



Audit report – VET Quality Framework

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

ORGANISATION DETAILS

Organisation's legal name	Electro Group Training Queensland Limited
Trading name/s	Electro Group Training Queensland Limited
RTO number	30185
CRICOS number	NA

AUDIT TEAM

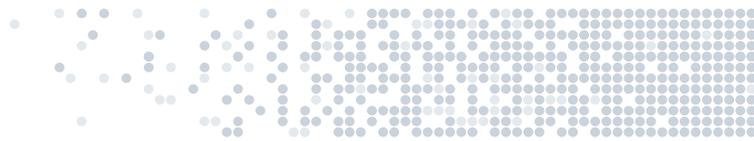
Lead auditor	Anthony Sheppard
Auditor/s	NA
Technical adviser/s	NA

AUDIT DETAILS

Application number/s	1059403	
Audit number/s	1005889	
Audit reason 1	Application - renewal	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	9 Railway Tce, Rocklea Qld 4106	
Date/s of audit	28/05/2014	
Organisation's contact for audit	Patricia Beitz tbeitz@electrogroup.com.au	Executive Manager 32746288
NVR standards audited	All Standards for Continuing Registration	

BACKGROUND

- Electro Group consists of two industry-owned companies, Electro Group Apprenticeships Queensland is the organisation's Group Training arm, while Electro Group Training Queensland Limited is the organisation's Registered Training Organisation. The organisation as a whole is overseen by a board of directors to whom the RTO management are responsible. The key personnel within the organisational structure relevant to the operations of the RTO are Geoff Baldwin as Acting CEO and Patricia Beitz as Executive Manager RTO/Business Compliance.
- The organisation provides non-accredited training for supervisory positions (leading hand, foremen etc.) within the electrical industry.
- Approximately 60% of core clients are through the organisation's group training arm, with the balance



being from small contractors (apprentice and trainee). Core clients for post-trade qualifications are predominantly small to medium contractor enterprises.

- The organisation recently commenced operations from new training locations at 63 Raedon Street, Biloela and 23 Denham St, Rockhampton. The organisation is offering its full scope at each location. It is noted that the new locations are yet to be updated on ASQAnet.
- Note that the unit of competency CPCCOHS1001A Work safely in the construction industry was originally scoped as part of the audit sample; however, the organisation has formally applied for this unit of competency to be removed from its explicit scope of registration. Furthermore, where this unit of competency is included as an elective within qualifications on scope, the organisation states that it outsources delivery and assessment of that unit to Skills Connect. The audit scope was adjusted accordingly and CPCCOHS1001A Work safely in the construction industry removed from the audit sample.
- The organisation's funding sources are User Choice and Fee for service.

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

- 621

AUDIT SAMPLE			
Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
UEE30811	Certificate III in Electrotechnology Electrician	Block release face to face	540
UEE42011	Certificate IV in Electrical Photovoltaic Systems	Face to face	11

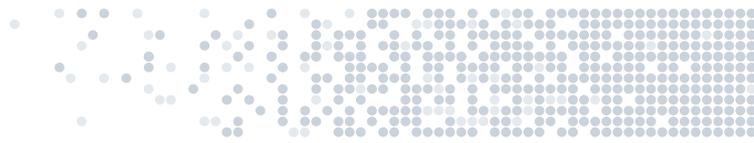
*Apprenticeship, Traineeship, Face to face, Distance, Online, Workplace, Mixed, Other (specify)

INTERVIEWEES		
Name	Position	Qualification/Course/Unit code/s
Geoff Baldwin	A CEO – Director	Nil
Patricia Beitz	Executive Manager/RTO Business Compliance	Nil
Rachael Koplich	Administration Officer	Nil
Brett Bishop	Head Training	UEE30811, UEE42011

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 28/05/2014: 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.

