

Audit report – VET Quality Framework

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

ORGANISATION DETAILS

Organisation's legal name	MEGT (Australia) Ltd
Trading name/s	MEGT Institute Workforce Planning Australia
RTO number	3945
CRICOS number	02517K

AUDIT TEAM

Lead auditor	Kerry Gatliff
Auditor/s	Cheryl Edwards
Technical adviser/s	n/a

AUDIT DETAILS

Application number/s	n/a
Audit number/s	1005771
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	Level 3, 55 Swanston Street, Melbourne, VIC 3000
Date/s of audit	15-16 April 2014 * Note - the audit report previously incorrectly dated the audit as occurring on 26- 27 March 2014
Organisation's contact for audit	Mr Attila Gaspar National Manager, Operations & Governance attila_gaspar@megt.com.au 02 8078 3330
NVR standards audited	Selected Standards for Continuing Registration: SNR15.2 to 15.5, SNR 16.3 to 16.5, SNR 17.3(if relevant), SNR 23 to 25.I

BACKGROUND

This audit is being conducted as part of the Strategic Industry Review into training for early childhood educators, under the authority of S35 (2) of the *National Vocational Education & Training Regulator Act 2011*. ASQA is conducting a number of these audits across Australia, in all States and Territories.



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 the Productivity Commission in its Research Report, *Early Childhood Development Workforce*, November 2011.

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

MEGT (Australia) Ltd is an Industry Association that was initially registered on 1 March 1995. It was last registered on 1 July 2011 and is due for re-registration on 31 March 2014.

MEGT (Australia) Ltd was established in Melbourne in 1982. MEGT Institute, an accredited registered training organisation, is part of MEGT Education which is a division of MEGT. MEGT Education incorporates MEGT Institute and ABILITY English. MEGT operates across every state of Australia and in the United Kingdom. It has 67 offices and employs over 830 staff.

David Windridge is the CEO and Director. There is also a board of Directors comprising 7 members and Barry O’Gorman as Chair and CEO.

The RTO offers a large number of accredited qualifications including Business Services, Children’s Services, Building Services, Hospitality, TAE, and Retail. The RTO’s vocational training services also include short courses. **CHC30712 Certificate III in Children’s Services** and **CHC30113 Certificate III in Early Childhood Education and Care** will be offered in all states and territories except South Australia and Western Australia; and **CHC50113 Diploma of Early Childhood Education and Care** will be offered in NSW, Victoria and the ACT. The commencement date for the 2013 qualifications is 28 April 2014.

CHC30712 Certificate III in Children’s Services and **CHC50908 Diploma of Children’s Services (Early childhood education and care)** will be phased out in June 2014, except for a small number of trainees in the workplace. The RTO will include about 4 hours per week of online delivery for the 2013 qualifications using the Connect System. The key target group for Children’s Services qualifications is overseas students. The RTO also enrolls trainees and school students through the VET in Schools program.

There is a partnership arrangement with St John’s Ambulance to deliver First Aid units.

Funding sources include Skills Victoria User Choice (Victorian State Government), APL User Choice (NSW State Government), ACT Funding Agreement (ACT Government), Strategic Skills Program SSP (NSW State Government).

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

- 2155
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AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
CHC30708	Certificate III in Children's Services	Blended :Face-to-face and on the job, and solely on-the-job	225
CHC30712	Certificate III in Children's Services		
CHC30113	Certificate III in Early Childhood Education and Care	Blended :Face-to-face, on-line and on the job, and solely on-the-job	0
CHC50908	Diploma of Children's Services (Early childhood education and care)	Blended :Face-to-face, and on the job; and solely on-the-job	148
CHC50113	Diploma of Early Childhood Education and Care	Blended :Face-to-face, on-line and on the job, and solely on-the-job	0

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

INTERVIEWEES		
Name	Position	Qualification/Course/Unit code/s
Attila Gaspar	National Manager, Operations and Governance	NA
Warren Obst	MCC Campus Manager	NA
Cassie Hind	Compliance Administration Assistant	NA
Leah West	Academic Manager SCC	All qualifications
Samantha Meeks	Academic Manager MCC	All qualifications
Heather Hunter	WPD and Campus trainer/assessor	All qualifications
Rosyanne Bellenger	Workplace Delivery trainer/assessor	All qualifications
Gloria Gambrellis	Workplace Delivery Manager NSW/ACT	NA
Raymond Lee	National Program Manager	NA

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 22/04/2014: 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.

