

Audit report – VET Quality Framework

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

ORGANISATION DETAILS

Organisation's legal name	CLB Training and Development Pty Ltd as the Trustee for the CLB Unit Trust
Trading name/s	CLB Training and Development Pty Ltd, Spectra Training Australia
RTO number	21356
CRICOS number	N/A

AUDIT TEAM

Lead auditor	Christine Williams
Auditor/s	David Scott
Technical adviser/s	N/A

AUDIT DETAILS

Application number/s	1043970	
Audit number/s	1003648	
Audit reason 1	Application - renewal	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	100 Dorcas Street, south Melbourne	
Date/s of audit	13, 14 & 15 August 2013	
Organisation's contact for audit	Gary Cobbledick gary.cobbledick@spectra-training.com	CEO 929 28000
NVR standards audited	Selected Standards for Continuing Registration: SNR 15, 16, 17, 18, 20, 22.2	

BACKGROUND

- The organisation was founded in 2003 as CLB Training and Development with a focus on sales, customer service and business qualifications. In 2008, the business was converted to a Trust structure and by 2010 had 35 employees occupying the one office in Melbourne.
- The business was acquired by the current owners in mid-2010 and a new management team was assembled with an Advisory Board being established. By 2012, the organisation grew to 100 employees



with 5 offices throughout Australia (Melbourne 75 staff, Sydney 10 staff, Brisbane 8 staff, Perth 6 staff and South Australia being a 'home' office with 1 staff member.

- The RMIT printing apprenticeship was established mid-2012, and the scope extended to include 3 printing apprenticeships.
- In March 2013, the business was renamed 'Spectra Training' and in mid-2013 engineering apprenticeships were added to scope.
- The main areas of traineeship focus are: manufacturing, logistics, management and retail with apprenticeships in printing/pre-press/print finishing and in engineering.
- Key clients are large manufacturers, printers, transport companies and large retailers and service companies.
- Ownership structure is a joint venture / shareholder agreement with a Board of Directors and an Executive management team.
- The organisation was audited for its SIR07 Training Package qualifications that are being superseded as they still have a small number of students in their final stages of their training. The organisation is intending to remove these qualifications prior to the end of teach out.

Total number of current enrolments in RTO as at audit date: 1,758

- The current number of students, 3,504 includes students where their employer has contracted with the organisation within the week prior to the audit site visit, however training has not yet started and actual numbers have not yet been finalised with corporate clients.

AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
BSB40312	Certificate IV in Customer Contact	Workplace face-to-face	15
BSB51107	Diploma of Management		137
CHC50908	Diploma of Children's Services (Early childhood education and care)		2
ICP30710	Certificate III in Printing and Graphic Arts (Print Finishing)		438
MEM30305	Certificate III in Engineering – Fabrication Trade		13
MSA30107	Certificate III in Process Manufacturing		188
MSS40312	Certificate IV in Competitive Systems and Practices		685
SIR30207	Certificate III in Retail		25
SIR40207	Certificate IV in Retail Management		64
SIT30707	Certificate III in Hospitality		2
TAE40110	Certificate IV in Training and Assessment		7
TLI31210	Certificate III in Driving Operations		158
TLI42010	Certificate IV in Logistics		24

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

INTERVIEWEES



Name	Position	Qualification/Course/Unit code/s
Gary Gobbledick	CEO and Managing Director	N/A
Brent McGregor	GM-Training Solutions & Quality	N/A
Shruti Nargundkar	Quality and compliance Manager	N/A
Caitlin Ryan	Quality compliance officer	N/A
Vanessa Hoppe	GM-apprenticeships and Training Operations	N/A
Shayne Van Der Heine	Operation Manager Engineering	MEM30305, MEM30205, MEM40105
Billy Worth	Program Coordinator Bus/service	BSB40312, BSB40812, SIT30707
Paul Ross	Operations Mgr Printing	ICP30710, ICP30510
Daniel Gregory	Program coord/trainer assessor	TLI31210, TLI42010
Scott Grewcock	Program coordinator/trainer assessor	MSA30107, MSS40312