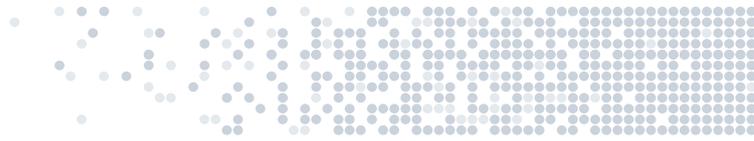


AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on 7/07/2014: Compliant

AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	Compliant
SNR 16	Not compliant	Compliant
SNR 17	Not compliant	Compliant
SNR 18	Not compliant	Compliant
SNR 19	Not audited	n/a
SNR 20	Compliant	n/a
SNR 21	Not audited	n/a
SNR 22	Not compliant	Compliant
SNR 23/AQF	Not compliant	Compliant
SNR 24	Not compliant	Compliant
SNR 25	Compliant	n/a



SNR 15 The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:

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

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that it analyses and acts on relevant data for continuous improvement of training and assessment (SNR 15.1)
- The organisation provided evidence of the collection of relevant data concerning training and assessment; however, it did not demonstrate that this data was analysed or acted on. It was evident that a process for analysing and acting on data relevant to SNR 15.1 had, at some point, been in place; however, no evidence was provided to demonstrate that this process had continued beyond June 2012.

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

- Provide evidence to demonstrate that it analyses and acts on relevant data for continuous improvement of training and assessment.

Analysis of rectification evidence:

- The organisation provided the following documentation identified as rectification against SNR 15.1, 16.2, and 17.2:
 - Copy of its continuous improvement procedure
 - Copy of its internal audit procedure
 - Copy of its internal audit schedule (July 2014 to June 2015 with first scheduled activity planned to take place in August 2014)
- The evidence provided demonstrates existence of procedures for the management of continuous improvement, although this aspect of compliance with SNR 15.1 was not in question. As stated within the reasons for finding of non-compliance above, the non-compliance relates to the organisation's lack of evidence concerning the analysis and acting on relevant data for continuous improvement of training and assessment. As noted within the findings above, there was no evidence to demonstrate that the organisation's continuous improvement process had continued beyond June 2012.
- The evidence presented for rectification does not provide evidence of the analysis and acting on relevant data, only the intent to gather data from August 2014. Therefore, it remains unclear that the organisation analyses and acts on relevant data for continuous improvement of training and assessment (SNR 15.1).
- It is; however, recognised that the organisation has provided a timeframe for implementation i.e. August 2014. Therefore, the organisation is identified compliant with SNR 15.1, with the recommendation that a limited compliance monitoring activity be conducted to confirm implementation of the organisation's documented processes.

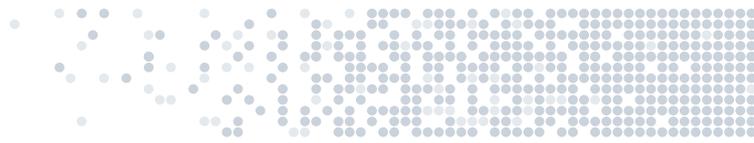
15.2 Strategies for training and assessment meet the requirements of the relevant Training Package or VET accredited course and have been developed through effective consultation with industry.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that its strategies for training and assessment met the requirements of the relevant Training Package (SNR 15.2).



UEE30811 Certificate III in Electrotechnology Electrician

- The organisation's strategy for training and assessment of the above qualification includes the statement that "resources are outlined in the Facilitator's Guide. Appendix 1"; however, the organisation's "Facilitator's Guide" does not contain an appendix 1 or any information concerning the physical resources required for training and assessment. It is unclear from the organisation's strategy, how it ensures that resources meet the requirements of the UEE11 Electrotechnology Training Package.