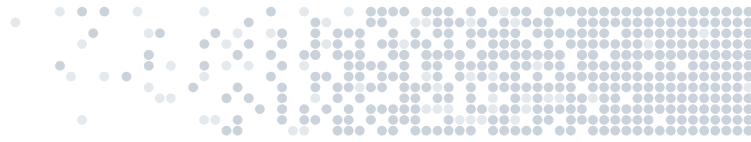


AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on 13/06/2014: Compliant

AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	Compliant
SNR 16	Not compliant	Compliant
SNR 17	Not compliant	Compliant
SNR 18	Not audited	n/a
SNR 19	Not audited	n/a
SNR 20	Not audited	n/a
SNR 21	Not audited	n/a
SNR 22	Not audited	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: 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

Evidence sighted

Strategies for the following qualifications:

CHC30712 Certificate III in Children’s Services

CHC30113 Certificate III in Early Childhood Education and Care

CHC50908 Diploma of Children’s Services (Early Childhood Education and Care)

CHC50113 Diploma of Early Childhood Education and Care

Reasons for finding of non-compliance:

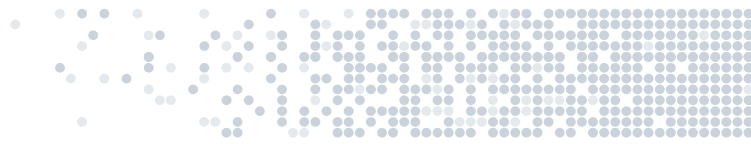
- The description of the target group is not clear, particularly for campus delivery of all qualifications.
- The strategies contained no or insufficient details of duration, nominal hours, hours of training, on and off the job assessment, and a training and assessment schedule for each group. In addition, the strategy does not include the planned 4 hours per week on-line delivery component in its documentation of hours. It is unclear whether the 4 hours is included in the face-to-face component of the course or is additional.
- Elective choices are not clearly explained. A minimum number of electives for each qualification, selected by the RTO, are included, but at audit, the RTO said that it would offer electives as appropriate to a student. The flexibility in selection of electives is not included in the strategies.
- Evidence gathering techniques are not clearly and accurately specified and it is not clear that they are consistent with assessment tools. The instructions to assessors suggest that each assessor has the discretion to select three or more of the methods, even where there are five methods selected. In addition, the method “demonstration in workplace” is not always selected as a method even when it is a Training Package requirement. However, the method “Training Record” is selected. This method includes a range of workplace assessment methods but these are identified only within the actual Training Record tool.

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

- Provide a revised Strategy for each target group for **CHC30113 Certificate III in Early Childhood Education and Care** and **CHC50113 Diploma of Early Childhood Education and Care**. Each Strategy is to provide accurate details of the specific target group; elective information; the duration, hours, workplace visits and training and assessment schedule; the mode of delivery; and evidence gathering techniques consistent with assessment tools.
**Note, the audit report previously incorrectly recorded the qualification code CHC30712 instead of CHC30113.*

Note: Rectification evidence has not been requested for **CHC30712 Certificate III in Children’s Services** and **CHC50908 Diploma of Children’s Services (Early childhood education and care)** because the teach-out phase will be complete in June 2014.

**Note, the audit report previously incorrectly dated the completion as June 2013.*



Analysis of rectification evidence:

CHC30113 Certificate III in Early Childhood Education and Care

CHC50113 Diploma of Early Childhood Education and Care

- The organisation provided:
 - Evidence cover sheet
 - CHC30113 Learning and assessment strategy – Melbourne city campus
 - CHC30113 Course delivery schedule – Melbourne city campus
 - CHC30113 Learning and assessment strategy – Sydney city campus
 - CHC30113 Course delivery schedule – Sydney city campus
 - CHC50113 Learning and assessment strategy – Melbourne city campus
 - CHC50113 Course delivery schedule – Melbourne city campus
 - CHC50113 Learning and assessment strategy – Sydney city campus
 - CHC50113 Course delivery schedule – Sydney city campus
 - CHC30113 Learning and assessment strategy – workplace delivery
 - CHC50113 Learning and assessment strategy – workplace delivery.
- The organisation demonstrated that its strategies for training and assessment meet the requirements of the CHC Training Package by providing accurate details of the specific target groups; elective information; the duration, hours, workplace visits and training and assessment schedule; the mode of delivery; and evidence gathering techniques consistent with assessment tools.

