

AQTF Audit Report - Continuing Conditions of Registration

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STEPS Disability QLD Inc T/A STEPS Training - NTIS # 1847

 TRIM: 10/185641
 Version 3 – 2 November 2010
 Training and International Quality

RTO details			
Legal name	STEPS DISABILITY QLD INC	Registration expiry	28/07/2011
RTO contact	Ms Fay Mercieca	Phone	(07) 5458 3000
Audit team			
Lead auditor	Lorraine D'Silva		
Phone	(07) 3234 1814	E-mail	Lorraine.D'SILVA@deta.qld.gov.au
Audit details			
Audit number	1847-15A	Conditions audited	1 - 9
Other audit notes	<ul style="list-style-type: none"> Risk advice recommends that the application undergo a desk audit and a decision be made on the site audit based on the outcome of the desk audit. The organisation provided immediate clarification of evidence and therefore, no non-compliance was identified. 		
Audit date	18/7/2011	Audit outcome on day of audit	<input checked="" type="checkbox"/> Compliant <input type="checkbox"/> Minor non-compliance <input type="checkbox"/> Significant non-compliance <input type="checkbox"/> Critical non-compliance
Audit advice			
Recommendation	<input checked="" type="checkbox"/> Approve application <input type="checkbox"/> Refer to site visit <input type="checkbox"/> Refer to RME		
Strengths	The organisation's evidence was clearly outlined and included a wide range of supporting documents to ensure sufficiency of evidence in its application for renewal of registration.		

Condition 1 - Governance

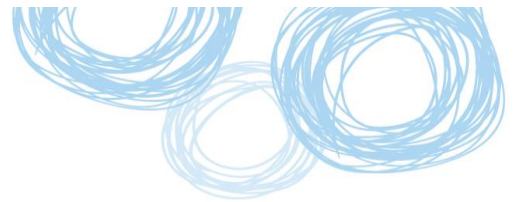
 At time of audit: **Compliant** **Not Compliant**

Description of evidence sighted:

- The RTO provided evidence of its mechanisms to ensure compliance with AQTF Essential Conditions and Standards for Continuing Registration including the following:
 - Professional development of staff for currency with industry trends and legislation relevant to operations.
 - Formation of the 'National Training Services Team' that is responsible for establishing compliance requirements, including conducting audits.
 - Quarterly 'Quality Management Committee' meetings where senior management meet to discuss key performance and compliance requirements. The feedback from trainers/assessors is incorporated into the discussion and decisions are informed by the experiences and suggestions of trainers/assessors.
 - Internal reporting based on the RTO's policy for 'Internal Communication Protocol' and a flowchart outlining the reporting process within the organisation.
 - Template of its 'Trainer/assessor experience form' used to obtain feedback from trainers.
- 2009-2010 Annual Report for STEPS
- RTO 4 forms including certified fit and proper declarations for Christine Evelyn Jones (Director), Gary Hooper (CEO), Michael Luije (Director), Helen Elizabeth Ferguson (Director)

Evidence checklist:

- | Evidence provided confirms: | Y | N |
|---|--------------------------|-------------------------------------|
| <ul style="list-style-type: none"> The RTO's Chief Executive must ensure that the RTO complies with the AQTF <i>Essential Conditions and Standards for Continuing Registration</i> and any national guidelines approved by the National Quality Council or | <input type="checkbox"/> | <input checked="" type="checkbox"/> |



its successors. This applies to all of the operations within the RTO's scope of registration, as listed on the National Training Information Service.

- The RTO's senior officers and directors or substantial shareholders who are in a position to influence the management of the organisation must satisfy fit and proper person requirements unless these requirements have already been met through other legislative provisions.
 [These are the people identified in section 2.1 of the RTO 1(b) form. Each of these people has completed and declared the RTO 4 form - Fit and proper person requirements declaration.]
- The RTO must also explicitly demonstrate how it ensures the decision making of senior management is informed by the experiences of its trainers and assessors.

Condition 2 – Interactions with the Registering Body

At time of audit: Compliant Not Compliant

Description of evidence sighted:

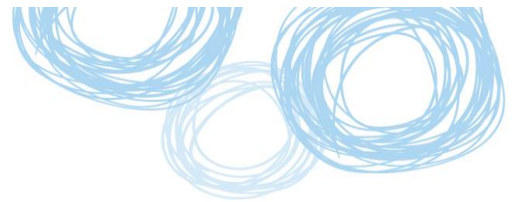
Evidence provided includes:

- Policy documents regarding compliance and co-operation with its Registering Body in the conducting of audits and monitoring of its operations.
- Reporting of Quality Indicator Data, NT Pims reporting and VET online reporting of student data as required by User Choice Contract and AVETMISS reporting of student data on monthly schedule.
- Records management procedure demonstrating how it implements electronic retention, storing and archiving of records according to the registering body requirements and timeframes. The RTO uses 'Wise.net.' to record student data
- Financial statements for Year ended 30 June 2010.
- Letter from Bruce Eldridge (Acting Chief Financial Officer) and Gary Hooper (Managing Director and CEO) advising that the 'STEPS Training' legal entity has an undertaking from the Board of Management of STEPS Disability QLD Inc to assure the financial viability and debts of STEPS Training.