UEE42011 Certificate IV in Electrotechnology – Photovoltaic Systems

- The organisation's strategy for training and assessment of the above qualification identifies the elective unit of competency HLTCPR201B Perform CPR; however, the endorsed elective for this qualification is HLTAID001 Perform cardiopulmonary resuscitation.
- Page two of the strategy states that there are no eligibility or entry requirements; however, the organisation's marketing materials available on its website make clear that prospective clients for this qualification must hold an electrical licence. Additionally, discussion with Brett Bishop – Head Teacher, on this issue during the site visit confirmed that the entry requirements specified within the organisation's strategy for training and assessment are not correct.
- The strategy identifies that Brett Bishop is the trainer and assessor for CPCCOHS1001A Work safely in the construction industry and HLTCPR201B Perform CPR (HLTAID001 as per note above); however, the organisation outsources training and assessment of both units to Skills Connect. The strategy does not identify the outsourcing of these two units of competency.
- The strategy identifies that for the following units of competency, the organisation's assessment consists only of theory assessment, and not practical:
 - UEENECC001B Maintain documentation
 - UEENECC003B Provide quotations for installation or service jobs
 - UEENECC010B Deliver a service to customers
 - UEENEEG122A Conduct compliance inspection of single phase LV electrical installations
 - UEENEEG123A Conduct compliance inspection of LV electrical installations with demand exceeding 100A per phase
- It is unclear how the organisation could meet the requirements of the UEE11 Electrotechnology Training Package concerning the above units of competency without gathering evidence of practical competency.
- Page six of the strategy includes reference to recognition of prior learning in which the qualification is noted as "electrotechnology electrician" rather than UEE42011 Certificate IV in Electrotechnology – Photovoltaic Systems. It is acknowledged that this is a minor error.
- The organisation's strategy for training and assessment of UEE42011 Certificate IV in Electrotechnology – Photovoltaic Systems includes the statement that "resources are outlined in the Facilitator's Guide. Appendix 1"; however, the organisation's "Facilitator's Guide" does not contain an appendix 1 or any information concerning the physical resources required for training and assessment. It is unclear from the organisation's strategy, how it ensures that resources meet the requirements of the UEE11 Electrotechnology Training Package.

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

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrotechnology – Photovoltaic Systems

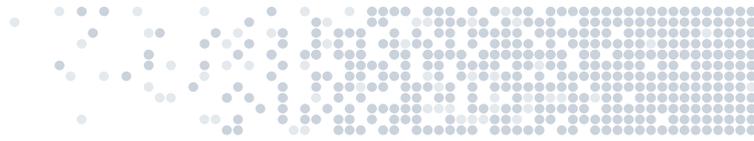
- Provide amended strategies for training and assessment of the above listed qualifications that meet the requirements of the UEE11 Electrotechnology Training Package.

Analysis of rectification evidence:

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrotechnology – Photovoltaic Systems

- The organisation provided amended strategies for training and assessment of the above listed qualifications that satisfactorily demonstrate compliance with SNR 15.2.



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 organisation did not demonstrate that assessment materials used by the organisation are consistent with the requirements of the Training Package (SNR 15.3).

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrical - Photovoltaic Systems

UEENEEG006A Solve problems in single and three phase low voltage machines

UEENEEG105A Verify compliance and functionality of low voltage general electrical installations

- See SNR 15.5 for details of non-compliance. The organisation did not demonstrate that its assessment materials for the above units of competency met the requirements of the UEE11 Electrotechnology Training Package.

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

- The organisation is not required to provide rectification evidence against SNR 15.3. Evidence provided in response to the non-compliances identified at SNR 15.5 will also be used to determine compliance against SNR 15.3.

Analysis of rectification evidence:

- The organisation provided satisfactory evidence of compliance against SNR 15.5; therefore, it has also demonstrated compliance concerning its assessment materials regarding SNR 15.3.

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: Compliant

Following rectification: n/a

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.

