



## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	CSTC Pty Ltd
Trading name/s	Construction Skills Training Centre
RTO number	0699
CRICOS number	n/a

#### AUDIT TEAM

Lead auditor	Melanie Hulme
Auditor/s	Sandra Romyn
Technical adviser/s	n/a

#### AUDIT DETAILS

Application number/s	n/a	
Audit number/s	1005276	
Audit reason 1	Compliance - monitoring	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Other	
Address of site/s visited	n/a	
Date/s of audit	13/03/2014	
Organisation's contact for audit	Mr Peter Roebig peterr@cstc.org.au	Managing Director (07) 3373 8888
NVR standards audited	Selected Standards for Continuing Registration: 15.2, 15.3, 15.4, 15.5, 18.1 and 24.1	

#### BACKGROUND

A review of the following units of competency for the removal of asbestos is being conducted by the Australian Skills Quality Authority (ASQA):

- *CPCCE3014A Remove non-friable asbestos*
- *CPCCE3015A Remove friable asbestos*

The purpose of the review is to focus on the delivery and assessment of these units to ensure they comply with the training package requirements and the VET Quality Framework.

CSTC has been identified as delivering *CPCCE3014A Remove non-friable asbestos* and *CPCCE3015A Remove friable asbestos* in all states and territories.



AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
CPCCE3014A	Remove non-friable asbestos	Face to Face	
CPCCE3015A	Remove friable asbestos	Face to Face	

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

### ORIGINAL AUDIT FINDING AT TIME OF AUDIT

#### Audit finding as at 13/03/2014: Critical non-compliance

- The level of non-compliance considers the potential for an adverse impact on the quality of training and assessment outcomes for students.
- If non-compliance has been identified, this audit report describes evidence of the non-compliance.
- Refer to notification of non-compliance for information on providing further evidence of compliance.

### AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

#### Audit finding following analysis of additional evidence provided on 16/04/2014: Compliant

### AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	Compliant
SNR 16	Not audited	n/a
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 compliant	Compliant
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:** Not audited

**Following rectification:** n/a

**15.2 Strategies for training and assessment meet the requirements of the relevant Training Package or VET accredited course and have been developed through effective consultation with industry.**

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The RTO provided a Training and Assessment Strategy that included the following three units of competency:
  - *CPCCE3014A Remove non-friable asbestos*
  - *CPCCE3015A Remove friable asbestos*
  - *CPCBC4051A Supervise asbestos removal*
- The Training and Assessment Strategy does not meet all the Training Package requirements. For example, the Training Package requires that assessors have 'relevant industry experience, that is, workplace experience within the last two years in the competency area being delivered.' However, in the Human Resource Requirements of CSTC's Training and Assessment Strategy these specific Training Package requirements are not identified and addressed.

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

- Provide an amended Training and Assessment Strategy that satisfies all the requirements of the Training Package.

*Analysis of rectification evidence:*

- The RTO submitted an amended Training and Assessment Strategy that satisfies all the requirements of the Training Package.

**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 provided the following evidence for the unit of competency *CPCCE3014A Remove non-friable asbestos*:
  - Learning resources
  - Lesson Plan
  - *CPCCE3014A Remove Non-Friable Asbestos Assessment Mapping Guide*
  - Competency Exam for *CCPCDE3014A – Remove Non-Friable Asbestos* (theory assessment)
  - Assessment Task Sheet for *CCPCDE3014A – Remove Non-Friable Asbestos* (2 practical assessments)



- The RTO provided the following evidence for the unit of competency *CPCCE3015A Remove friable asbestos*:
  - Learning resources
  - Lesson Plan
  - CPCCE3015A Remove Friable Asbestos Assessment Mapping Guide
  - Competency Exam Part 1 and Part 2 for CCPCDE3015A – Remove Friable Asbestos (theory assessment)
  - Assessment Task Sheet for CCPCDE3015A – Remove Friable Asbestos (2 practical assessments)
  - Student Assessment Workbook
- The learning resources provided were comprehensive and meet Training Package requirements.
- The RTO's assessment instruments do not meet all Training Package requirements. For example:
  - Theory assessments do not address all the required knowledge in sufficient depth as outlined in the units of competency.
    - *CPCCE3014A Remove non friable asbestos*: Such as (but not limited to) job safety analysis (JSA) and safe work method statements (SWMS) if required for construction and risk assessment processes and contingency planning relating to the removal of non-friable asbestos.
    - *CPCCE3015A Remove friable asbestos*: Such as (but not limited to) health hazards associated with friable ACM, hazards associated with using enclosures and removing friable asbestos, job safety analysis (JSA) and safe work method statements (SWMS) if required for construction, safety data sheets (SDS), risk assessment processes and contingency planning relating to the removal of friable asbestos and use of certified WHS management system and emergency plan.
  - The practical assessments do not provide enough detail about the simulated environment to enable the demonstration of competency for the student. The Training Package states for both units that 'competency will need to be demonstrated over a period of time reflecting the scope of the role and the practical requirements of the workplace'. The description of the tasks in both units states 'During this practical task the candidate will be required to remove non-friable/friable asbestos (simulated using asbestos free products) from a structure. They do not provide details outlining (but not limited to) what type of structure, if the location of the asbestos is in a confined space, if the structure is residential or part of a PCBU work place.
  - There is no evidence of a requirement to provide supplementary evidence, such as third party reports. The Training Package states for both units that 'all assessment that is part of a structured learning experience must include a combination of direct, indirect and supplementary evidence'.

