

2 April 2013



Australian Government
Australian Skills Quality Authority

Mr Graeme De Goldi
Australian College of Health and Fitness Pty Ltd
72 Mount Road
Heidelberg VIC 3084

File No: 1019967
Ref No: 21906

Dear Mr De Goldi

Re: Outcome of renewal of registration application—granted

I refer to your application to renew your registration as a national VET regulator (NVR) registered training organisation (RTO).

In accordance with the provisions of the *National Vocational Education and Training Regulator Act 2011* (the Act), your application for registration has been granted. A copy of the final audit report is attached for your reference.

The National Register has been updated to include the following key details of your organisation:


Legal name:	Australian College of Health and Fitness Pty Ltd
Trading name/s (if relevant):	Melbourne Institute of Massage Therapy
RTO ID number:	21906

Period of registration

Your organisation has been granted registration for a period of 5 years which commenced on 28 March 2013 and is due to expire on 27 March 2018. A Certificate of Registration is attached. You can apply to the Australian Skills Quality Authority (ASQA) to renew or withdraw your organisation's registration, and timeframes and obligations apply to each process. There are also obligations on organisations that effectively cease to operate, even though they remain registered as RTOs. Further information about obligations in these circumstances is available from the ASQA website at www.asqa.gov.au

Scope of registration

The organisation's scope of registration – the vocational education and training (VET) courses that your organisation is registered to provide – is listed on the National Register. Please note that Sections 93-94 of the Act provide for the imposition of monetary penalties on RTOs that provide all or part of a VET course outside scope of registration.



If the training and assessment provided is likely to lead to students applying for a licence/recognition to operate in a relevant industry, you will need to ensure that you meet the requirements of the relevant national or state/territory regulator/s. Please contact the relevant regulator/s to ensure you have satisfied regulatory requirements before delivery and ensure that marketing materials are accurate.

Changes to scope of registration

You must apply to ASQA if your organisation wishes to change its scope of registration by either adding or removing a VET course. Information on the process to make changes to your scope of registration is available from the ASQA website at www.asqa.gov.au

RTO ID number

You **must** quote your organisation's RTO ID number in all future correspondence with ASQA. This number **must** also be included on the qualifications and statements of attainment that you issue and the marketing materials that you use as an RTO.

Maintaining compliance

I wish to remind you that you have signed a statutory declaration in which you have accepted responsibility for ensuring compliance with the VET Quality Framework. This framework comprises the following components:

- the Standards for NVR Registered Training Organisations
- the Australian Qualifications Framework
- the Fit and Proper Person Requirements of the Act
- the Financial Viability Risk Assessment Requirements of the Act
- the Data Provision Requirements of the Act.

This is an important commitment that requires you to actively manage and monitor your RTO's activities to ensure that compliance is maintained at all times and across all of your operations.

RTO compliance is the mandated foundation upon which organisations should plan and achieve quality improvements to their training and assessment services.

ASQA fees and charges

Please refer to ASQA website for details of fees and charges that apply to your registration: [www.asqa.gov.au/About ASQA/Fees & Charges](http://www.asqa.gov.au/About%20ASQA/Fees%20&%20Charges).

Conditions of registration

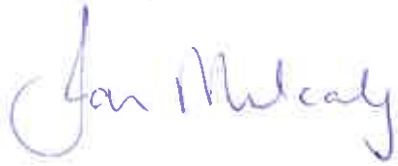
You are required to comply with the conditions of registration set out in Sections 22-28 of the Act, as well as any additional conditions that ASQA, as the national VET regulator, has imposed on your organisation's registration.

There are no additional conditions imposed on your organisation's registration.

Further information and assistance

If you require further information or assistance in relation to this matter, please contact Mr Leslie Comley on telephone 03 9954 2779 or by email at complinacemlb@asqa.gov.au.

Yours sincerely



Jan Mulcahy

Acting Regional Manager Compliance Operations



VET Quality Framework audit report

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

Legal name of organisation	Australian College of Health and Fitness Pty Ltd
Date/s of audit	8 – 9 November 2012

ORGANISATION DETAILS				
RTO legal name	Australian College of Health and Fitness Pty Ltd		RTO ID number	21906
Registered business trading name	Melbourne Institute for Massage Therapy		ABN	43 123 508 305
Address	72 Mount Road, Heidelberg			Postcode 3084
Phone	03 9455 1926	Fax	03 9455 1851	
E-mail	micala.jacobs@mimt.com.au		Website	www.mimt.com.au
Registration contact	Name	Micala Jacobs	Position	Administration Manager
AUDIT TEAM				
Lead auditor	Les Comley		Technical adviser/s	
Audit team members	Fred Garai			
ASQA CONTACT DETAILS				
Phone	1300 701801 (ASQA Info line)		E-mail	compliancemelb@asqa.gov.au
AUDIT DETAILS				
Audit type	<input checked="" type="checkbox"/> Renewal of registration <input type="checkbox"/> Extension to scope of registration <input type="checkbox"/> Compliance monitoring (incl. post-initial registration) <input type="checkbox"/> Other:			
Scope of audit	<input checked="" type="checkbox"/> Standards for NVR Registered Training Organisations <input checked="" type="checkbox"/> Australian Qualifications Framework (AQF) <input checked="" type="checkbox"/> Data Provision Requirements <input type="checkbox"/> Fit and Proper Person Requirements <input type="checkbox"/> Financial Viability Risk Assessment Requirements			
Date/s of site visit/s	8 – 9 November 2012			
Site/s visited	72 Mount Road, Heidelberg 84 Mount Road, Heidelberg Training Station Gym, The rear 124 James Street Templestowe			
Standards audited	Essential Standards for Continuing Registration 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25			
ORGANISATION				
<p>The RTO delivers qualifications in:</p> <ul style="list-style-type: none"> • HLT40307 Certificate IV in Massage Therapy Practice • HLT50307 Diploma of remedial Massage • SIS30310 Certificate III in Fitness • SIS40210 Certificate IV in Fitness • 21920VIC Advanced Diploma of Remedial Massage (Myotherapy). <p>Number of enrolled students as at 8 November 2012 was 152.</p> <p>Training is delivered to students on a fee-for-service and government-funded basis.</p> <p>The RTO employs 21 staff (including 16 trainers) primarily on a casual basis.</p> <p>The RTO does not have any partnership arrangements in place with other training RTOs.</p>				