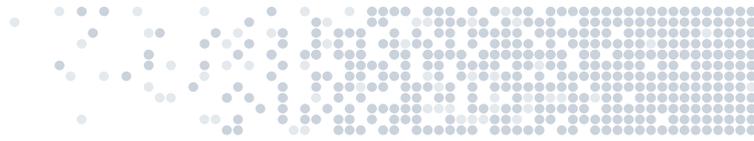
Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrical - Photovoltaic Systems



UEENEEG006A Solve problems in single and three phase low voltage machines

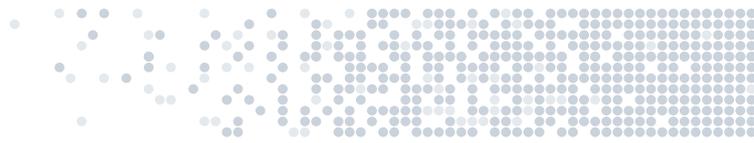
Assessment materials consist of:

- Two theory assessments
- Assessment processes do not meet the requirements of the UEE11 Electrotechnology Training Package (SNR 15.5a). They also do not meet the principles of assessment or the rules of evidence (SNR 15.5b).
- The organisation did not provide evidence to support that it assesses learners' practical skills. The organisation states that it had developed a practical assessment for the above unit of competency approximately two years ago; however, it was unable to locate that assessment tool. It is noted that a review of learner records identified that learners were either not assessed for their practical skill relevant to the unit of competency requirements or that assessors had substituted the missing assessment tool with one of their own choosing. It was unclear how long this practice had endured. It was unclear how the organisation ensured fairness, sufficiency, reliability, and validity of the assessment under such circumstances.
- In the absence of a practical assessment tool, the organisation was unable to demonstrate how its assessment materials combined to gather sufficient, valid, and reliable evidence of learner competency.

UEENEEG105A Verify compliance and functionality of low voltage general electrical installations

Assessment materials consist of:

- Three theory and three practical assessments.
- Assessment processes do not meet the requirements of the UEE11 Electrotechnology Training Package (SNR 15.5a). They also do not meet the principles of assessment or the rules of evidence (SNR 15.5b).
- The organisation did not demonstrate that its assessment addressed all aspects of the unit of competency, such as (though not limited to):
 - Power dissipation in single-source multiple-path d.c. circuits.
 - Safely measuring the parameters for the whole or any part of single-source multiple-path d.c. circuits.
 - Relationship between the phase voltages generated in a three-phase alternator and the conventions for identifying each in regard to alternating voltage and current generation, phase relationships, and energy in an a.c. circuit.
- As the assessment materials did not fully address all requirements of the unit of competency, the organisation had not ensured that assessment was conducted in accordance with the rules of evidence, in particular, concerning sufficiency of assessment evidence.
- The organisation's practical assessments did not provide sufficient detail to either the assessor or learner to ensure reliability, validity and fairness of the assessment. In most cases, the practical assessments rely on the individual assessor to provide a scenario at the time of assessment against which the learner must demonstrate competency. Furthermore, these assessments do not include criteria defining acceptable performance; therefore, it is unclear how the organisation ensures the consistency, and thus the reliability and validity, of assessors' competency decisions.
- Theory assessments routinely include pass marks for each question with an arbitrary percentile grading allocated to denote overall satisfactory performance. In several examples sighted, learners were assessed as satisfactory based on part marks allocated for mathematical questions regardless of the learner failing to provide the correct result. It is unclear how a learner could be considered competent when they have not demonstrated the ability to correctly calculate maximum demand for example. It is acknowledged that there may be a number of methods to calculate various electrical requirements; however, if the learner, regardless of method used, fails to provide the correct response, it is difficult to see how they could have demonstrated competency.
- Additionally, it was unclear how the organisation ensured that it had gathered sufficient evidence of competency through the use of the marks allocation and percentile grading system used. It was easily conceivable that a learner could fail to demonstrate competency in any number of skills and knowledge areas, yet achieve the arbitrary pass mark to be deemed competent.



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

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrical - Photovoltaic Systems

UEENEEG006A Solve problems in single and three phase low voltage machines

UEENEEG105A Verify compliance and functionality of low voltage general electrical installations

- Provide a complete set of assessment materials for each of the above units of competency that meets the principles of assessment and the rules of evidence and all the requirements of the relevant unit of competency.
- The assessment materials must include, or be accompanied by, guidance to assessors to enable them to make consistent judgements about competence and information to students about the assessment requirements.