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

- Provide amended assessment instruments for the units *CPCCE3014A Remove non friable asbestos* and *CPCCE3015A Remove friable asbestos* that meet all the Training Package requirements, principles of assessment and rules of evidence.

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*Analysis of rectification evidence:*

- The RTO provided the following evidence for the unit of competency *CPCCE3014A Remove non-friable asbestos*:
  - Lesson Plan
  - CPCCE3014A Remove Non-Friable Asbestos Assessment Mapping Guide
  - Competency Exam for CCPCDE3014A – Remove Non-Friable Asbestos (theory assessment)
  - Assessment Task Sheet for CCPCDE3014A – Remove Non-Friable Asbestos (4



- practical assessments)
  - Practical Task 1 Job Safety Analysis
  - Asbestos Removal Control Plan 1 & 2
  - Work Method Statement (for training and assessment purposes)
  - Third Party Report
  - Asbestos Practical Buddy Evaluation Form
- *CPCCE3015A*  
*Remove friable asbestos* is only provided through an RPL process which meets the Training Package requirements and is therefore compliant.
  - *CPCCE3014A*  
The Third Party Report and Asbestos Buddy Evaluation were provided as supplementary evidence.

**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:*

- The RTO provided evidence including a resume and supporting documentation for trainer/assessors Steven Keys and Peter Jensen.
- No evidence was provided to show whether both trainer/assessors are delivering and assessing both units of competency.
- Stephen Keys meets all the Training Package requirements to deliver and assess *CPCCE3014A Remove non-friable asbestos* only. However, no evidence was provided to demonstrate he has formal recognition in *CPCCE3015A Remove friable asbestos*.
- No evidence was provided to demonstrate that Peter Jensen holds a Statement of Attainment in either unit of competency. There was not enough evidence to demonstrate he has current industry experience as the most recent example provided was from 2010. The Training Package requires that assessors have 'formal recognition of competency at least to the level being assessed and relevant industry experience, that is, workplace experience within the last two years in the competency area being delivered'.

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

- Provide documentation to confirm which unit(s) of competency each trainer/assessor delivers and assesses.
- Provide copies of Stephen Keys' vocational qualifications for *CPCCE3015A Remove friable asbestos* (if applicable).
- Provide copies of Peter Jensen's relevant vocational qualifications for units of competency delivered.
- Provide evidence that confirms Peter Jensen meets the Training Package requirements for units of competency that he delivers/assesses, specifically 'relevant industry experience, that



is, workplace experience within the last two years in the competency area being delivered.'

*Analysis of rectification evidence:*

- The RTO provided confirmation of which unit of competency each trainer/assessor delivers, copies of Peter Jensen's relevant vocational qualifications for both units of competency as well as sufficient evidence that demonstrates his current industry experience.

**15.5 Assessment including Recognition of Prior Learning (RPL):**  
**(a) meets the requirements of the relevant Training Package or VET accredited course; and**  
**(b) is conducted in accordance with the principles of assessment and the rules of evidence; and**  
**(c) meets workplace and, where relevant, regulatory requirements; and**  
**(d) is systematically validated.**

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The assessments being conducted using such instruments as provided cannot demonstrate that candidates meet training package requirements and therefore the RTO is non-compliant in the conduct of its audits.

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

- Provide evidence to address the non-compliances as detailed under SNR 15.3.

*Analysis of rectification evidence:*

- The amended assessment tools address the non-compliances identified against SNR 15.3 and 15.5.

**SNR 16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients, as follows:**

**16.1 The NVR registered training organisation establishes the needs of clients, and delivers services to meet these needs.**

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

**16.3 Before clients enrol or enter into an agreement, the NVR registered training organisation**



**informs them about the training, assessment and support services to be provided, and about their rights and obligations.**

**Original finding:** Not audited

**Following rectification:** n/a

**16.4 Employers and other parties who contribute to each learner's training and assessment are engaged in the development, delivery and monitoring of training and assessment.**

**Original finding:** Not audited

**Following rectification:** n/a

**16.5 Learners receive training, assessment and support services that meet their individual needs.**

**Original finding:** Not audited

**Following rectification:** n/a

**16.6 Learners have timely access to current and accurate records of their participation and progress.**

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 17 Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates, as follows:**

**17.1 The NVR registered training organisation's management of its operations ensures clients receive the services detailed in their agreement with the NVR registered training organisation.**

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

**17.3 The NVR registered training organisation monitors training and/or assessment services provided on its behalf to ensure that it complies with all aspects of the VET Quality Framework.**

**Original finding:** Not audited

**Following rectification:** n/a

**17.4 The NVR registered training organisation manages records to ensure their accuracy and integrity.**

**Original finding:** Not audited

**Following rectification:** n/a



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

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

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The CEO has not ensured compliance with the VET Quality Framework as non-compliances have been identified against SNR 15.2, 15.3, 15.4, 15.5 and 24.1.

