

## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	<b>BSI Learning Institute</b>
Trading name/s	BSI Learning
RTO number	21371
CRICOS number	N/A

#### AUDIT TEAM

Lead auditor	Robyn Trigg
Auditor/s	Ruth Walker
Technical adviser/s	N/A

#### AUDIT DETAILS

Application number/s	1046853	
Audit number/s	1004499	
Audit reason 1	Application - renewal	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	Level 3 Holt Street Surry Hills NSW 2010	
Date/s of audit	22 & 23 January 2014	
Organisation's contact for audit	Mr Kevin Joshua kjoseph@bsilearning.com.au	CEO 0452 273 281
NVR standards audited	Selected Standards for Continuing Registration: SNR 15, 16, 17, 18, 20, 22.2	

#### BACKGROUND

- BSI Learning Institute trading as BSI Learning was formerly known as Hume Learning Institute Proprietary Limited which had originally been registered in Victoria in 2003 and re-registered there in 2008. The RTO's name changed to BSI Learning Institute in May 2013. Hume Learning Institute had owned Southern Edge Training RTO until 2010. BSI Learning Institute also delivers non-accredited training in programs such as business leadership
- In the correspondence undertaken in preparation for the audit it was established in discussions with the CEO, Mr Kevin Joseph, that the RTO had been through a major restructure with regard to its Board and staffing. According to Mr Russell Joshua, Quality Risk and Business Systems Manager of the RTO since



July 2013, the operations of the RTO had been in crisis. In February 2013, the Chief Executive Officer/Managing Director, Mr Graham Raspass and the General Manager Operations (GMO)/Compliance Manager Ms Gina Sulfaro, had their employment terminated. Legal actions are currently being taken against Mr Raspass. Russell Joshua's brief has been to manage the crisis and draw all the RTO's business records together from the various regional locations where they had been held.

- Mr Kevin Joseph took up the position of CEO in July 2013 with the brief of developing and implementing a 12 month turnaround project. Kevin came from a background of corporate marketing of industry on an international circuit and is experienced in change management, banking and Australian Prudential Regulatory Authority. The project has had three key aims. The first; to reverse the loss the organisation had been experiencing under Mr Raspass's management, the second; to take corrective actions to ensure the RTO's compliance and the third, to find and initiate new ways of creating future growth. Monthly Board Meetings have been held and a new organisational plan, business plan and financial projection have been introduced. In addition to this the shareholders have invested a large sum of money since March 2013 to pull the organisation back from the brink of closure. The company had experienced a loss of \$700,000 in the financial year to June 2013 and June was the first month in 12 months that the RTO turned a profit.
- The RTO closed both its Melbourne and its Brisbane Office and it is planning to relocate from Holt St Surry Hills to its corporate headquarters in Martin Place in the not too distant future. All these actions are part of the 12 month turnaround plan
- The current eight Board members have only been in place since February 2013. There are 12 independent shareholders but none of these have controlling interest in the RTO operations. In addition to this the RTO management team is independent from the Board. BSI Learning Institute is owned by a larger corporate group, BSI Learning Limited of whom the officeholders/directors are Michael Lynch, Ivan Kaye, Wilfred Bagg and Kevin Joseph. The other three directors are non-executives directors. All these parties have signed the Fit and Proper Person requirement declaration. David Liberman of the Jagen Group, a member of BSI Learning Pty Ltd also signed a Fit and Proper Person requirement declaration. Ivan Kaye had been Chairman of BSI Learning Institute but resigned his position to avoid the risk of being too restrictive upon the RTO's operations. Other companies that exist within the BSI group include BSI Innovation, BSI Institute Pty Ltd, BSI Learning Pty Ltd, BSI People (a recruitment agency) and BSI Wealth.
- All contract trainer assessors are industry experts and all delivery is done on site in the workplace using workplace equipment, workplace support staff and workplace checking and monitoring. The RTO's corporate clients maximise their government funding options. Two thirds of the RTO's business is the VET in Prisons Program it delivers for the Queensland Government – Corrective Services/Prisons/Health agreements and endorsements. The other third are corporate clients such as Home Art, Ku-Ring-Gai Council, Macquarie Telecom, Yum Group (KFC and Pizza Hut) and Aboriginal Land Councils (in Sydney and Melbourne). Kennard had been a major client but the failures of the RTO under previous management meant that Kennard discontinued its arrangements with the RTO. In fact, the new management group have had to implement significant measures to retain some of the current clients. The only fee for service delivery is Diploma of Management.
- Another measure taken by the current management group in July 2013 was to further reduce the RTO's scope. At audit, Kevin Joseph advised that the RTO would also request for CPC10111 Certificate I in Construction to be removed from scope because the RTO was not delivering programs relating to this qualification apart from the unit of competency CPCCOHS1001A Work safely in the construction industry which exists on the RTO's scope as a unit of competency.
- There is a plan in place to undertake off-shore delivery in India later in 2014 and an RTO representative is planning to go to Hyderabad in India to meet with an agent there to investigate the potential and the approach to be taken in piloting a Diploma of Management program there by October in 2014.
- Some of the other actions the RTO has recently taken include two full redevelopments of the RTO