Analysis of rectification evidence:

UEE30811 Certificate III in Electrotechnology Electrician

UEE42011 Certificate IV in Electrical - Photovoltaic Systems

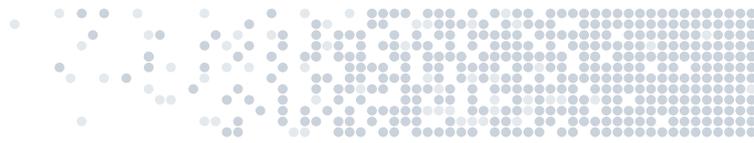
UEENEEG006A Solve problems in single and three phase low voltage machines

- The organisation provided the following amended assessment materials:
 - Session plan
 - Wk1 Theory 1 procedure
 - Wk1 Theory 1
 - Wk1 Theory 2
 - Wk2 Theory 1 Demonstration
 - Wk2 Theory 1
 - Wk2 Theory 2
 - Week 1 and 2 Practical procedure
 - Week 1 and 2 Practical assessment
- It is noted that two errors exist. Week 1 theory one assessment instructions state that time allowed is “ninety (20) minutes”, while Week 2 theory 2 assessment does not include a guide answer for question nine. These are acknowledged as very minor oversights and the organisation is encouraged to take corrective action as appropriate.
- The organisation satisfactorily demonstrated compliance concerning the above unit of competency.

UEENEEG105A Verify compliance and functionality of low voltage general electrical installations

- The organisation provided the following amended assessment materials:
 - Session plan
 - T1A Safety and Compliance Marking Guide
 - T2A Circuit Design Marking Guide
 - T3A Circuit Protection Marking Guide
 - T4A General Electrical Knowledge Marking Guide
 - P1A Isolation RCD and fault current Marking Guide
 - P2A Installation Verification Marking Guide
 - P3A Electrical Installation Marking Guide
- The organisation satisfactorily demonstrated compliance concerning the above unit of competency.

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: Compliant

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 compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that it continuously improves client services by analysing and acting on relevant data (SNR 16.2).
- The organisation provided evidence to demonstrate that it collects relevant data concerning client services; however, it did not demonstrate that this data was analysed or acted on. It was evident that a process for analysing and acting on data relevant to SNR 16.2 had, at some point, been in place; however, no evidence was provided to demonstrate that this process had continued beyond June 2012.

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

- Provide evidence to demonstrate that it continuously improves client services by analysing and acting on relevant data.

Analysis of rectification evidence:

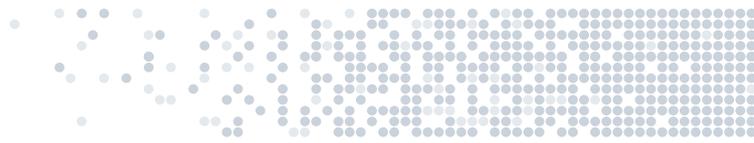
- The organisation provided the following documentation identified as rectification against SNR 15.1, 16.2, and 17.2:
 - Copy of its continuous improvement procedure
 - Copy of its internal audit procedure
 - Copy of its internal audit schedule (July 2014 to June 2015 with first scheduled activity planned to take place in August 2014)
- The evidence provided demonstrates existence of procedures for the management of continuous improvement, although this aspect of compliance with SNR 16.2 was not in question. As stated within the reasons for finding of non-compliance above, the non-compliance relates to the organisation's lack of evidence concerning the analysis and acting on relevant data for continuous improvement of client services. As noted within the findings above, there was no evidence to demonstrate that the organisation's continuous improvement process had continued beyond June 2012.
- The evidence presented for rectification does not provide evidence of the analysis and acting on relevant data, only the intent to gather data from August 2014. Therefore, it remains unclear that the organisation analyses and acts on relevant data for continuous improvement of client services (SNR 16.2).
- It is, however, recognised that the organisation has provided a timeframe for implementation i.e. August 2014. Therefore, the organisation is identified compliant with SNR 16.2, with the recommendation that a limited compliance monitoring activity be conducted to confirm implementation of the organisation's documented processes.