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 15/08/2013: Minor non-compliance

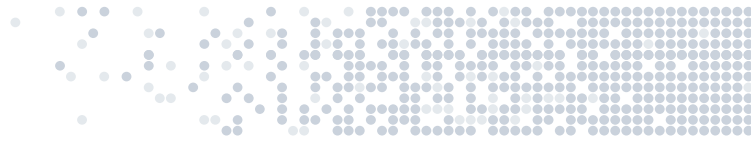
- The level of non-compliance considers the potential for an adverse impact on the quality of training and assessment outcomes for students.
- If non-compliance has been identified, this audit report describes evidence of the non-compliance.
- Refer to notification of non-compliance for information on providing further evidence of compliance.

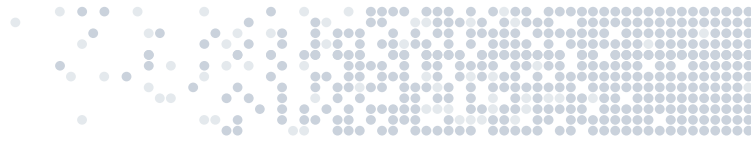
AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on dd/mm/yyyy: n/a

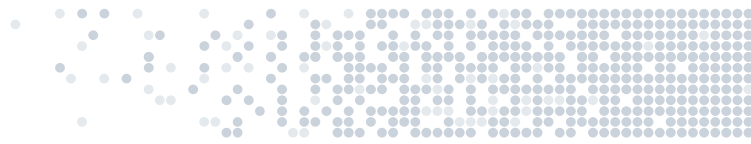
AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	n/a
SNR 16	Compliant	n/a
SNR 17	Not compliant	n/a
SNR 18	Not compliant	n/a
SNR 19	Not audited	n/a
SNR 20	Compliant	n/a
SNR 21	Not audited	n/a
SNR 22	Compliant	n/a
SNR 23/AQF	Not audited	n/a
SNR 24	Not audited	n/a
SNR 25	Not audited	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: n/a
<i>Reasons for finding of non-compliance:</i>	
<ul style="list-style-type: none">The organisation has developed a strategy for the delivery of each qualification on its scope of registration plus additional strategies are developed for the delivery to individual corporate clients. However, the overarching strategies do not reflect the actual units of competency within a qualification that the organisation is able to offer a client. Therefore, the organisation is, in effect, placing itself in the position of being able to offer all units of competency listed within each qualification.	
<i>In order to become compliant, the organisation is required to:</i>	
<ul style="list-style-type: none">Provide the amended overarching (generic) strategy it has developed for each of the following qualifications.<ul style="list-style-type: none">BSB40312, BSB51107, ICP30710, MEM30305, MSA30107, MSS40312, SIR30207, SIR40207 TLI31210, TLI42010The strategies need to identify any units the organisation is unable to offer or the alternative approach to negotiate with the client to meet their needs; all units listed under the organisation's current format are subject to evaluation through the audit process.	
<i>Analysis of rectification evidence:</i>	
<ul style="list-style-type: none">Evidence yet to be supplied	
<i>Reasons for outstanding non-compliance:</i>	
<ul style="list-style-type: none">Not applicable at this time	
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: Compliant	Following rectification: n/a
15.4 Training and assessment is delivered by trainers and assessors who: (a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors; and (b) have the relevant vocational competencies at least to the level being delivered or assessed; and (c) can demonstrate current industry skills directly relevant to the training/assessment	



**being undertaken; and
(d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.**

Original finding: Not compliant

Following rectification: n/a

Reasons for finding of non-compliance:

- The organisation provided evidence of a rigorous process for engaging suitably qualified trainers/assessors with relevant and current industry background and TAE40110 (assessor qualifications). However, several of the trainers/assessors do not hold the relevant qualification for which they are to conduct training assessment and the evidence provided did not sufficiently identify that trainers/assessors demonstrated equivalence (where they do not hold the relevant qualification) and in some cases the recording of industry currency evidence was insufficient. At the audit site visit several assessors were interviewed which verbally evidenced that the organisation engages suitably qualified staff. However, the following assessor's files fall short of evidencing the required equivalence and currency. Whilst the audit accepts the shortfall to be administrative in nature, rather than the engagement of unqualified assessors, the organisation's own procedure has not been implemented.