website, ongoing staff training and trainer/assessor professional development, embedding of Board processes, introduction of “Food for Thought” events, forums of corporate client representatives (as many as 35) and BSI staff (10 representatives mainly from Human Resources and Learning and Development sections). These are held over catered lunches and each event focuses on various topics of interest ranging across topics such as marketing, diversity in the workplace and interesting innovations.

- Total number of current enrolments in RTO as at audit date: 479

<b>AUDIT SAMPLE</b>			
<b>Code</b>	<b>Qualification/Course/Unit name</b>	<b>Mode/s of delivery/assessment*</b>	<b>Current enrolments (If not yet on scope, record N/A)</b>
39280QLD	Course in Core Skills for Employment – Communication (Basic)	F2F	18
39288QLD	Certificate I in Core Skills for Employment – Numeracy	F2F	14
BSB51107	Diploma of Management	F2F	14
CPC10111	Certificate I in Construction	F2F	14
CPP31011	Certificate III in Cleaning Operations	F2F	23
MSA30107	Certificate III in Process Manufacturing	F2F	9
SIR40207	Certificate IV in Retail	F2F	38
SIT20212	Certificate II in Hospitality	F2F	36
SIT20312	Certificate II in Kitchen Operations	F2F	3

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

<b>INTERVIEWEES</b>		
<b>Name</b>	<b>Position</b>	<b>Qualification/Course/Unit code/s</b>
<b>Kevin Joseph</b>	CEO	
<b>Kala Phillip</b>	National Training and assessment Service Delivery Manager	
<b>Russell Joshua</b>	Quality Risk and Business Systems Manager	
<b>Jason Toomey</b>	Queensland Customer Solutions Officer	
<b>Jack Stack</b>	Systems Coordinator	
<b>Scott Wesley</b>	Training and Assessment Strategy Adviser	
<b>Carol Lewis</b>	Human Resources Advisor	
<b>Steve Fearn</b>	Trainer and Assessor	BSB51107 Diploma of Management
<b>Phil Darling</b>	Trainer and Assessor	MSA30107 Certificate III in Process Manufacturing
<b>Dennis McHugh</b>	Trainer and Assessor	CPCCOHS1001A – Work safely in the construction industry



<b>Krystin Bashford</b>	Trainer and Assessor	CPP31001 Certificate III in Cleaning Operations
<b>Tania Dwyer</b>	Trainer and Assessor	SIT20112 and SIT20312 Certificates II and III in Hospitality

**ORIGINAL AUDIT FINDING AT TIME OF AUDIT**

**Audit finding as at 21/02/2014: 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 23/04/2014: Compliant**

**AUDIT FINDING BY STANDARD**

<b>Standard</b>	<b>Original finding</b>	<b>Finding following rectification</b>
SNR 15	Not compliant	Compliant
SNR 16	Not compliant	Compliant
SNR 17	Not audited	n/a
SNR 18	Not compliant	Compliant
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 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:*

- The RTO did not provide evidence that they have the staff, facilities, equipment and training and assessment materials to provide the Certificate I in Construction. Discussion at audit confirmed that the intention was to only offer CPCCOHS101A and withdraw the Certificate I in Construction from their scope of registration. The RTO currently has CPCCOHS101A on scope as a stand-alone unit.

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

- Either withdraw Certificate I in Construction from scope or provide evidence that the RTO has the staff, facilities, equipment and training and assessment materials required to provide this qualification

*Analysis of rectification evidence:*

- TGA at training.gov.au demonstrates that CPC10111 Certificate I in Construction has been removed from the RTO scope as of 8 April 2014.
- Copy of notification to ASQA also provided.
- Updated Training and Assessment strategy specific to CPCCOHS1001A Work safely in the construction industry (V1 30713) also provided.

