



Audit report – VET Quality Framework

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

ORGANISATION DETAILS

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|---------------------------|---|
| Organisation's legal name | Pass Global Pty Ltd |
| Trading name/s | Australian Learning Training and Education Centre |
| RTO number | 22034 |
| CRICOS number | 02926D |

AUDIT TEAM

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|---------------------|----------------|
| Lead auditor | Jane Connellan |
| Auditor/s | n/a |
| Technical adviser/s | n/a |

AUDIT DETAILS

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|----------------------------------|--|---------------------|
| Application number/s | 1038320 | |
| Audit number/s | 1003407 | |
| Audit reason 1 | Application - renewal | |
| Audit reason 2 | n/a | |
| Audit reason 3 | n/a | |
| Activity type | Site visit | |
| Address of site/s visited | 574 St Kilda Road Melbourne VIC 3004 | |
| Date/s of audit | 13/06/2013 | |
| Organisation's contact for audit | Pankaj Goel pankaj@altec.vic.edu.au | CEO 03 9529 1783 |
| NVR standards audited | Selected Standards for Continuing Registration: SNR 15, 16, 17, 18, 20 and 22.2 | |

BACKGROUND

- The organisation has 8 BSB, 1 CUF, 4 FNS, 4 ICA and 1 ICP qualifications on its scope of registration. These qualifications are registered for delivery in Victoria. The organisation had previously notified ASQA of its intent to deliver training and assessment in Sri Lanka but has recently notified ASQA that it wishes to remove this planned delivery location.
- The organisation is CRICOS registered with a capacity of 696 international students. Its current percentage of studying CoEs against total capacity is 58.5%.
- The organisation receives funding from Skills Victoria.
- The organisation uses an ISO quality system and has recently engaged the services of Chloe Dyson to conduct an internal audit.

- The organisation is not engaged in any partnership arrangements; however, engages training and assessment staff on a contract arrangement.
- The organisation is focusing on expanding its domestic market.

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

58

AUDIT SAMPLE

| Code | Qualification/Course/Unit name | Mode/s of delivery/assessment* | Current enrolments (if not yet on scope, record N/A) |
|----------|---|--------------------------------|---|
| BSB40507 | Certificate IV in Business Administration | Mixed, face to face | 3 |
| BSB60507 | Advanced Diploma of Marketing | Face to face | 0 |
| FNS60210 | Advanced Diploma of Accounting | Face to face | 15 |
| ICA40411 | Certificate IV in Networking | Face to face | 23 |
| 21939VIC | Certificate III in ESL (Further Study) | Face to face | 8 |

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

INTERVIEWEES

| Name | Position | Qualification/Course/Unit code/s |
|----------------|---|----------------------------------|
| Pankaj Goel | CEO | n/a |
| Vivek Sharma | Member Academic Board | n/a |
| Khushboo Gupta | Quality Assurance Manager | n/a |
| Gail Baker | General Manager Marketing/Admissions | n/a |

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 14/06/2013: 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 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 | Compliant | n/a |
| SNR 18 | Not compliant | n/a |
| SNR 19 | Not audited | n/a |
| SNR 20 | Not 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: Compliant

Following rectification: n/a

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:

- **ICA40411 Certificate IV in Information Technology Networking**

On the day of the audit the organisation was unable to demonstrate that it had access to training resources for all units of competency within its training and assessment strategy for this qualification. The organisation identified it had left the development and supplying of training resources, to support the trainer guides that were available, up to the trainers and assessors and confirmed there had been recent changes to training and assessment staff in this area. Conversations on the day of the audit with trainer and assessor Rudy Drew confirmed he had access to training resources for units of competency related to CISCO; however, as the other trainer and assessor was not at the audit the organisation could not confirm it had access to training materials for the units of competency that did not relate to CISCO training. *Prior to the audit report being sent the organisation forwarded a resource list for this qualification that identified the training resources available including text book references and links to further support resources that are available on the internet. No further evidence is required.*

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: Compliant

Reasons for finding of non-compliance:

- **BSB60507 Advanced Diploma of Marketing**

The organisation does not currently have any enrolments in this qualification. On the day of the audit the organisation was unable to provide evidence that the trainer and assessor originally put forward for this qualification, Miroslav Cincura, had relevant and current marketing experience. It was noted the organisation was looking at replacing Miroslav Cincura with

another trainer and assessor. Prior to the audit report being sent the organisation forwarded a resume for a new trainer and assessor for this qualification, Chris Hewson. Chris holds the necessary training and assessment and vocational competencies, has current industry skills and has continued to maintain his VET knowledge and trainer and assessor competence. No further evidence is required.