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 RTO has suitable facilities, resources and equipment that are consistent with the requirements of the Training Package. However, the RTO did not demonstrate that all nominated trainer/assessors had current vocational and VET competence, and that assessment materials used are consistent with the requirements of the Training Package, and with its own Strategies.

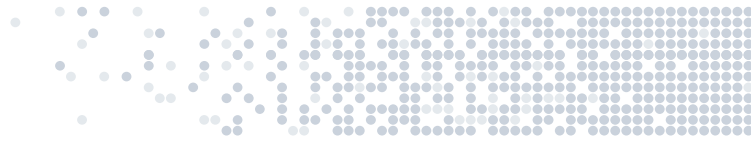
In order to become compliant, the organisation is required to:

- Provide compliant evidence for SNR 15.2, SNR 15.4 and SNR 15.5.

Analysis of rectification evidence:

- The organisation demonstrated compliance in SNR 15.2, 15.4 and 15.5 to demonstrate it has staff and assessment materials consistent with the requirements of the CHC 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: Not compliant

Following rectification: Compliant

Evidence provided

- Vocational mapping document for each trainer/assessor written by the trainer/assessor. There are 24 trainer/assessors.
- Copies of verified qualifications.
- At audit, a Trainer matrix was provided.

Reasons for finding of non-compliance:

- The documentation provided is not sufficient to establish that trainer/assessors demonstrate current industry skills directly relevant to their training/assessment duties and that they continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence. The RTO records were sampled for Nimisha Sheth, Natalie Maries, and Heather Hunter. These records demonstrated that there were no or insufficient details in the staff files to establish trainer/assessor currency. In addition, claims of currency are not verified by the RTO.
- Vocational mapping documents have been completed for all trainer/assessors for all nominated qualifications. These documents have been written by the trainer/assessor themselves, and there is no evidence that the RTO has verified claims.
- There is insufficient detail of qualifications and experience (dates, issuing body, name of employer, etc.) in the Trainer Matrix and vocational mapping document to establish current vocational competency.

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

- Provide evidence that trainer/assessors have current industry skills directly relevant to the training/assessment being undertaken; and continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.
- Provide evidence of an RTO process for the verification and documentation of all trainer/assessors claims to current vocational and VET competence, and an action plan demonstrating how this process will be completed before July 2014.
- The RTO is to provide ASQA with a revised staff matrix that demonstrates that trainer/assessors fully comply with SNR 15.4 and indicates that the RTO has verified trainer/assessor claims by July 2014.

Analysis of rectification evidence:

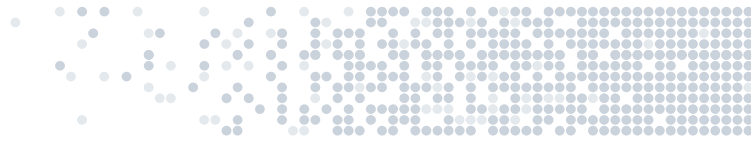
CHC30712 Certificate III in Children's Services

CHC30113 Certificate III in Early Childhood Education and Care

CHC50908 Diploma of Children's Services (Early Childhood Education and Care)

CHC50113 Diploma of Early Childhood Education and Care

- The organisation provided:
 - Evidence cover sheet
 - Verification action plan summary
 - Verification of industry currency for:
 - Josephine Lam
 - Penny Muller
 - Katherine Stevens
 - Kate Laferita
 - Judy Bogatin
 - Wendy Fitzpatrick
 - Trainer/assessor professional development and industry currency policy and procedure



- Professional development and industry currency activity form
- Trainers professional development and industry currency intranet work instructions
- Managers professional development and industry currency intranet work instructions
- Workplace delivery trainer observation
- Revised staff matrix
- Children's services trainer matrix.
- The evidence demonstrated:
 - the sampled trainers and assessors have current industry skills directly relevant to the training/assessment being undertaken (SNR 15.4c); and continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence (SNR 15.4d)
 - the organisation has a process for the verification and documentation of all trainer/assessors claims to current vocational and VET competence, and an action plan demonstrating how this process will be completed before July 2014
 - the organisation has a revised staff matrix that demonstrates that trainer/assessors fully comply with SNR 15.4 and indicates that the RTO has verified trainer/assessor claims by July 2014.