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

- Provide evidence of:
 - demonstrated equivalence plus current industry skills directly relevant to the training/assessment being undertaken for the following trainers/assessors:
 - Peter Rivet - ICP30710 Certificate III in Printing and Graphic Arts (Print Finishing)
 - Scott Grewcock – MSS40312 Certificate IV in Competitive Systems and Practices
 - Jacqui Hannah – SIR30207 Certificate III in Retail
 - Julia Jackson – SIR40207 Certificate IV in Retail Management
 - Bill Pawley – TLI31210 Certificate III in Driving Operations
 - Amdrew Gifford – TLI42010 Certificate IV in Logistics

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

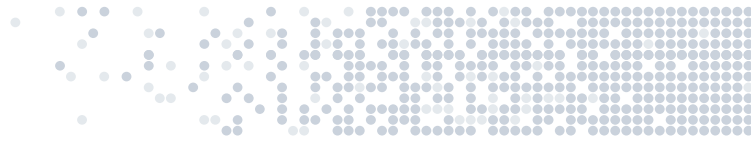
**15.5 Assessment including Recognition of Prior Learning (RPL):
(a) meets the requirements of the relevant Training Package or VET accredited course; and
(b) is conducted in accordance with the principles of assessment and the rules of evidence; and
(c) meets workplace and, where relevant, regulatory requirements; and
(d) is systematically validated.**

Original finding: Not compliant

Following rectification: n/a

Reasons for finding of non-compliance:

- BSB51107 Diploma of Management
BSBSUS501A Develop workplace policy and procedures for sustainability:
Whilst the assessment instruments align to the requirements of the Training Package unit of competency, some student's assessments had been marked correct when the answer appeared to be incorrect for example, students 27289 Asheek Karan and 27295 David McFadden were marked as having correctly answered question 1 when the question related to sustainability yet the answers provided by the students did not appear to have any relevance to the question. Further, additional questions had no evidence of assessment for example, no



ticks or comments to indicate that the assessor had assessed the student’s work. Whilst it was established during the audit process that the assessor had communicated the outcome of the assessments with the students through email, the organisation’s procedure was not carried out and monitoring/validation of completed assessments had not realised this administrative error on behalf of the assessor. Further, the organisation was unable to provide evidence/advice to the auditor as to why question 1 was marked as corrected (ie ticked) when the answer appeared to be incorrect.

- ICP30710 Certificate III in Printing and Graphic arts (Print Finishing)
ICPSU202C Prepare, load and unload product on and off machine:
Where there appeared to be a gap in the assessment instrument for this unit of competency, the organisation’s technical expert was able to explain how and where the gap would be assessed for example, within the practical demonstration and the project. However, the guidelines for assessment had not been fully implemented and therefore there was insufficient evidence that, for example, ‘watermarks identified in substrates’ would be assessed and that there would be consistency amongst assessors for the valid assessment of all aspects of the unit.

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

- BSB51107 Diploma of Management
BSBSUS501A Develop workplace policy and procedures for sustainability:
Provide the process it has implemented to ensure sufficient instruction is provided to assessors regarding the diligence in recording the evaluation of student assessments for all units of competency within each qualification and, by way of an example, provide a copy of this revised instruction for *BSBSUS501A Develop workplace policy and procedures for sustainability*. Evidence to include instruction on the recording of oral questioning such as the question posed and answers provided that equate to a decision of a satisfactory/not satisfactory assessment outcome.
- ICP30710 Certificate III in Printing and Graphic arts (Print Finishing)
ICPSU202C Prepare, load and unload product on and off machine:
Provide the completed assessment instruments for the above unit of competency which include guidelines for consistency amongst assessors.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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.