Graeme De Goldi advised the audit team that the Melbourne Institute for Massage Therapy was a trading name for the Australian College of Health and Fitness Pty Ltd and that the incorporated body had only been in existence since 1 July 2012. Prior to 1 July 2012 the Melbourne Institute for Massage Therapy was the trading name for Wrenly Pty Ltd as trustee for the De Goldi Family Trust.

FOCUS OF AUDIT		
Code	Qualification / Accredited course name	Mode(s) of delivery &/or assessment
HLT40307	Certificate IV in Massage Therapy Practice	Delivery Mode: Blended learning consisting of F2F classroom, & on line. Assessment method/s: Practical demo with assessment/s, work books, written assessment,
HLT50307	Diploma of Remedial Massage	Delivery Mode: F2F classroom, Assessment method/s: Practical demo with assessment/s, work books, written assessment,
SIS30310	Certificate III in Fitness	Delivery Mode: F2F classroom, Assessment method/s: Practical demo with assessment/s, work books, written assessment,
SIS40210	Certificate IV in Fitness	Delivery Mode: F2F classroom, Assessment method/s: Practical demo with assessment/s, work books, written assessment,

INTERVIEWEES		
Staff (name and position)		
Name	Position	Program (qualification, course, etc)
Graeme De Goldi	Director	
Micala Jacobs	Campus Manager	
Karla Stapleton	Student Administration Manager/Welfare Officer	
Nicole Maloni	Compliance Officer	
Steve Rogers	Business Development Manager	

SUMMARY OF AUDIT OUTCOME

This audit was conducted under the *National Vocational Education and Training Regulator Act 2011* (the Act) to assess compliance with requirements of the VET Quality Framework as identified under the Scope of Audit section above.

AUDIT OUTCOME

Audit status as at 9 November 2012

The organisation has not demonstrated compliance with all compliance requirements reviewed for the audit.

The level of non-compliance is considered critical when considering the potential for adverse impact on the quality of training and assessment outcomes for students.

The audit report describes evidence of non-compliance identified. Each issue referenced must be rectified by the organisation with evidence provided to ASQA within **20 working days** of the date of the letter accompanying this audit report to demonstrate corrective actions implemented.

Auditor's Name	Les Comley	Signature		Date of Report	11 December 2012
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AUDIT RECTIFICATION

Audit status following additional evidence received 29 January 2013

The organisation has demonstrated compliance with all compliance requirements reviewed for the audit.

Auditor's Name	Les Comley	Signature		Date of Report	28 March 2013
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AUDIT SUMMARY OF VET QUALITY FRAMEWORK REQUIREMENTS

VET QUALITY FRAMEWORK COMPONENT		STATUS*
Financial Viability Risk Assessment Requirements		<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
Fit and Proper Person Requirements		<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
Data Provision Requirements		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
Australian Qualifications Framework (AQF) Requirements		<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
Standards for NVR Registered Training Organisations 2011 - Essential Standards for Continuing Registration		
15	The NVR registered training organisation provides quality training and assessment across all of its operations	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
16	The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
17	Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
18	The NVR registered training organisation has governance arrangements in place	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
19	Interactions with the National VET Regulator	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
20	Compliance with legislation	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
21	Insurance	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
22	Financial management	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
23	Certification, issuing and recognition of qualifications and statements of attainment	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
24	Accuracy and integrity of marketing	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
25	Transition to training packages/expiry of VET accredited courses	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
*STATUS: Status of audit findings when audit was conducted		C = Compliant NC = Not Compliant NA = Not audited

Audit Findings

Australian Qualifications Framework

At the original audit the RTO did not have a certificate register that met the requirements of the AQF Qualifications Register Policy as the register submitted at audit (Item 15) did not list qualifications by their full title.

The RTO was required to review and revise its certificate register to ensure that it complies with AQF requirements.

The RTO submitted evidence of a revised register which included all of the requirements of the AQF Qualifications Register Policy.

Finding as at 13 February 2013:

The RTO was compliant with the requirements of the AQF.

SNR15.1 The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.

At the original audit the RTO was not compliant with this Standard.

There was evidence that the RTO had collected information from a variety of sources which were documented in the Continuous Improvement policy and procedure (Item 53). However, all changes arising from the analysis of data is not recorded in the Continuous Improvement Register as required by the RTOs' procedures.

The Continuous Improvement Register (Item 30) had not been '*reviewed on a regular basis by the Campus Manager*' or biannually '*by the Director*' as required by the Continuous Improvement Policy and Procedures (Item 53).

The Continuous Improvement Register (Item 30) listed a number of suggested improvements which were shown as having been completed in March 2012 but there was no indication that the outcomes had been reviewed as required by the Continuous Improvement Policy and Procedures (Item 53). It was noted that a review was scheduled for 1 January 2013.

The RTO was required to review, revise and fully implement its continuous improvement processes to ensure that it collects, analyses and acts upon data to improve the quality of training and assessment.