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

Evidence sighted

Assessment tools for the following qualifications:

CHC30712 Certificate III in Children's Services

CHC30113 Certificate III in Early Childhood Education and Care

CHC50908 Diploma of Children's Services (Early Childhood Education and Care)

CHC50113 Diploma of Early Childhood Education and Care

Reasons for finding of non-compliance:

The RTO has not demonstrated that assessment meets the requirements of the relevant Training Package, is conducted in accordance with the principles of assessment and the rules of evidence, and is systematically validated, because:

- Students are not given instructions explaining workplace assessment tasks with criteria to guide performance. Students are only given verbal instructions, and the assessor observation template (that also does not describe behavioural tasks) to guide them. This means that workplace assessment is not valid or fair.
- The Training Record template used by the assessor to assess students in the workplace does not collect all the assessment evidence required by the Training Package, does not describe assessment tasks in behavioural language with criteria to guide performance, and are not designed to facilitate effective feedback. The template does not gather required Training Package evidence such as a range of age groups, and a range of conditions over a number of assessment situations. The assessor is only required to tick the box to indicate one observation has taken place, so there is no requirement for effective feedback. The Assessor observes the student performing everyday activities in the centre, and if some tasks are not observed then the assessor asks the supervisor to observe. This may mean that workplace assessment is not sufficient, valid or fair.
- Third Party reports by the workplace supervisor are incorporated in the Training Record



tool. The supervisor feedback box only requires a “tick to indicate an observation”. Supervisors are not required to provide effective feedback to students. Third Party Reports are therefore an invalid form of assessment.

- The Training Record also records with a tick that other required workplace assessment documentation has been received, and whether strategic questioning has taken place. Sufficient evidence of strategic questioning is not documented.
- Foundation Skill requirements specified in the 2013 qualifications are not assessed.
- Training Package knowledge requirements are not consistently met across qualifications. For example for CHCCN511B Establish and maintain a safe and healthy environment for children, knowledge requirements are not met and are not at the depth required for AQF 5, including developmental stage appropriate toys and equipment and organisation standards, policies and procedures. Another example is for CHCECE007 Develop positive and respectful relationships with children as students are not required to navigate and find information relevant to the NQS. The mapping tools are not always accurate.
- Assessment activities for CHC50908 Diploma of Children’s Services (Early childhood education and care) and CHC50113 Diploma of Early Childhood Education and Care are not appropriate for AQF 5. Completed student work sampled indicated that students did not have the language ability to perform at Diploma level. Tasks were too simple, not all tasks had been completed, and other tasks did not demonstrate sufficient evidence of required skill and knowledge. Nevertheless, the summary record of competency for the unit showed the student competent in the unit.
- The RTO had conducted only one RPL assessment over the last year. Evidence of this assessment indicates that RPL assessment tools did not ensure the validity and reliability of assessment. There was no tool to collect evidence, and there was no advice to the assessor as to how to establish sufficient and valid evidence and how to synthesise evidence in order to make a decision of competence.
- The RTO does not follow the ASQA general direction for the retention of completed student assessment items. The RTO requires the student to keep their Training Record Booklet for all units until the end of the course. Students are responsible for ensuring that assessment records are entered by the assessor and supervisor. The assessor does not keep a copy of completed Training Records, and a copy of the Training Record for completed units is not placed in the student’s assessment file until assessment for all units are completed. This practice places an unacceptable responsibility on the student, and puts the RTO’s assessment process at risk: assessment it is unreliable and unfair, and authenticity is compromised.
- The Trainee workplace program uses Aspire assessment tools that have not been contextualised or validated. There is no workplace observation tool for workplace assessment.
- Validation of assessment tools is not systematic because the RTO’s validation process did not identify that workplace assessment tools do not meet the requirements of the relevant Training Package, or provide sufficient guidance to assessors to conduct workplace assessment in accordance with the principles of assessment and rules of evidence.