Evidence checklist:

Evidence provided confirms:

- | | Y | N |
|--|---|---|
| <ul style="list-style-type: none"> ■ The RTO's Chief Executive must ensure that the RTO cooperates with its registering body: <ul style="list-style-type: none"> a. in the conduct of audits and in the monitoring of its operations <input checked="" type="checkbox"/> <input type="checkbox"/> b. by providing accurate and timely data relevant to measures of its performance <input checked="" type="checkbox"/> <input type="checkbox"/> c. by providing timely information about significant changes to its operations <input checked="" type="checkbox"/> <input type="checkbox"/> d. by providing timely information about significant changes to its ownership <input checked="" type="checkbox"/> <input type="checkbox"/> e. in the retention, archiving, retrieval and transfer of records consistent with its registering body's requirements <input checked="" type="checkbox"/> <input type="checkbox"/> f. by providing a statement demonstrating its financial viability, and/or its annual financial statements, and/or a business plan on request of the registering body. <input checked="" type="checkbox"/> <input type="checkbox"/> | | |



Condition 3 – Compliance with Legislation

At time of audit: Compliant Not Compliant

Description of evidence sighted:

- The RTO's policy for compliance with relevant legislation from Commonwealth and State regulatory authorities. The policy outlined the relevant legislation as applicable to the operations of STEPS Training and is available to all staff.
- Student handbook including legislative requirements.
- Statements of attendance of staff for different professional development workshops with regard to compliance and operations within the VET sector.

Evidence checklist:

Evidence provided confirms:	Y	N
▪ The RTO must comply with relevant Commonwealth, State or Territory legislation and regulatory requirements that are relevant to its operations and its scope of registration.	<input checked="" type="checkbox"/>	<input type="checkbox"/>
▪ It ensures its staff and clients are fully informed of these requirements that affect their duties or participation in vocational education and training.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Condition 4 - Insurance

At time of audit: Compliant Not Compliant

Description of evidence sighted:

- Certificate of Insurance for Public Liability issued by AMP– 11/5/2011 to 11/5/ 2012 for \$ 20,000,000
- Correspondence and letter of advice from Advice Partners, General Insurance regarding the appropriate amount of cover.

Evidence checklist:

Evidence provided confirms:	Y	N
▪ The RTO holds insurance for public liability throughout its registration period that is suitable for the size and scope of its operations.	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Condition 5 – Financial Management

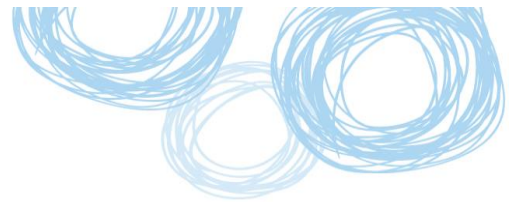
At time of audit: Compliant Not Compliant

Description of evidence sighted:

- The organisation provided advice indicating that it is an enterprise RTO and as such does not advertise, collect or hold fees from students. Therefore, items 2, 3 and 4(i) are not applicable
- Annual report for STEPS (the parent organisation)
- Financial Management Policy
- Refund Policy and 'Withdrawal And/Or Refund Form'
- Procedures for fees and charges; qualifications issuance; withdrawal and refund.

Evidence checklist:

Evidence provided confirms:	Y	N



- The RTO must be able to demonstrate to its registering body, on request, that it is financially viable at all times during the period of its registration.
- The RTO must clearly express the following fee information to each client in a language that clients understand:
 - 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 RTO 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 upon completion of training and assessment, and
 - e) The organisation's refund policy.
- The evidence provided relating to fee information supports the RTO's statement regarding collection of fees in advance (below).

Does the organisation collect fees in advance from students?

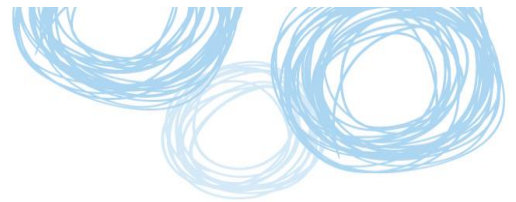
- Yes – continue No – bypass next dot point

Evidence provided confirms **how, after 3 January 2011:**

- Cross which option is nominated on application
- Where the RTO collects fees in advance it must ensure it complies with one of the following options:
 - Option 1 – The RTO is administered by a state, territory or commonwealth government agency, or
~~Option 2 – The RTO holds current membership of an approved Tuition Assurance Scheme, or~~
 [Option not currently possible]
 - Option 3 – The RTO may accept payment of no more than \$1000 from each individual student prior to the commencement of the course. Following course commencement, the RTO 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, or
 - Option 4 – The RTO holds an unconditional financial guarantee from a bank operating in Australia for no less than the full amount of funds held by the RTO which are prepayments from students (or future students) for tuition to be provided by the RTO to those students, or
 - Option 5 – The RTO has alternative fee protection measures of equal rigour approved by the registering body.
 [A description of the alternative measures proposed must be provided and accompanied by a comprehensive explanation demonstrating how the proposed measures are of a rigour equal to Options 1 – 4. The Director, Training Quality, will determine whether the RTO's fee protection measures demonstrate equal rigour.]
 - The RTO cannot yet demonstrate compliance with the fees paid in advance option 2 as it is awaiting advice from NQC regarding what constitutes an approved Tuition Approval Scheme.