- **21939VIC Certificate III in ESL (Further Study)**

On the day of the audit the organisation was unable to demonstrate the trainer and assessor for this qualification, Victoria Higgins, met the additional 'Vocational competency requirements of teachers' from the accredited course: 'A qualified TESOL teacher is a person who holds a postgraduate qualification that includes a supervised teaching practicum in TESL/TESOL or a 4-year B Education qualification with a TESL/TESOL method'. *Approved qualifications include:

- B Ed with TESL/TESOL as a method
- Diploma of Education with TESL/TESOL as a method
- TESL/TESOL within Graduate Certificate in Education
- Graduate Certificate in TESL/TESOL
- Graduate Diploma in TESL/TESOL
- Appropriate Masters degrees which include a TESOL specialisation such as: Masters of Arts (TESL/TESOL), Masters of Teaching, Masters of Applied Linguistics'.

Prior to the audit report being sent the organisation forwarded a resume for a new trainer and assessor for this course, Joseph Slaiwa. Joseph holds the necessary training and assessment and vocational competencies including a Graduate Certificate in TESOL, has current industry skills and as part of his induction the organisation has ensured his VET knowledge and trainer and assessor competence has been maintained. No further evidence is required.

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:

- **BSB40507 Certificate IV in Business Administration**

BSBINM401A Implement workplace information systems

The assessment tools consist of an Aspire resource that requires the student to have access to a workplace. One of the delivery modes the organisation uses for this qualification is face to face to students that do not necessarily have access to a workplace. The resource is therefore not appropriate for the organisation's delivery mode or student cohort. As a result of students not having access to a workplace they would not be able to complete all the assessment activities and therefore sufficient evidence would not be gathered to support a student satisfactorily addressed all the training package requirements as outlined in the unit of competency.

- **BSB60507 Advanced Diploma of Marketing**

BSBMKG606B Manage international marketing programs

The assessment tools reviewed did not require a student to effectively manage international marketing activities; monitor and evaluate international marketing performance making adjustments as required; or formulate suggestions on how marketing activities could be affected in the future. As a result, the assessment tools did not address all the training



package requirements specifically, the critical aspects, required skills and elements (to the levels as defined in the performance criteria). It was noted it would be very difficult to create a simulated work environment that would allow students to meet the requirements of this unit of competency. This unit of competency is an elective unit within the qualification. It would therefore be possible for the organisation to remove this unit of competency from its training and assessment strategy and replace it with a unit of competency that would be more appropriate for its student cohort that does not have access to an appropriate work environment to undertake assessment.

- **ICA40411 Certificate IV in Information Technology Networking**

ICANWK403A Manage network and data integrity

The assessment tools reviewed did not ensure a student was required to conduct an audit on systems assets or perform network monitoring. As a result, the assessment tools did not address all the training package requirements specifically, the critical aspects, required skills and elements (to the levels as defined in the performance criteria).

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

- **BSB40507 Certificate IV in Business Administration**

BSBINM401A Implement workplace information systems

The organisation is required to provide assessment tools that are appropriate for its delivery mode and student cohort and gather sufficient evidence to address all the training package requirements as outlined in the unit of competency.

- **BSB60507 Advanced Diploma of Marketing**

BSBMKG606B Manage international marketing programs

The organisation is required to provide assessment tools that address all the training package requirements specifically, the critical aspects, required skills and elements (to the levels as defined in the performance criteria). Should the organisation decide to remove this unit of competency from its training and assessment strategy and replace it with another unit of competency the organisation is required to provide assessment tools for the replacement unit that address all the training package requirements as outlined in the unit of competency.

- **ICA40411 Certificate IV in Information Technology Networking**

ICANWK403A Manage network and data integrity

The organisation is required to provide assessment tools that address all the training package requirements specifically, the critical aspects, required skills and elements (to the levels as defined in the performance criteria).

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



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| | 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: 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: 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. | |



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| Original finding: Compliant | Following rectification: n/a |
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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 audited | Following rectification: n/a |
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Reasons for finding of non-compliance:

- The non-compliances identified at audit demonstrate the Chief Executive has not ensured the NVR registered training organisation complies with the VET Quality Framework across all of its operations.

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

- Addressing the non-compliances identified at audit will demonstrate the Chief Executive has ensured the NVR registered training organisation has complied with the VET Quality Framework across all of its operations.

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.

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| Original finding: Compliant | Following rectification: n/a |
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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.

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| Original finding: Not audited | Following rectification: n/a |
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SNR 20 Compliance with legislation

20.1 The NVR registered training organisation must comply with relevant Commonwealth, State

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| 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 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 competence and qualifications to the National VET Regulator on a



regular basis, as determined by the National VET Regulator.
[no requirements currently exist]

This element was not audited

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

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