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

- Provide revised and validated assessment tools, including RPL tools, that meet Training Package requirements, principles of assessment and rules of evidence for the following units:

CHC30113 Certificate III in Early Childhood Education and Care

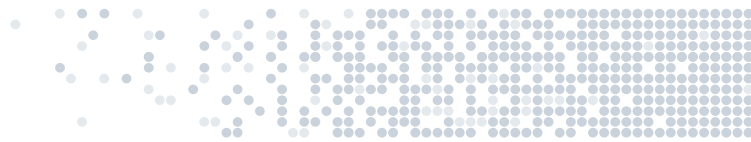
- CHCECE003 Provide care for children
- CHCECE007 Develop positive and respectful relationships with children
- CHCECE005 Provide care for babies and toddlers

CHC50113 Diploma of Early Childhood Education and Care

- CHCECE002 Ensure the health and safety of children
- CHCECE026 Work in partnership with families to provide appropriate education and care for children

~~The revised tools for the Diploma are to be at AQF 5.~~

**Note, the above statement was removed by the Regional Manager Compliance, Melbourne.*



Note: Rectification evidence has not been requested for **CHC30712 Certificate III in Children's Services** and **CHC50908 Diploma of Children's Services (Early childhood education and care)** because the teach out phase will be complete in June 2013.

- Provide evidence of a revised assessment process which is consistent with ASQA's general direction for the retention of completed assessment items. The RTO is to also provide evidence of how it intends to manage assessment records in the workplace, in particular the Training Records, to ensure consistency with the principles of assessment.
- Provide evidence of a revised student placement process that will identify students whose true language ability has not been captured by their IELTS rating (or other rating system), and a process for the early identification of students who have been placed by mistake in a qualification that is beyond their language ability.

Analysis of rectification evidence:

CHC30113 Certificate III in Early Childhood Education and Care

CHCECE003 Provide care for children

CHCECE007 Develop positive and respectful relationships with children

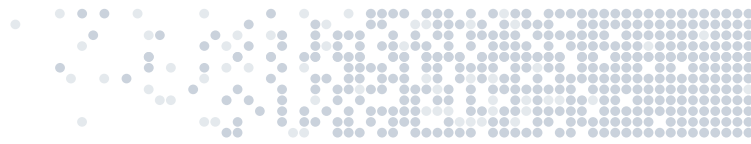
CHCECE005 Provide care for babies and toddlers

CHC50113 Diploma of Early Childhood Education and Care

CHCECE002 Ensure the health and safety of children

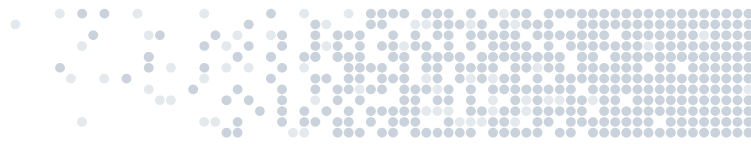
CHCECE026 Work in partnership with families to provide appropriate education and care for children

- The organisation provided:
 - Advice the organisation will utilise the Australian Government Department of Education Recognition of Prior Learning for early childhood educators tool kit
 - Clarification email to the Curriculum Maintenance Manager, and response
 - Email from Jan Mulcahy
 - Student assessment information guide – CHC30113 and CHC50113
 - *CHCECE002 Ensure the health and safety of children:*
 - Industry feedback
 - Assessment tool – direct observation in the workplace
 - Assessment tool – work samples; short answer questions using experience from the workplace. Marking guide included
 - Assessment tool – written report; short answer questions and case studies. Marking guide included
 - Cover sheet identifying relationship to *HLTAID004*
 - Mapping matrix between *CHCECE002* and *HLTAID004*
 - Mapping matrix
 - *CHCECE003 Provide care for children:*
 - Assessment tool – direct observation in the workplace
 - Assessment tool – written report. Marking guide included
 - Assessment tool – work sample. Marking guide included
 - Workplace supervisor information (clustered with *CHCECE003*, *CHCECE005*, *CHCECE007* and *CHCECE010*)
 - Mapping matrix
 - *CHCECE005 Provide care for babies and toddlers:*
 - Assessment tool – direct observation in the workplace
 - Assessment tool – written report. Marking guide included
 - Assessment tool – work sample. Marking guide included
 - Workplace supervisor information (clustered with *CHCECE003*, *CHCECE005*, *CHCECE007* and *CHCECE010*)
 - Mapping matrix
 - *CHCECE007 Develop positive and respectful relationships with children:*
 - Assessment tool – direct observation in the workplace
 - Assessment tool – written report. Marking guide included