The RTO submitted evidence of:

1. Its policy and procedure, *Continuous Improvement* which was unchanged from the version sighted at the original audit. This identified a range of data collection sources including:
 - Learners – learner satisfaction
 - Staff – staff feedback
 - Internal audit reports
 - Sessions for the validation and moderation of training materials
 - Database - VETtrak reports of student performance
 - Competency completion data
 - Register of complaints
 - Training and assessment strategies
 - Register of improvements
2. The policy and procedure which stated that improvements to training and assessment may be evidenced by changes to training and assessment resources, professional development activities and implementation of an assessment process which is consistent with the principles of assessment.
3. Extract of the Continuous Improvement Register
4. Records of a Monthly Continuous Improvement Meeting (11 January 2013) review of 'recently' implemented items.

Finding as at 28 March 2013:

The Monthly Continuous Improvement Meeting (11 January 2013) records indicated that the outcomes for continuous improvement had been reviewed as required by the Continuous Improvement policy and procedures. This review was in line with the schedule sighted at the original audit.

There were some anomalies with regard to the information provided to ASQA (Items 50 – 54 and 56 which were logged in the Continuous Improvement Register but which had not been reviewed at the January meeting). However these anomalies were clarified by the Lead Auditor in a discussion with Micala Jacobs, Administration Manager on 28 March 2013.

The RTO had demonstrated compliance with this Standard.

SNR 15.2 Strategies for training and assessment used by the meet the requirements of the relevant training package or accredited course and have been developed through effective consultation with industry

At the original audit the RTO was not compliant with this Standard.

The Training and Assessment Strategy for HLT40307 Certificate IV in Massage Therapy Practice was not packaged in accordance with Training Package requirements:

- a. Units of competency were incorrectly coded:
 - i. HLTCOM408C Use specific health terminology to communicate effectively was

coded as HLTCOM408D

- ii. HLTHIR301B Communicate and work effectively in health was coded as HLTHIR301C.
- iii. HLTREM401C Work within a massage framework was coded as HLTREM401D
- b. A unit of competency was incorrectly coded and showed an incorrect title. The unit of competency HLT0HS300B Contribute to OHS processes was shown as HLTWHS300A Contribute to the OHS process (p.4, Item 2) and as HLTWHS300A Contribute to WHS processes (p.17, Item 2).

Several of these units were taken from the new HLT40312 Certificate IV in Massage Therapy Practice version of the qualification and, as such, are outside of the RTO's scope of registration and are, therefore, not available for delivery as this qualification was not on the RTO's scope of registration.

The Training and Assessment Strategy for HLT50307 Diploma of Remedial Massage did not meet Training Package requirements. The documented strategy stated that 15 units were required to be completed and listed 16 units of competency as comprising the qualification. The Training package requirements are for 14 units of competency to be completed for this qualification.

The Training and Assessment Strategy for SIS30310 Certificate III in Fitness was not packaged in accordance with Training Package requirements. The unit of competency HLTFA301B *Apply first aid* was coded as HLTFA301C.

The Training and Assessment Strategy for SIS40210 Certificate IV in Fitness was not packaged in accordance with Training Package requirements. The unit of competency CHCIC301D Interact effectively with children was coded as CHCIC301E.

The Training and Assessment Strategies (Item 2) did not reflect the outcomes and processes identified in the RTO's documented Training and Assessment Strategy Policy and Procedures (Item 53).

- a. The Training and Assessment Strategies did not show evidence of having been developed in consultation with industry
- b. The training and assessment strategies did not include sufficient information to ensure that trainers and assessors were fully informed of the resources, facilities and equipment that was required to undertake delivery and assessment.
- c. The Training and Assessment Strategy for HLT50307 Remedial Massage included a trainer matrix (p4 – 5) but this had been prepared for the Certificate IV in Massage Therapy Practice or alternatively required trainers and assessors to only have vocational competence for the lower level qualification.
- d. The Training and Assessment Strategies did not provide details regarding the language, literacy and numeracy (LLN) processes to be used to assess the learning needs of prospective students. There was no information provided as to how and who would undertake the assessment of the LLN skills.

The RTO's Continuous Improvement and the Training and Assessment policies and procedures (pages 6 and 3 respectively) (Item 53) indicated that reasonable adjustment would be identified and implemented via changes to the assessment resources. However there were no instructions in the training and assessment strategies to guide the assessors regarding the identification and implementation of reasonable adjustment.

Under the assessment process in the Training and Assessment Strategies it was stated that training was delivered in clusters and assessed holistically. There was no guidance provided to show which units of competency had been clustered or were to be delivered together.

No instruction was provided regarding the recording of assessment outcomes, processing, recordkeeping arrangements, and how feedback was to be provided to the student.

Students undertake work-based training as part of clinical assessment activities. However, the RTO's delivery and assessment strategies did not reflect that work-based training formed part of its training methodology for HLT40307 Certificate IV in Massage Therapy Practice and HLT50307 Diploma of Remedial Massage. .

The RTO was required to:

- Develop and fully implement processes to undertake effective consultation with industry in the development of each of its training and assessment strategies
- Review and revise all of its training and assessment strategies to ensure that they meet Training Package requirements
- Review and revise all of its training and assessment strategies to ensure that they include sufficient information to enable that trainers and assessors to identify and locate the resources, facilities and equipment required to undertake delivery and assessment.
- Review and revise all of its training and assessment strategies to ensure that the information provided is complete and accurate.
- Review and revise all of its training and assessment strategies to ensure that trainers and assessors are provided with guidance regarding:
 - the implementation of reasonable adjustment
 - clustered delivery
 - holistic assessment
 - recording and processing assessment outcomes
 - providing feedback to the student.
- Review and revise all of its training and assessment strategies to ensure that the delivery and assessment methodologies are those that are actually being implemented.