**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.**

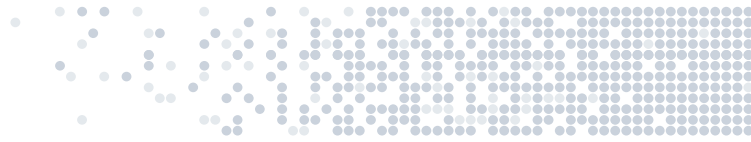
**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- No evidence of development of VET knowledge and skills was provided for Kara Davies

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



- Provide evidence of development of VET knowledge and skills for Kara Davies

*Analysis of rectification evidence:*

- Evidence to demonstrate development of VET knowledge and skills provided for Kara Davies including:
  - Statutory Declaration signed by Kara Davies stating that all information provided in relation to her is true and correct (signed 19/11/13)
  - A trainer skills matrix
  - A record of Continuing Professional Development 2013 including currency of practice through Dicky Beach Surf Club as a Duty Manager for 5 hours per month with responsibility for RSA/RSG/RMLV etc
  - A Professional Development Log 2012-2013
  - Resume
  - TAE40110 Certificate IV in Training and Assessment testamur from TAFE Queensland (5/6/12)
  - Responsible Service of Gambling Course Certificate (RSG) – Office of Liquor and Gaming - Queensland Government – 22/12/10
  - SITHFAB009A Responsible Service of Alcohol (RSA) - Office of Liquor and Gaming - Queensland Government 31/7/2013
  - SIT50307 Diploma of Hospitality (including SITHGAM006A Provide responsible gambling services and up to 40 other units) – Australian Hospitality Skills Recognition – RTO 32217 – 19/11/2011
  - Responsible Management of Licenced Venues (RMLV) (Licensee’s Course Certificate) - Office of Liquor and Gaming - Queensland Government – 14/1/12

**Evidence provided has demonstrated compliance**

<p><b>15.5 Assessment including Recognition of Prior Learning (RPL):</b>  <b>(a) meets the requirements of the relevant Training Package or VET accredited course; and</b>  <b>(b) is conducted in accordance with the principles of assessment and the rules of evidence; and</b>  <b>(c) meets workplace and, where relevant, regulatory requirements; and</b>  <b>(d) is systematically validated.</b></p>	<p><b>Original finding:</b> Not compliant</p>	<p><b>Following rectification:</b> Compliant</p>
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*Reasons for finding of non-compliance:*

- The RTO is in the process of purchasing and contextualising assessment tools for the Certificate IV in Retail Management. Consequently they did not have materials available for the two units sampled: SIRXMGT003A Lead and manage people and SIRXMER304 Present products

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

- Provide assessment tools for SIRXMGT003A and SIRXMER304 that:
  - meet the requirements of the Training Package
  - have instructions and content sufficient to ensure that assessment will be conducted in accordance with the principles of assessment and rules of evidence
  - meet workplace and where relevant regulatory requirements and
  - have been systematically validated

*Analysis of rectification evidence:*

- Rectification of SNR15.5 Non-Compliance Briefing Paper listing rectification actions and tasks undertaken as listed in following dot points– signed by Kevin Joseph - CEO and dated 28/3/14 – co-signed by Russell Joshua – Quality, Risk & Business Quality, Risk & Business Systems – 28/3/14
- Notification and explanation for revised units for SIR40212 Certificate IV in Retail Management



– a letter addressed to Principal Compliance Auditor – Robyn Trigg, advising that two elective units, SIRXMPR001A Provide a retail market and SIRXMER303 Present products, are being replaced by BSBWOR402A Promote team effectiveness and BSBCUS501C Manage quality customer service. Signed and dated by Russell Joshua on 28/3/2014.

- Revised Training and Assessment Strategy (TAS) for SIR40212 (V2.0 19/3/14) showing removal of SIRXMER303 Present products and addition of BSBWOR402A Promote team effectiveness and BSBCUS501C Manage quality customer service. This is supported by consultation undertaken with a major client Homeart National in Bella Vista on 1/4/14
- Evidence of Industry Validation of Revised TAS for SIR40212 – demonstrates the TAS review process mark-ups and notes for additions and removals of content including assessment plan, facility venues and industry engagement details. Validation Kit with signatories (1/4/14) to the activity – Robert Repaci of HomeArt and Derek Le-Grand (self-employed trainer/assessor identified for delivery of this qualification). Resumes of proposed trainer/assessors Victoria Howard, Derek Le-Grand and Robert Repaci attached.
- Assessment Tools for SIRXMGT003A Lead and manage people including Learner Workbook, Observation Checklist (each V2014 V1.0 BSI copyright.)
- TAS Instructions & Support Materials for SIRXMGT003A including Session Plans, Instructor Workbook & Answer Guide (with estimated times for completion of tasks). Assessment Matrix maps elements and performance criteria to learner workbook tasks, observation activities and major activities such as A Delegation Journal over a 2 week period with planning, monitoring, evaluating and when concluded, discussing of findings. Other support documents are Assessment Criteria, Instructor Workbook & Answer Guide, Learner Guide and Induction Handbook.