- Assessment tool – work sample. Marking guide included
- Workplace supervisor information (clustered with CHCECE003, CHCECE005, CHCECE007 and CHCECE010)
- Mapping matrix
- *CHCECE026 Work in partnership with families to provide appropriate education and care for children*
 - Assessment tool – direct observation in the workplace
 - Assessment tool – written report. Marking guide included
 - Assessment tool – work sample. Marking guide included
 - Mapping matrix
- Archiving retention and retrieval guidelines for student record policy and procedure
- Monitoring course progress policy and procedure
- English language proficiency requirements for international students entering vocational courses policy and procedure
- English for special purposes entry test
- English for special purposes answer sheet
- English for special purposes answer sheet marking guide.
- For each unit of competency, assessment tools meet the requirements of the Training Package and demonstrate that assessment will be conducted in accordance with the principles of assessment and rules of evidence.
- The organisation provided a revised assessment process which is consistent with ASQA's general direction for the retention of completed assessment items. The organisation also demonstrated how it intends to manage assessment records to ensure consistency with the principles of assessment.
- The organisation demonstrated how it will identify students whose true language ability has not been captured by their IELTS rating (or other rating system), and provided a process for the early identification of students who have been placed by mistake in a qualification that is beyond their language ability.

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: 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 compliant	Following rectification: Compliant



Reasons for finding of non-compliance:

- The RTO has not provided sufficient evidence that it engages employers in the delivery of the training and assessment. The RTO does not provide employers with sufficient information for them to support the learning and assessment program for each student. For example, there is no written advice given to employers about assessment visits and what will be assessed, and how the employer can support the student prepare for assessment.

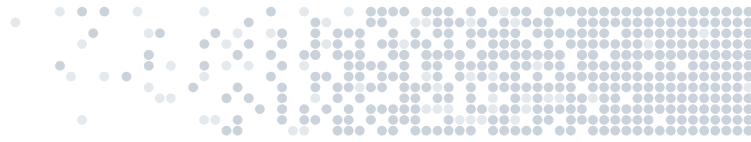
In order to become compliant, the organisation is required to:

- The RTO is to demonstrate that it engages employers in the delivery of the training and assessment by providing evidence of sufficient information for them to support the learning and assessment program of students.

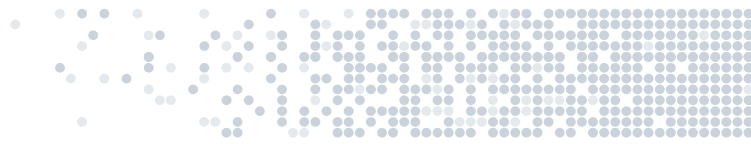
Analysis of rectification evidence:

- The organisation provided:
 - Evidence cover sheet
 - Industry feedback on the implementation and workability of the direct observation assessment tool from five host child care centres
 - Work placement welcome letter
 - Practicum assessment schedule matrix
 - Practicum orientation PowerPoint
 - Work placement guidelines
 - Assessment timetable summary
 - Direct observation assessment tool sample.
- The evidence demonstrated that the organisation engages employers, who contribute to a learner's training and assessment, in the delivery of training and assessment.