Rectification evidence review included:

- Revised Training and Assessment Strategies for the qualifications audited
- Revised Assessment and RPL policy and procedure
- Assessment validation schedule and copies of validation meeting record sheet

Finding as at 21 February 2013

The RTO demonstrated that it had complied with the rectification requirements. The RTO was compliant with this SNR.

SNR 15.3 Staff, facilities, equipment, training and assessment materials

At the original audit the RTO was not compliant with this Standard.

The RTO had nineteen (19) trainers and assessors however, only six of the trainers and assessors (Frances Bremner, Robert Granter, Elisa Lee, Stewart McDonald, Matthew Matoli, Elizabeth Pazilidis) complied with the NSSC guidelines for trainers and assessors as required by the relevant Training Package.

Assessment tools did not meet the Training Package requirements. For example the unit of competency HLTREM401C Work within a massage framework required assessment to include tasks so that:

- consistency of performance was demonstrated over the required range of situations relevant to the workplace; and
- observation of performance was undertaken.

The assessment tools comprised written assessment and a student work book. Neither addressed the assessment requirements identified within the Training Package.

Students undertake work-based training as part of clinical assessment activities. However, the RTO has no process/es in place to ensure that the sites where these activities are undertaken met Training Package requirements.

The RTO was required to:

- Review and revise its staffing arrangements to ensure that the NSSC guidelines for all trainers and assessors are adhered to.
- Review and revise all of the assessment tools for all of the units of competency covered by its scope of registration to ensure that Training Package requirements are met.
- Develop and fully implement processes to ensure that work-based training sites meet Training package requirements.

Rectification evidence reviewed included:

- NSSC Communique of the 8 December 2011
- Enrolment verification of Graeme De Goldi to undertake the TAE40110 Certificate IV in Training and Assessment with Plenty Training.
- The organisation's policy and procedure for unqualified trainers and assessors.
- The organisations plan for the management of trainers and assessors that are required to upgrade to the TAE40110 Certificate IV in Training and Assessment before 1 July 2013

Finding as at 21 February 2013

The RTO was now compliant with this SNR.

SNR 15.4 Trainers and assessors

At the original audit the RTO was not compliant with this Standard.

There were thirteen trainers and assessors (Steven Rogers, Perry Adams, Gail Breckon, Lily Chiu, George Dellas, Graeme De Goldi, George Forlanski, Wendy Kemp, Ruth Charlton, Greg McMillan, Derek Migletti, Carl Ridgeway, Michael Stanborough) who did not satisfy the NSSC guidelines and the RTO did not have supervision arrangements in place for those staff. At the closing meeting the RTO claimed that supervision agreements were in place for all staff that did not meet the NSSC requirements and agreed to provide copies of those arrangements to ASQA by 13 November 2012. However only four supervision agreements (for Perry Adams, Michael Stanborough, Carl Ridgeway and Steven Rogers) were submitted to ASQA by 13 November 2012. The supervision was undertaken by Graeme De Goldi who was not qualified to act in this role. Graeme De Goldi did not hold a TAE40110 Certificate IV in Training and Assessment and for whom the RTO had equivalence.

The RTO was required to:

Review, revise and fully implement its employment arrangements as they apply to all trainers and assessors to ensure that NSSC guidelines are being met.

Rectification evidence reviewed included:

- Enrolment verification of Graeme De Goldi to undertake the TAE40110 Certificate IV in Training and Assessment with Plenty Training.
- The organisations policy and procedure for unqualified trainers and assessors.
- The organisations plan for the management of trainers and assessors that are required to upgrade to the TAE40110 Certificate IV in Training and Assessment before 1 July 2013

Finding as at 21 February 2013

The RTO was now compliant with this SNR.

SNR 15.5 Assessment

At the original audit the RTO was not compliant with this Standard.

Assessment tools audited were:

- BSBSM401A Establish legal and risk management requirements of small business
- HLTCOM408C Use specific health terminology to communicate effectively
- HLTCOM502C Develop professional expertise
- HLTREM401C Work within a massage framework;
- HLTREM510B Provide specialised remedial massage treatments
- SISFFIT303A Develop and apply an awareness of specific populations to exercise delivery

- SISFFIT418A Undertake appraisals of functional movement
- SISXRSK301A Undertake risk analysis of activities

Instructions for assessors were unclear and unsuitable for ensuring that performance standards would be consistently applied across a range of assessors.

Assessment tools did not meet the principles of assessment and the rules of evidence.

Assessment tools would not collect sufficient evidence to satisfy Training Package requirements for the essential knowledge and skills.

Assessment tools did not require the practical application of skills to be sufficiently demonstrated.

The RTO had not engaged in systematic assessment validation processes and that the processes it had undertaken had not resulted in improvements to assessment methods, instruments or tools.

The RTO was required to:

- Review and revise all assessment tools for all units of competency covered by its scope of registration to ensure that:
 - assessors are provided with clear instructions regarding the required standards of performance for each assessment task/activity
 - the principles of assessment and rules of evidence have been implemented
 - all Training Package requirements have been addressed.
- Develop and fully implement a process or processes to enable the systematic validation of assessment.

Review of the rectification evidence:

The review of the rectification evidence reviewed covered:

- SIS30310 Certificate III in Fitness
- HLT40307 Certificate IV in Massage therapy practice
- SIS40210 Certificate IV in Fitness
- HLT50307 Diploma of remedial massage.

The evidence reviewed included:

- Training and Assessment Strategy outline
- Subject/Unit map
- Unit outline & Assessor guide
- Unit Assessment mapping
- Delivery & assessment strategies
- Assessment tools and assessor marking guides for a sample of units of competency.

Finding as at 21 February 2013

The rectification evidence reviewed showed that the RTO demonstrated rectification to ensure that assessment was able to be conducted in accordance with the Training Package requirements.