The rectification evidence provided for this standard demonstrates a comprehensive suite of resources for ensuring compliance in relation to the identified qualification and unit.

<b>SNR 16</b>	<b>The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:</b>	
<b>16.1</b>	<b>The NVR registered training organisation establishes the needs of clients, and delivers services to meet these needs.</b>	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>16.2</b>	<b>The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.</b>	
	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>16.3</b>	<b>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.</b>	
	<b>Original finding:</b> Not compliant	<b>Following rectification:</b> Compliant
	<i>Reasons for finding of non-compliance:</i>	
	<ul style="list-style-type: none"> <li>• Information about prices, payment plans and refunds is not provided to all clients before they enrol or enter into an agreement. While the RTO has enterprise clients with whom it negotiates contractual arrangements for training enterprise employees, it has the same responsibilities with regard to individual clients that are not currently being met.</li> </ul>	
	<i>In order to become compliant, the organisation is required to:</i>	
	<ul style="list-style-type: none"> <li>• Provide evidence of how it ensures that all clients are provided with information about prices, payment plans and refunds before the client enrolls or enters into an agreement.</li> </ul>	

*Analysis of rectification evidence:*



- BSB51107 Diploma of Management Course Brochure – refers to fee structure as to be determined in consultation with your employer. Downloadable from the RTO website.
- Participant Handbook with information about financial considerations such as service provision fees and information, refund terms and conditions and tuition fee safeguard and assurance accompanied by a declaration of understanding for student completion at end of handbook. Although the fees are not stated, this handbook gives a guarantee that multiple relevant fee items such as total fees, tuition fees, administration fees, materials fees, and any other such charges will be available to all potential and existing clients in a simple, easy to read and understand format. Downloadable from the RTO website
- Schedule of fees – shows course codes, course titles and fees per course (not on RTO letterhead), but downloadable from RTO website under link named Schedule of Qualification Fees – Course Price Lists
- Complaints and Appeals Policy and Procedure
- Refund Policy and Procedure
- Website Screen Shot of all of the above listed items
- Enrolment Form
- Service Provider Agreement (BSIL Confidential) between BSI Learning P/L and Schneider Electric Australia P/L contains background, definitions and interpretation, term, general obligations and duties, confidentiality and privacy, clause re liability, indemnity and insurance, suspension and termination, clauses to survive termination, severance, entire agreement, counterparts and governing law.

Rectification evidence provision as a suite of documents demonstrates compliance.

<b>16.4</b>	<b>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.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>16.5</b>	<b>Learners receive training, assessment and support services that meet their individual needs.</b>	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>16.6</b>	<b>Learners have timely access to current and accurate records of their participation and progress.</b>	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>16.7</b>	<b>The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</b>	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>SNR 17</b>	<b>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:</b>		
<b>17.1</b>	<b>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.</b>	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>17.2</b>	<b>The NVR registered training organisation uses a systematic and continuous improvement</b>		





**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:** Compliant

**Following rectification:** n/a

**SNR 18 The NVR registered training organisation has governance arrangements in place as follows:**

**18.1 The NVR registered training organisation's Chief Executive must ensure that the NVR registered training organisation complies with the VET Quality Framework. This applies to all of the operations within the NVR registered training organisation's scope of registration, as listed on the National Register.**

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The RTO's Chief Executive has not ensured that the organisation is compliant with all the standards reviewed at audit. Specifically, the RTO is non-compliant with SNR 15.3, 15.4, 15.5, and 16.3.

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

- Provide evidence to rectify the non-compliances, as detailed within this report.

*Analysis of rectification evidence:*

- Rectification evidence as provided to address non-compliances identified at SNR 15.3, 15.4, 15.5 and 16.3 has demonstrated compliance.

**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:** 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 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