16.3 Before clients enrol or enter into an agreement, the NVR registered training organisation informs them about the training, assessment and support services to be provided, and about their rights and obligations.

Original finding: Compliant

Following rectification: n/a

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



Original finding: Compliant

Following rectification: n/a

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

Original finding: Compliant

Following rectification: n/a

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

Original finding: Compliant

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: Compliant

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: Compliant

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 compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

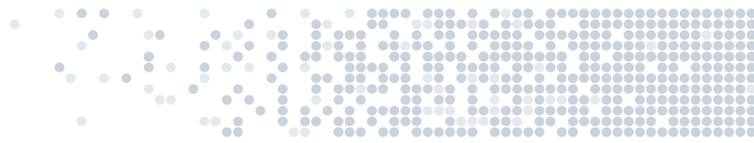
- The organisation did not demonstrate that it uses a systematic and continuous improvement approach to the management of operations (SNR 17.2).
- Documented procedures exist for continuous improvement; however, there is no ongoing evidence of implementation. Aspects of the organisation's continuous improvement approach are evident in the period prior to June 2012; however, there is no evidence post June 2012 for a continuous improvement approach to the organisation's management of operations.

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

- Provide evidence to demonstrate that it uses a systematic and continuous improvement approach to the management of operations.
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Analysis of rectification evidence:

- The organisation provided the following documentation identified as rectification against SNR 15.1, 16.2, and 17.2:
 - Copy of its continuous improvement procedure
 - Copy of its internal audit procedure
 - Copy of its internal audit schedule (July 2014 to June 2015 with first scheduled activity planned to take place in August 2014)
- The evidence provided demonstrates existence of procedures for the management of continuous improvement, although this aspect of compliance with SNR 17.2 was not in



question. As stated within the reasons for finding of non-compliance above, the non-compliance relates to the organisation's lack of evidence concerning the analysis and acting on relevant data for continuous improvement of client services. As noted within the findings above, there was no evidence to demonstrate that the organisation's continuous improvement process had continued beyond June 2012.

- The evidence presented for rectification does not provide evidence of continuous improvement activities, only the intent to implement such activities from August 2014. Therefore, it remains unclear that the organisation has moved beyond the position identified at audit i.e. a procedure exists; however, evidence of implementation is not evident.
- It is; however, recognised that the organisation has provided a timeframe for implementation i.e. August 2014. Therefore, the organisation is identified compliant with SNR 17.2, with the recommendation that a limited compliance monitoring activity be conducted to confirm implementation of the organisation's documented processes.

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 compliant

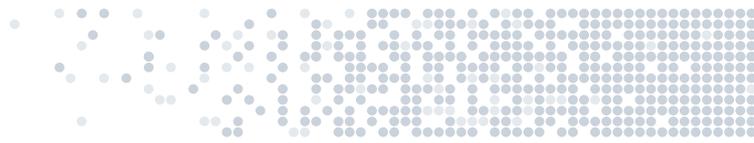
Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that it manages records to ensure their accuracy and integrity (SNR 17.4).
- A review of the organisation's assessment records identified that at some point, the organisation's practical assessment for *UEENEEG006A Solve problems in single and three phase low voltage machines*, had ceased to be used. In reviewing this unit of competency for compliance with SNR 15.5, the organisation advised that it had misplaced its practical assessment, possibly as long as two years ago, and could not provide more than its theory assessments for audit.
- Some learner records for learners that had been assessed as competent for UEENEEG006A did not support that the learner had been assessed for their practical skill. Other learner files demonstrated that assessors had developed their own practical assessment in the absence of the "misplaced" practical assessment.
- The misplacement of the organisation's practical assessment suggests that it does not manage records to ensure their accuracy and integrity.
- That the organisation had not noticed that some of its assessors had subsequently commenced using their own practical assessment, or that others had simply ceased assessing practical skills for UEENEEG006A, further suggests that the organisation does not manage records to ensure their accuracy and integrity.
- It is noted that, as the organisation could not locate its master copy of that assessment, it is possible that the organisation may not be fully meeting its contractual obligations, relevant to its operating context, for management and retention of User Choice records. This is not reported as part of the organisation's non-compliance against SNR 17.4, nor is it presented as an opportunity for improvement; however, is included for completeness of reporting.

