 short answer questions (based on case studies, including multiple sub questions)
  - o mapping document showing the relationship between the assessment tool and the unit
  - o marking guide for assessors.
- The assessment tools provided do not meet the requirements of the CPP07 Property Services Training Package; specifically all demonstrable requirements of the elements to the level defined in the performance criteria, and critical aspects for assessment. For example, but not limited to:
  - o Negotiation techniques are used to maintain positive interaction, divert and minimise aggressive behaviour
  - o Effectiveness of response is reviewed and evaluated in accordance with organisational procedures.
- As practical aspects of the unit are not assessed, the evidence did not demonstrate that assessment is conducted in accordance with the principles of assessment (including validity and reliability), or the rules of evidence (including validity and sufficiency).

CPPSEC3007A Maintain security of environment

- Assessment tools consist of**:**
  - o assessment consisting of 7 short answer questions (based on case studies, including multiple sub questions)
  - o mapping document showing the relationship between the assessment tool and the unit
  - o marking guide for assessors.
- The assessment tools provided do not meet the requirements of the CPP07 Property Services Training Package; specifically all demonstrable requirements of the elements to the level defined in the performance criteria, critical aspects for assessment, and the context of and specific resources for assessment. For example, but not limited to:
  - o Response is formulated and carried out within scope of own role, competence and authority
  - o A setting in the workplace or environment that simulates the conditions of performance described in the elements, performance criteria and range statement.
- As practical aspects of the unit are not assessed, the evidence did not demonstrate that assessment is conducted in accordance with the principles of assessment (including validity and reliability), or the rules of evidence (including validity and sufficiency).

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

CPP20212 Certificate II in Security Operations
CPPSEC2004B Respond to security risk situation
CPP30411 Certificate III in Security Operations
CPPSEC3002A Manage conflict through negotiation
CPPSEC3007A Maintain security of environment

- For each unit of competency listed above, provide a complete set of assessment materials to demonstrate assessment addresses all requirements of the CPP07 Property Services Training Package, and to demonstrate assessment will be undertaken in accordance with the principles of assessment and rules of evidence.

Analysis of rectification evidence:

CPP20212 Certificate II in Security Operations

CPPSEC2004B Respond to security risk situation

CPP30411 Certificate III in Security Operations

CPPSEC3002A Manage conflict through negotiation

CPPSEC3007A Maintain security of environment

- For each unit of competency listed above, the organisation provided a complete set of amended assessment materials which address all requirements of the CPP07 Property Services Training Package, and demonstrated assessment is undertaken in accordance with the principles of assessment and rules of evidence.

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

| 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: Not compliant	**Following rectification:** Compliant

Reasons for finding of non-compliance:

- The RTO provided pre-course information and flyers. The RTO website was also reviewed at: http://www.atiaustralia.edu.au/.
- The evidence provided does not support compliance with the requirements of SNR 16.3. The RTO website continues to market the CPP20211 Certificate II in Security Operations. This qualification is superseded and teach out periods have expired.
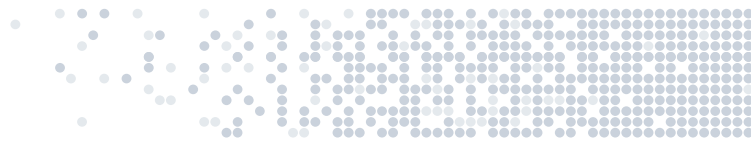
In order to become compliant, the organisation is required to:

- Demonstrate that on the RTO's website and prior to enrolment, students are informed about the training, assessment and support services to be provided, and about their rights and obligations.

Analysis of rectification evidence:

- The RTO's website, http://www.atiaustralia.edu.au/, has been updated to ensure it is only advertising current qualifications that are listed on its scope of registration.

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

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

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

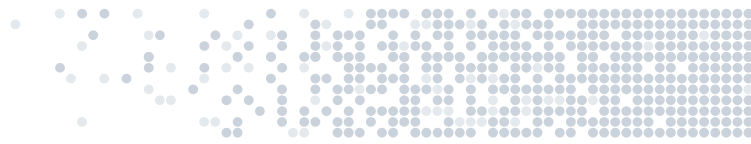| 22.2	The NVR registered training organisation must provide the following fee information to each client: (a) the total amount of all fees including course fees, administration fees, materials fees and any other charges; (b) payment terms, including the timing and amount of fees to be paid and any non-refundable 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 compliant   **Following rectification:** Compliant

Reasons for finding of non-compliance:

The RTO provided a copy of a full qualification and a Statement of Attainment. The evidence provided does not support compliance with SNR 23.1 as:

- the Statement of Attainment does not include the words "A Statement of Attainment is issued by a Registered Training Organisation when an individual has completed one or more accredited units"

- the RTO is issuing a full qualification listing numbers of units in excess of the CPP Property Services Training Package qualification structure requirements, rather than a qualification and a Statement of Attainment listing the additional units.

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

- provide evidence that its VET Qualifications and Statements of Attainment meets the Australian Qualification Framework (AQF) Requirements for the CPP20212 Certificate II in Security Operations qualification and any Statement of Attainment it may issue for additional units delivered to meet licensing outcomes.

Analysis of rectification evidence:

- The organisation provided copies of its statement of attainment and VET qualification templates that meet the Australian Qualification Framework (AQF) Requirements.

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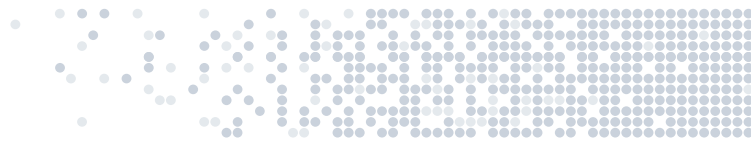
23.3	The NVR registered training organisation must retain client records of attainment of units of competency and qualifications for a period of 30 years.

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 organisation provided pre-course information and flyers. The RTO website was also reviewed at: http://www.atiaustralia.edu.au/.
- The evidence provided does not support compliance with the requirements of SNR 24.1 as the RTO website continues to market the CPP20211 Certificate II in Security Operations. This qualification is superseded and teach out periods have expired.

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

- The organisation is required to provide evidence to demonstrate that its marketing materials are accurate and ethical.

Analysis of rectification evidence:

- The organisation provided evidence which demonstrates its marketing materials are accurate and ethical, specifically;
  - the organisation has made corrections to its CPP20212 Certificate II in Security Operations flyer, and updated its website.

| 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
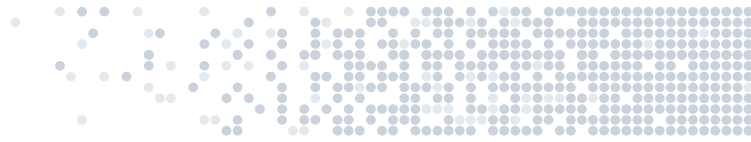
currently VET accredited courses.

Original finding: Compliant   **Following rectification:** n/a