The RTO was now compliant with this SNR.

SNR16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data

At the original audit the RTO was not compliant with this Standard.

Although there was evidence (refer Continuous Improvement Register (Item 30) and LLN materials submitted with Item 51) that the RTO had made changes to its pre-training review documentation which included the collection of LLN data there was no process implemented to ensure that the changes made were appropriate or acceptable.

The RTO was required to develop and fully implement its continuous improvement processes to ensure that it collects, analyses and acts upon data to improve its client services

The RTO submitted evidence of:

1. Its policy and procedure, *Continuous Improvement*. This identified a range of data collection sources

including:

- Learners – learner satisfaction
 - Staff – staff feedback
 - Internal audit reports
 - Sessions for the validation and moderation of training materials
 - Database - VETtrak reports of student performance
 - Competency completion data
 - Register of complaints
 - Training and assessment strategies
 - Register of improvements
2. The policy and procedure which stated that improvements to training and assessment may be evidenced by changes to training and assessment resources, professional development activities and implementation of an assessment process which is consistent with the principles of assessment
 3. Extract of the Continuous Improvement Register
 4. Records of a Monthly Continuous Improvement Meeting (11 January 2013) review of 'recently' implemented items
 5. Pre-training Review
 6. A marking guide for the MMP-AX1 Practical Assessment.

Finding as at 28 March 2013:

The Monthly Continuous Improvement Meeting (11 January 2013) records indicated that the outcomes for continuous improvement had been reviewed as required by the Continuous Improvement policy and procedures. This review was in line with the schedule sighted at the original audit.

There were some anomalies with regard to the information provided to ASQA (Items 50 – 54 and 56 which were logged in the Continuous Improvement Register but which had not been reviewed at the January meeting). However these anomalies were clarified by the Lead Auditor in a discussion with Micala Jacobs, Administration Manager on 28 March 2013.

The RTO had demonstrated compliance with this Standard.

SNR16.3 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.

At the original audit the RTO was not compliant with this Standard.

A student manual included information regarding fees and other costs associated with the Certificate IV in Massage Therapy Practice. The information regarding instalments payable by full fee paying students (\$1250) was inconsistent with the Enrolment Form (\$1325).

The RTO was required to review and revise the information provided to students prior to their enrolment to ensure that it is consistent and accurate.

The RTO submitted as evidence its student manual for the Certificate IV in Massage Therapy Practice.

Finding as at 13 February 2013:

Page 26 showed that 4 instalments of \$1325 each were to be paid by the student. The information in the student manual was consistent with the RTO's enrolment form sighted at the original audit.

The RTO was compliant with this Standard.

SNR16.6 Learners have timely access to current and accurate records of their participation and progress

At the original audit the RTO was not compliant with this Standard.

Whilst information was provided to prospective students regarding the access to details of their participation and progress (refer Student Pre-enrolment Information Handbook 2012 (Item 10)), the same information was

not provided to enrolled students (refer Student Manual Certificate IV in Massage Therapy Practice (Item 11)). Therefore, learners do not have access to the information to enable them to gain access to records of their participation and progress.

The RTO was required to develop, document and distribute information to ensure that enrolled students are provided with the information to enable them to access records about their participation and progress on a timely basis.

The RTO submitted as evidence its Student Manual for the Certificate IV in Massage Therapy Practice.

Finding as at 13 February 2013:

Section 2.12 Access to Student Records (p.10) of the Student Manual for the Certificate IV in Massage Therapy Practice included information for students regarding the process required to gain access to their student records.

The RTO was compliant with this Standard.

SNR16.7 The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively

At the original audit the RTO was not compliant with this Standard.

The RTO had provided inaccurate advice to students regarding the external appeals process.

Initially citing the CEO of the Australian Association of Massage Therapists (AAMT) as the external mediator, the RTO later advised the audit team that ACPET would act in this role. The RTO was unaware that ACPET had charged for these services.

The RTO later advised the audit team that ACPET had only just removed student appeal mediation from the range of services it provided to its members.

On 12 November 2012 the RTO submitted a revised policy and procedure which listed the Dispute Settlement Centre of Victoria (DSCV) as the external appeals body but did not show that this change had been communicated to students.

The RTO was required to distribute the revised information regarding complaints and appeals to all of its students to ensure that they are fully informed about the complaints and appeals processes available to them and that they are able to access those processes in a timely manner.

The RTO evidence which included:

- Complaints and Appeals policy and procedure
- Student Enrolment Information Handbook 2013
- Student Manual for the Certificate IV in Massage Therapy Practice

Finding as at 13 February 2013:

The Complaints and Appeals policy and procedure listed the Dispute Settlement Centre of Victoria as its external appeal mediator (p. 5). This information was also provided in the Student Enrolment Information Handbook 2013 (p. 8) and the Student Manual for the Certificate IV in Massage Therapy Practice (p. 18).

There was no specific information showing that the information had been disseminated to students however, the availability of the information in pre-enrolment material and in a student manual are indicators that distribution of the details of the policy and procedure was possible.

The RTO was compliant with this Standard.

SNR17.1 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.

At the original audit the RTO was not compliant with this Standard.

The RTO's Management of Systems & Continuous Improvement Policy and Procedure required each student to be issued with a training plan which is to be reviewed every 8 – 12 weeks by the trainer or compliance officer.

This process if implemented would ensure that students were receiving the services outlined in their agreements. However, the student files reviewed showed that one student had not been issued with a training plan (Grazia Gioffre (Item 32)) there was no evidence that the plans had been reviewed by the relevant staff.

The RTO was required to review and, if necessary, revise and fully implement its processes to ensure that students were receiving the services outlined in their agreements with the RTO.