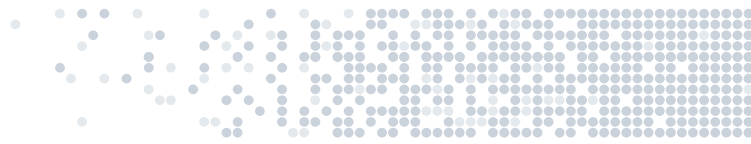
16.5	Learners receive training, assessment and support services that meet their individual needs.	Original finding: Compliant	Following rectification: n/a
16.6	Learners have timely access to current and accurate records of their participation and progress.	Original finding: Not audited	Following rectification: 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: Not compliant	Following rectification: Compliant
<i>Evidence sighted:</i>			
<ul style="list-style-type: none">• MOU's between MEGT (Australia) Ltd and St John Ambulance Australia to deliver first aid units<ul style="list-style-type: none">• Melbourne Campus<ul style="list-style-type: none">○ 2012-2013 – the MOU has not been updated to confirm delivery of the new unit of competency <i>HLTFA311A Apply first aid</i> required for completion of CHC30712 Certificate III in Children's Services○ 2014-2015• Sydney Campus<ul style="list-style-type: none">○ 2012-2013○ 2014-2015			
<i>Reasons for finding of non-compliance:</i>			
<ul style="list-style-type: none">• The 2012-2013 Melbourne Campus MOU between MEGT (Australia) Ltd and St John Ambulance Australia detailing the delivery of the first aid unit to students enrolled at MEGT has not been updated to confirm delivery of the new unit of competency <i>HLTFA311A Apply first aid</i> required for completion of CHC30712 Certificate III in Children's Services.			
<i>In order to become compliant, the organisation is required to:</i>			
<ul style="list-style-type: none">• If there are students enrolled in CHC30712 Certificate III in Children's Services who have not completed the first aid unit, provide an amended MOU that confirms St John Ambulance Australia will deliver the current unit of competency <i>HLTFA311A Apply first aid</i> required for completion of CHC30712 Certificate III in Children's Services.• If there are no further students needing to complete the first aid unit for CHC30712 Certificate III in Children's Services refer to SNR 23.1 for rectification evidence required.			
<i>Analysis of rectification evidence:</i>			
<ul style="list-style-type: none">• The organisation provided:<ul style="list-style-type: none">○ Evidence cover sheet○ Memorandum of understanding, signed 17/05/2012○ St John Ambulance Australia first aid training letter.• The evidence demonstrates the organisation monitors training and assessment provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework; including the delivery of all correct units of competency for CHC30712 Certificate III in Children's Services.			
17.4	The NVR registered training organisation manages records to ensure their accuracy and integrity.	Original finding: Not audited	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.

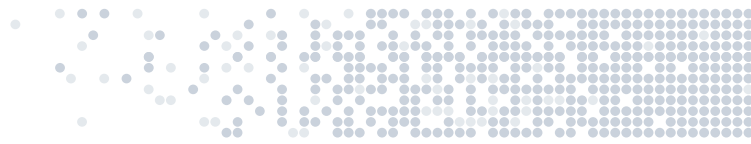
Original finding: Not audited

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

Evidence sighted:

- Statement of Attainment issued -
 - Alanna Leigh Ferreira - part completion of **CHC30712 Certificate III in Children's Services**
 - The following 4 unit of competency were completed -
 - CHCCN302A – Provide care for children
 - CHCIC301E – Interact effectively with children
 - CHCORG303C – Participate effectively in the work environment
 - HLTF311A – Apply first aid
- Qualifications issued – **CHC30712 Certificate III in Children's Services**
 - Shandelle Kate Horsburgh – the superseded first aid unit *HLTFA301C Apply first aid* is listed on the Statement of Results
 - Olivera Hristova – correct first aid unit listed
 - Lenka Jovcheska – correct first aid unit listed

Reasons for finding of non-compliance:

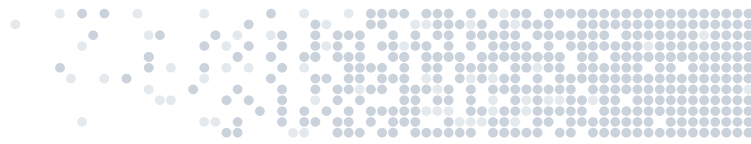
- MEGT (Australia) Ltd has issued a qualification for **CHC30712 Certificate III in Children's Services** with a superseded unit of competency listed on the Statement of Results. This qualification requires the completion of *HLTFA311A Apply first aid* however the Statement of Results lists *HLTFA301C Apply first aid* which is the superseded unit of competency.
- The RTO has an MOU with St John Australia that lists the superseded first aid unit as the agreed unit of competency to be delivered. Refer to SNR 17.3 for further information.

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

- Provide a list of all students who have been issued with a qualification for **CHC30712 Certificate III in Children's Services** with the superseded unit of competency *HLTFA301C Apply first aid* listed on the Statement of Results.
- Provide a strategy showing how the non-compliance relating to the issuance of qualifications with superseded units of competency listed on the Statement of Results will be addressed.

Analysis of rectification evidence:

- The organisation provided:
 - Evidence cover sheet
 - List of 13 students issued with a qualification for **CHC30712 Certificate III in Children's Services** with the superseded unit of competency *HLTFA301A Apply first aid*.
 - Business System Key User policies and procedures
 - Business System Key User position description.
- The organisation provided an explanation identifying why students were awarded a qualification with an incorrect unit of competency to qualification requirements.
- The organisation demonstrated how it will manage the process to ensure the issuance of all qualifications will meet the Australian Qualifications Framework 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: 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

Following rectification: n/a