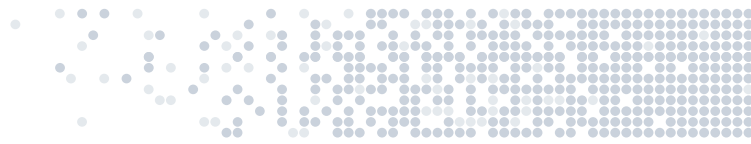
Original finding: Compliant

Following rectification: n/a

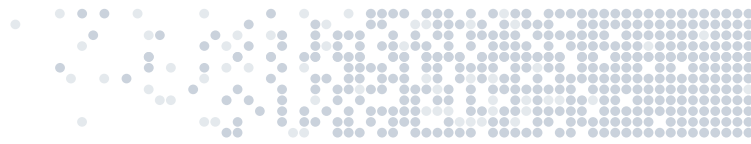
16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.

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	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: 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: Not audited	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: n/a
	<i>Reasons for finding of non-compliance:</i>		



- The organisation has not managed the accurate recording of information required within SNR 15.2, 15.4 and 15.5. Whilst the instruments themselves are compliant the information to be recorded within the instruments is in some cases inaccurate or non-existent.

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

- Provide:
 - its revised strategy which the organisation’s Business Officers use for guidance on negotiation of units of competency to be included in client agreements as noted at SNR 15.2.
 - additional evidence the organisation requires its trainers/assessors to provide to sufficiently evidence qualifications/equivalence, and industry currency, as per the organisation’s procedure, and as required under SNR 15.4.
 - additional instructions to assessors on the accurate recording of evaluation of student’s assessments including the questions and context of answers for recording of oral questioning as required under SNR 15.5.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: n/a

18.1 Reasons for finding of non-compliance:

- The CEO was unable to demonstrate that the organisation fully complies with the VET Quality Framework.

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

- Provide evidence that the CEO has ensured the organisation meets the VET Quality Framework requirements.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: 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: 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: 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: 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; [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: Not audited

Following rectification: n/a

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

23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:
(a) meets the Australian Qualifications Framework (AQF) requirements;
(b) identifies the NVR registered training organisation by its national provider number from the National Register and
(c) includes the NRT logo in accordance with its current conditions of use.

Original finding: Not audited

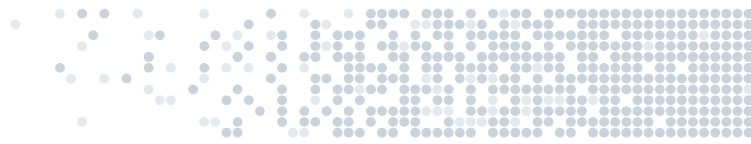
Following rectification: n/a

23.2 The NVR registered training organisation must recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.

Original finding: Not audited

Following rectification: n/a

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



Original finding: Not audited

Following rectification: n/a

23.4 The NVR registered training organisation must provide returns of its client records of attainment of units of competency and VET qualifications to the National VET Regulator on a regular basis, as determined by the National VET Regulator. [no requirements currently exist]

This element was not audited.

23.5 The NVR registered training organisation must meet the requirements for implementation of a national unique student identifier. [no requirements currently exist]

This element was not audited.

SNR 24 Accuracy and integrity of marketing

24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

Original finding: Not audited

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: Not audited

Following rectification: n/a

25.2 The NVR registered training organisation must manage the transition from superseded VET accredited courses so that it delivers only currently endorsed Training Packages or currently VET accredited courses.

Original finding: Not audited

Following rectification: n/a