The RTO evidence which included a copy of a training plan for Grazia Gioffre.

The RTO's response also indicated that a student file audit schedule/calendar was to be submitted as rectification evidence. The purpose of the audit schedule/calendar was to demonstrate that the files had been checked off against the 'New Student Setup Checklist.' The student file audit schedule/calendar was not sighted at the rectification audit.

Finding as at 13 February 2013:

The RTO did not submit evidence that the trainer or compliance officer reviewed training plans every 8 -12 weeks as required by the Management of Systems & Continuous Improvement Policy and Procedure.

Whilst the RTO had provided a copy of the training plan for Grazia Gioffre this document did not provide evidence that showed that the RTO's documented procedure for ensuring that students were receiving the agreed services.

A copy of the New Student Setup Checklist was provided as evidence against SNR 17.4 but again, this document did not provide any evidence that showed that the RTO had implemented its documented Management of Systems & Continuous Improvement Policy and Procedure which required the trainer or compliance officer to review training plans every 8 -12 weeks.

SNR17.2 The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations

At the original audit the RTO was not compliant with this Standard.

The RTO's approach to continuous improvement was not systematic. The RTO provided several documents/records to demonstrate its implementation of its continuous improvement processes. However, the evidence identified showed that whilst the RTO collected, analysed and in some cases identified actions but has no processes in place to ensure that the required actions have been undertaken (refer Continuous Improvement Register, Administration Meeting Minutes, Trainers' Meeting Minutes, Internal Audit Report (Item 52)).

The RTO was required to review, revise and fully implement its processes for continuous improvement to systematically ensure that the actions identified to improve its operations have been undertaken.

The RTO evidence included:

1. Its policy and procedure, *Continuous Improvement*. This identified a range of data collection sources including:
 - Learners – learner satisfaction
 - Staff – staff feedback
 - Internal audit reports
 - Sessions for the validation and moderation of training materials
 - Database - VETtrak reports of student performance
 - Competency completion data
 - Register of complaints
 - Training and assessment strategies
 - Register of improvements
2. Extract of the Continuous Improvement Register
3. Records of a Monthly Continuous Improvement Meeting (11 January 2013) review of 'recently' implemented items

Finding as at 28 March 2013:

The Monthly Continuous Improvement Meeting (11 January 2013) records indicated that the outcomes for continuous improvement had been reviewed as required by the Continuous Improvement policy and procedures. This review was in line with the schedule sighted at the original audit.

There were some anomalies with regard to the information provided to ASQA (Items 50 – 54 and 56 which

were logged in the Continuous Improvement Register but which had not been reviewed at the January meeting). However these anomalies were clarified by the Lead Auditor in a discussion with Micala Jacobs, Administration Manager on 28 March 2013.

The RTO had demonstrated compliance with this Standard.

SNR17.4 The NVR registered training organisation manages records to ensure their accuracy and integrity

At the original audit the RTO was not compliant with this Standard.

- A review of student files found that they were incomplete and/or not maintained accurately (e.g. the training plan issued to Rubearn Lee (Item 55) had not been signed by the student. A training plan was not on file for Grazia Gioffre (Item 32). An enrolment form was not on file for Zach Gibson (Item 38)).
- The 'New Student Setup Checklist' which is used to ensure that all relevant items are held on file for each student and/or actions taken to complete the enrolment of students were incomplete for the students whose files were reviewed (Grazia Gioffre (Item 32); Christine Farrugia; Tracie Kircher; Tenille Cann (Item 36); Zach Gibson (Item 38); Wilma Chandre (Item 39); Johanne Foster (Item 40); Rubearn Lee (Item 55)).
- The RTO's policies and procedures for managing client records and recordkeeping were not fit for purpose. Training and Assessment Strategies were inaccurate (e.g. HLT50307 Diploma of Remedial Massage packaging was incorrect and the narrative regarding trainer qualifications was inaccurate); evidence was not collected nor were direct supervision arrangements put in place to ensure NSSC requirements were met); and AQF policies had not been implemented in relation to testamurs, statements of attainment and the certificate register.

The RTO was required to review, revise, document and fully implement its processes for managing its records to ensure that they are fit for purpose and are capable of maintaining the accuracy and integrity of the relevant records.

The RTO submitted evidence which included:

- A copy of its Records Management policy and procedure
- An updated New Student Setup Checklist
- File audit schedule/calendar (use to check off the student file against the New Student Setup Checklist)
- Training Plan Grazia Gioffre
- Enrolment Form Zach Gibson

It was noted that the Records Management policy and procedure was the same version that was sighted at the original audit.

It was also noted that following further review that the New Student Setup Checklist for Grazia Gioffre had been completed at the time of the original audit but that the method used was inappropriate; ticks were inserted for dates

Finding as at 13 February 2013

The review of the rectification evidence found that the RTO was now compliant with this Standard.

SNR18.1 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

At the original audit the RTO's CEO was not compliant with this Standard.

The CEO had not ensure that the RTO was compliant with the requirements of the VET Quality Framework including the Australian Qualifications Framework, SNRs 15, 16, 17, 20, 22, 23 and 24.

The CEO was required to undertake the necessary action/s to ensure that the RTO can demonstrate compliance with the VET Quality Framework.

The RTO submitted evidence which indicated that compliance had been demonstrated.

Finding as at 13 February 2013

Non-compliance remained in relation to SNR's 15, 16, 17 and 24. These non-compliance were of a minor nature and it is clear from the evidence presented that the CEO had made a significant effort in have the more critical matters rectified.

The RTO's CEO had complied sufficiently to demonstrate that the requirements of this Standard had been met.

SNR20.1 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.

At the original audit the RTO was not compliant with this Standard.