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

- Submit evidence to rectify the non-compliances identified against SNR 15.2, 15.3, 15.4, 15.5 and 24.1

*Analysis of rectification evidence:*

- The RTO provided sufficient evidence to demonstrate compliance for SNR 15.2, 15.3, 15.4, 15.5 and 24.1.

**18.2 The NVR registered training organisation must also explicitly demonstrate how it ensures the decision making of senior management is informed by the experiences of its trainers and assessors.**

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 19 Interactions with the National VET Regulator**

**19.1 The NVR registered training organisation must co-operate with the National VET Regulator:**  
**(a) in the conduct of audits and the monitoring of its operations;**  
**(b) by providing accurate and timely data relevant to measures of its performance;**  
**(c) by providing information about significant changes by its operations;**  
**(d) by providing information about significant changes to its ownership; and**  
**(e) in the retention, archiving, retrieval and transfer of records consistent with National VET Regulator's requirements.**

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 20 Compliance with legislation**

**20.1 The NVR registered training organisation must comply with relevant Commonwealth, State or Territory legislation and regulatory requirements relevant to its operations and its scope**





**of registration.**

**Original finding:** Not audited

**Following rectification:** n/a

**20.2 The NVR registered training organisation must ensure that its staff and clients are fully informed of legislative and regulatory requirements that affect their duties or participation in vocational education and training.**

**Original finding:** Not audited

**Following rectification:** n/a

## **SNR 21 Insurance**

**21.1 The NVR registered training organisation must hold public liability insurance throughout its registration period.**

**Original finding:** Not audited

**Following rectification:** n/a

## **SNR 22 Financial management**

**22.1 The NVR registered training organisation must be able to demonstrate to the National VET Regulator, on request, that it is financially viable at all times during the period of its registration.**

**Original finding:** Not audited

**Following rectification:** n/a

**22.2 The NVR registered training organisation must provide the following fee information to each client:**

- (a) the total amount of all fees including course fees, administration fees, materials fees and any other charges;**
- (b) payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee;**
- (c) the nature of the guarantee given by the NVR registered training organisation to complete the training and/or assessment once the student has commenced study in their chosen qualification or course;**
- (d) the fees and charges for additional services, including such items as issuance of a replacement qualification testamur and the options available to students who are deemed not yet competent on completion of training and assessment; and**
- (e) the organisation's refund policy.**

**Original finding:** Not audited

**Following rectification:** n/a

**22.3 Where the NVR registered training organisation collects student fees in advance it must**



ensure it complies with one of the following acceptable options:

- (a) (Option 1) the NVR registered training organisation is administered by a State, Territory or Commonwealth government agency;
- (b) (Option 2) the NVR registered training organisation holds current membership of an approved Tuition Assurance Scheme;
- (c) (Option 3) the NVR registered training organisation may accept payment of no more than \$1000 from each individual student prior to the commencement of the course. Following course commencement, the NVR registered training organisation may require payment of additional fees in advance from the student but only such that at any given time, the total amount required to be paid which is attributable to tuition or other services yet to be delivered to the student does not exceed \$1,500;
- (d) (Option 4) the NVR registered training organisation holds an unconditional financial guarantee from a bank operating in Australia for no less than the full amount of funds held by the NVR registered training organisation which are prepayments from students (or future students) for tuition to be provided by the NVR registered training organisation to those students; or
- (e) (Option 5) the NVR registered training organisation has alternative fee protection measures of equal rigour approved by the National VET Regulator.

**Original finding:** Not audited

**Following rectification:** n/a

## SNR 23 Certification, issuing and recognition of qualifications & statements of attainment

- 23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:
- (a) meets the Australian Qualifications Framework (AQF) requirements;
  - (b) identifies the NVR registered training organisation by its national provider number from the National Register and
  - (c) includes the NRT logo in accordance with its current conditions of use.

**Original finding:** Not 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 compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The Training and Assessment Strategy does not match the information provided in the marketing materials. For example, the Training and Assessment Strategy provides different information, compared to the marketing on the website, with regards to the duration of the unit of competency *CPCCE3015A Remove friable asbestos*. In the marketing it states the course duration as being three (3) days. In the Training and Assessment Strategy it states two (2) days for the assessment. The other unit of competency *CPCCE3014A Remove non-friable asbestos* is also listed this way with two (2) days formal training and two (2) days assessment when the course is stated as two (2) days.

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

- Provide evidence of marketing material that accurately reflects course training and assessment durations, consistent with the organisation's Training and Assessment Strategy.

*Analysis of rectification evidence:*

- The RTO provided both an amended Training and Assessment Strategy and amended marketing materials that are consistent and demonstrate compliance with SNR 24.1.

**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