Evidence provided confirms:

- The RTO must have its accounts certified by a qualified Accountant to Australian Accounting Standards at least annually, and provide the certificate to its registering body on request. If the registering body reasonably deems



it necessary, the chief executive must provide a full audit report on the RTO's financial accounts from a qualified and independent accountant.

Condition 6 – Certification & Issuing of Qualifications & Statements of Attainment

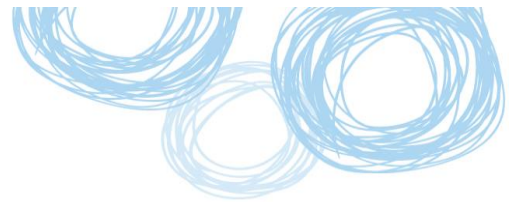
At time of audit: Compliant Not Compliant

Description of evidence sighted:

- The RTO provided evidence of its records management procedure that aligns with the Department's requirements for the retention of student records and assessments.
- Templates of a statement of attainment and certificate that comply with the requirements of the Australian Qualifications Framework, provides the RTO provider number and uses the NRT logo in accordance with the current conditions of use.
- 'STEPS Training Issuance of Qualifications Procedure'.
- The RTO uses the Wise.net system for management of student records. This database system is capable of providing AVETMISS compliant data.

Evidence checklist:

Evidence provided confirms:	Y	N
<ul style="list-style-type: none"> ▪ The RTO must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or accredited course, a qualification or statement of attainment (as appropriate) that: <ul style="list-style-type: none"> a. meets the Australian Qualifications Framework (AQF) requirements <input checked="" type="checkbox"/> <input type="checkbox"/> b. identifies the RTO by its national provider number from the National Training Information Service <input checked="" type="checkbox"/> <input type="checkbox"/> c. includes the Nationally Recognised Training (NRT) logo in accordance with the current conditions of use. <input checked="" type="checkbox"/> <input type="checkbox"/> ▪ The RTO must retain client records of attainment of units of competency and qualifications for a period of 30 years. <input checked="" type="checkbox"/> <input type="checkbox"/> ▪ The RTO must have a student records management system in place that has the capacity to provide the registering body with AVETMISS compliant data. <input checked="" type="checkbox"/> <input type="checkbox"/> <p>[Evidence required to demonstrate how the RTO plans to comply by 3 January 2011]</p>		
<ul style="list-style-type: none"> ▪ The RTO must provide returns of its client records of attainment of units of competency and qualifications to its registering body on a regular basis, as determined by the registering body. <input checked="" type="checkbox"/> <input type="checkbox"/> ▪ The RTO must meet the requirements for implementation of a national unique student identifier. <input type="checkbox"/> <input type="checkbox"/> <p>[Not required until implementation plan is published on www.training.com.au]</p>		



Condition 7 – Recognition of Qualifications Issued by Other RTOs			
At time of audit:	<input checked="" type="checkbox"/> Compliant	<input type="checkbox"/> Not Compliant	
Description of evidence sighted:			
<ul style="list-style-type: none"> The RTO provided evidence of its procedure for the recognition of AQF qualifications. Provided its staff and student handbook where information is provided to staff and students regarding recognition of qualifications (credit transfers and RPL). 			
Evidence checklist:			
Evidence provided confirms:		Y	N
<ul style="list-style-type: none"> The RTO recognises the AQF Qualifications and Statements of Attainment issued by any other RTO. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	

Condition 8 – Accuracy and Integrity of Marketing			
At time of audit:	<input checked="" type="checkbox"/> Compliant	<input type="checkbox"/> Not Compliant	
Description of evidence sighted:			
<ul style="list-style-type: none"> The RTO provided evidence a range of marketing/promotional materials to demonstrate its accuracy and integrity of marketing. Further, the NRT logo is used in accordance with its conditions of use. 			
Evidence checklist:			
Evidence provided confirms:		Y	N
<ul style="list-style-type: none"> The RTO must ensure that its marketing and advertising of AQF qualifications to prospective clients is ethical, accurate and consistent with its scope of registration. The NRT logo must be employed only in accordance with its conditions of use. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

Condition 9 – Transition to Training Packages/Expiry of Accredited Courses			
At time of audit:	<input checked="" type="checkbox"/> Compliant	<input type="checkbox"/> Not Compliant	
Description of evidence sighted:			
<ul style="list-style-type: none"> The organisation provided evidence of its process for the development of training/assessment strategies which includes transition requirements and ensuring that training package currency requirements are met. 			
Evidence checklist:			
Evidence provided confirms:		Y	N
<ul style="list-style-type: none"> The RTO must manage the transition from superseded Training Packages within 12 months of their publication on the National Training Information Service. The RTO must also manage the transition from superseded accredited courses so that it delivers only currently endorsed Training Packages or currently accredited courses. 	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>