The RTO was in breach of NVR Act 2011 s 22 *Condition – compliance with the VET Quality Framework*.

The RTO was required to review all legislation and regulations applicable to its operations and take necessary action to ensure compliance with that legislation and regulations.

The RTO submitted evidence which concluded that compliance had been demonstrated.

Finding as at 13 February 2013

Non-compliance remained in relation to SNR's 15, 16, 17 and 24. These non-compliance were of a minor nature and it would be harsh to conclude that the RTO was in breach of NVR Act 2011 s 22 *Condition – compliance with the VET Quality Framework*.

The RTO had submitted sufficient evidence to demonstrate compliance with this Standard.

SNR22.2 The NVR registered training organisation must provide the following fee information to each client:

- the total amount of all fees including course fees, administration fees, materials fees and any other charges
- payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee
- 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
- 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
- the organisation's refund policy.

At the original audit the RTO was not compliant with this Standard.

The Enrolment Forms (Items 8 and 47) did not include information regarding any other charges that may be incurred by the student. It was noted that a range of other fees were identified in the Student Pre-enrolment Information Handbook 2012 (Item 10) however this information is provided to prospective students/client rather than to clients as required by the Standard.

The RTO was required to review and revise its enrolment documentation to ensure that students who enter into agreements with the RTO are fully informed of the fees and charges for which they are and/or may become liable.

The RTO submitted evidence which included advice that the RTO had modified its enrolment form to include a declaration by the student stating that they had been fully informed of the fees and charges/potential fees and charges via the Student Enrolment Information Handbook. The Student Enrolment Information Handbook was distributed to prospective students.

Finding as at 13 February 2013

The RTO was compliant with this Standard.

SNR23.1 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 accredited course, a qualification or statement of attainment (as appropriate) that:

- meets the Australian Qualifications Framework (AQF) requirements
- identifies the NVR registered training organisation by its national provider number from the National Register
- includes the NRT logo in accordance with its current conditions of use.

At the original audit the RTO was not compliant with this Standard.

The statements describing the RTO's testamur and statement of attainment templates (Items 12 and 13) were not those required by the AQF Qualifications Issuance Policy.

The Statement of Attainment template contained a misleading statement, *that the competencies were attained in completion of a qualification*, which is contrary to the AQF Qualifications Issuance Policy which requires that these documents are to be in a form that ensures that it cannot be mistaken for a testamur and that they are only issued when a student does not complete a whole AQF qualification

The RTO was required to review and revise the documentation issued to graduates and/or students to ensure that it complies with the requirements of the Australian Qualifications Framework.

The RTO submitted evidence which included:

- Testamur template
- Record of results template
- Statement of Attainment

Finding as at 13 February 2013

The RTO was compliant with this Standard.

SNR24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

At the original audit the RTO was not compliant with this Standard.

The Pre-training Review (p2, Item 9) made reference to 'correspondence students.' This reference, interpreted as students undertaking their course by correspondence, is potentially misleading as the RTO's delivery and assessment strategies (Item 2) and marketing materials showed that the RTO did not offer a training program which included correspondence learning and/or assessment.

The RTO's website provided prospective students with information which was inaccurate, unclear and/or misleading. For example:

- The website included an FAQ link. One of the questions and associated response was:
Is MIMT a registered Training Authority?
Yes – we are registered with the Victorian Registration and Qualifications Authority and the Australian National Training Authority as a Registered Training Organisation.
The response provided was inaccurate. The RTO is not a registered training authority and nor is it registered with the VRQA or ANTA.
- Under the heading Study Modes for the HLT50307 Diploma of Remedial Massage reference was made to the Certificate IV in Massage Therapy Practice a course duration was also shown. It was not clear whether the course duration referred to was for the Certificate IV or the Diploma.
- The website information for the HLT50307 Diploma of Remedial Massage was misleading. The website information included information regarding work experience opportunities being made available to students in a range of environments. However at the opening meeting the RTO stated that there was no work-based training undertaken as part of its program.

Information available to prospective students was inconsistent. The RTO's website indicated that the full-time duration for the HLT50307 Diploma of Remedial Massage was 5 months whereas the course brochures stated

that the full-time course duration was 5-6 months.

Information provided to prospective students regarding the Certificates III and IV in Fitness was incomplete. The RTO website included a statement indicating that the SIS30310 Certificate III in Fitness and SIS40210 Certificate IV in Fitness were available but provided no advice regarding the content/s of those qualifications. The course brochures did not include information regarding course structure, content or entry criteria. Therefore, it is unclear as to how prospective students obtain information regarding these qualifications.

The RTO was required to review and revise all of its marketing materials (including the website and course brochures to ensure that the information available for prospective students is accurate, complete, clear and not misleading.

The RTO submitted evidence which included:

- Pre-training Review booklet
- Downloads of Website pages
- Brochures for SIS30310 Certificate III in Fitness (Exercise Instructor) and SIS40210 Certificate IV in Fitness (Personal Trainer)

Finding as at 28 March 2013

The online version of the course brochure for SIS30310 Certificate III in Fitness and SIS40210 Certificate IV in Fitness has used the NRT logo inappropriately. Whilst the logo is used with information advertising nationally recognised training programs it is included under the heading Registration which is not correct. This infraction was considered to be minor.

On 28 March 2013 Micala Jacobs, Administration Manager gave an undertaking to the Lead Auditor to adjust the positioning of the NRT logo on the online version of the course brochure for SIS30310 Certificate III in Fitness and SIS40210 Certificate IV in Fitness.

All other rectifications had been undertaken appropriately.

The RTO was compliant with this Standard.

SNR25.2 The NVR registered training organisation must manage the transition from superseded accredited courses so that it delivers only currently endorsed training packages or currently accredited courses.

At the original audit the RTO had not correctly managed the transition from superseded accredited courses to ensure that was delivering a currently endorsed course. The RTO's HLT40307 Certificate IV in Massage Therapy Practice inappropriately included units imported from the new HLT40312 Certificate IV in Massage Therapy Practice.

The RTO was required to review and revise the implementation of its transition arrangements to ensure that those arrangements are correctly applied.

The RTO submitted evidence which demonstrated that transition arrangements (i.e. training and Assessment Strategies submitted for SNR15.2) were being implemented in accordance with training package requirements and the requirements of this Standard.

Finding as at 13 February 2013

The RTO was compliant with this Standard.

Rectification requirements – evidence of rectification to be submitted within 20 working days

Australian Qualifications Framework

The RTO is required to review and revise its certificate register to ensure that it complies with AQF requirements.

SNR15.1 The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.

The RTO is to review, revise and fully implement its continuous improvement processes to ensure that it collects, analyses and acts upon data to improve the quality of training and assessment.

SNR 15.2 Strategies for training and assessment used by the meet the requirements of the relevant training package or accredited course and have been developed through effective consultation with industry

The RTO is required to:

- Develop and fully implement processes to undertake effective consultation with industry in the development of each of its training and assessment strategies
- Review and revise all of its training and assessment strategies to ensure that they meet Training Package requirements
- Review and revise all of its training and assessment strategies to ensure that they include sufficient information to enable that trainers and assessors to identify and locate the resources, facilities and equipment required to undertake delivery and assessment.
- Review and revise all of its training and assessment strategies to ensure that the information provided is complete and accurate.
- Review and revise all of its training and assessment strategies to ensure that trainers and assessors are provided with guidance regarding:
 - the implementation of reasonable adjustment
 - clustered delivery
 - holistic assessment
 - recording and processing assessment outcomes
 - providing feedback to the student.
- Review and revise all of its training and assessment strategies to ensure that the delivery and assessment methodologies are those that are actually being implemented.

SNR 15.3 Staff, facilities, equipment, training and assessment materials;

The RTO is required to:

- Review and revise its staffing arrangements to ensure that the NSSC guidelines for all trainers and assessors are adhered to.
- Review and revise all of the assessment tools for all of the units of competency covered by its scope of registration to ensure that Training Package requirements are met.
- Develop and fully implement processes to ensure that work-based training sites meet Training package requirements.

SNR 15.4 Trainers and assessors

Staff, trainers/assessors

The RTO is required to:

Review, revise and fully implement its employment arrangements as they apply to all trainers and assessors to ensure that NSSC guidelines are being met.

SNR 15.5 Assessment

The RTO is required to:

<ul style="list-style-type: none"> • Review and revise all assessment tools for all units of competency covered by its scope of registration to ensure that: <ul style="list-style-type: none"> ○ assessors are provided with clear instructions regarding the required standards of performance for each assessment task/activity ○ the principles of assessment and rules of evidence have been implemented ○ all Training Package requirements have been addressed. • Develop and fully implement a process or processes to enable the systematic validation of assessment. <p>i.</p>
<p>SNR16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data</p> <p>The RTO is to develop and fully implement its continuous improvement processes to ensure that it collects, analyses and acts upon data to improve its client services.</p>
<p>SNR16.3 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.</p> <p>The RTO is to review and revise the information provided to students prior to their enrolment to ensure that it is consistent and accurate.</p>
<p>SNR16.6 Learners have timely access to current and accurate records of their participation and progress</p> <p>The RTO is to develop, document and distribute information to ensure that enrolled students are provided with the information to enable them to access records about their participation and progress on a timely basis.</p>
<p>SNR16.7 The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively</p> <ol style="list-style-type: none"> 1. The RTO is required to distribute the revised information regarding complaints and appeals to all of its students to ensure that they are fully informed about the complaints and appeals processes available to them and that they are able to access those processes in a timely manner.
<p>SNR17.1 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.</p> <p>The RTO is to review and, if necessary, revise and fully implement its processes to ensure that students were receiving the services outlined in their agreements with the RTO.</p>
<p>SNR17.2 The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations</p> <p>The RTO is to review, revise and fully implement its processes for continuous improvement to systematically ensure that the actions identified to improve its operations have been undertaken.</p>
<p>SNR17.4 The NVR registered training organisation manages records to ensure their accuracy and integrity</p> <p>The RTO is required to review, revise, document and fully implement its processes for managing its records to ensure that they are fit for purpose and are capable of maintaining the accuracy and integrity of the relevant records.</p>
<p>SNR18.1 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</p> <p>The CEO is to undertake the necessary action/s to ensure that the RTO can demonstrate compliance with the VET Quality Framework.</p>
<p>SNR20.1 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.</p> <p>The RTO is to review all legislation and regulations applicable to its operations and take necessary action to</p>

ensure compliance with that legislation and regulations.

SNR22.2 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
- (e) the organisation's refund policy.

The RTO is to review and revise its enrolment documentation to ensure that students who enter into agreements with the RTO are fully informed of the fees and charges for which they are and/or may become liable.

SNR23.1 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 accredited course, a qualification or 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
- c) includes the NRT logo in accordance with its current conditions of use.

The RTO is to review and revise the documentation issued to graduates and/or students to ensure that it complies with the requirements of the Australian Qualifications Framework.

SNR24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.

The RTO is required to review and revise all of its marketing materials (including the website and course brochures) to ensure that the information available for prospective students is accurate, complete, clear and not misleading.

SNR25.2 The NVR registered training organisation must manage the transition from superseded accredited courses so that it delivers only currently endorsed training packages or currently accredited courses.

The RTO is required to review and revise the implementation of its transition arrangements to ensure that those arrangements are correctly applied.