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

- Provide evidence to demonstrate that it manages records to ensure their accuracy and integrity.



Analysis of rectification evidence:

- The organisation provided a copy of its records management procedure as evidence of rectification. While the procedure details the organisation’s approach to ensure that appropriate records will be maintained through the use of its Job Ready records management system, it does not provide evidence to demonstrate how the organisation will ensure the accuracy and integrity of records forming part of that EDRMS.
- The non-compliance discussed above relates, in part, to the lack of a checking mechanism to ensure that records are complete and accurate. For example, the recording of learner competency in the absence of complete and accurate records of assessment is of specific note within the identified non-compliance.
- While the amended records management procedure does detail how records will be stored, it does not include information concerning the check-points and cross-checks to be used to ensure the accuracy and integrity of information within the records management process i.e. the aspect of organisational control that was arguably the primary source of this non-compliance. This said, it is not clear that the implementation of the EDRMS will not provide this level of assurance. Therefore, the organisation is identified as compliant with SNR 17.4, with the strong recommendation that a future compliance monitoring activity be conducted to confirm the implementation and adequacy of this system to ensure the accuracy and integrity of records.

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:

- As the organisation was identified non-compliant with the NVR Standards this indicates that the organisation’s CEO has not ensured that the NVR registered training organisation continues to comply with the VET Quality Framework.

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

- This requirement will be addressed by the organisation submitting evidence of having rectified the other non-compliances identified within this report. No further rectification is required for this element.

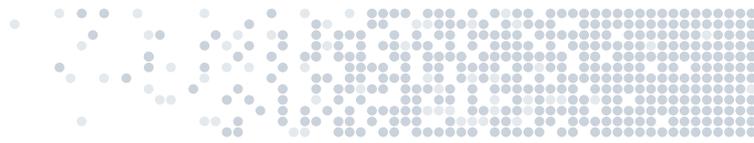
Analysis of rectification evidence:

- The organisation satisfactorily demonstrated compliance relevant to the audit scope.

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

Original finding: Compliant

Following rectification: n/a



SNR 19 Interactions with the National VET Regulator

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

Original finding: Not audited **Following rectification:** n/a

SNR 20 Compliance with legislation

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

Original finding: 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: Compliant **Following rectification:** n/a

SNR 21 Insurance

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

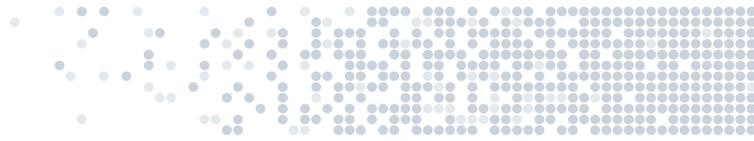
Original finding: Not audited **Following rectification:** n/a

SNR 22 Financial management

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

Original finding: Not audited **Following rectification:** n/a

22.2 The NVR registered training organisation must provide the following fee information to each client:
(a) the total amount of all fees including course fees, administration fees, materials fees and any other charges;
(b) payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee;
(c) the nature of the guarantee given by the NVR registered training organisation to complete the training and/or assessment once the student has commenced study in their



chosen qualification or course;

(d) the fees and charges for additional services, including such items as issuance of a replacement qualification testamur and the options available to students who are deemed not yet competent on completion of training and assessment; and

(e) the organisation's refund policy.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that it provides fee information to each client concerning the options available to students who are deemed not yet competent on completion of training and assessment (SNR 22.2 (d)).

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

- Provide evidence to demonstrate that it provides fee information to each client concerning the options available to students who are deemed not yet competent on completion of training and assessment.

Analysis of rectification evidence:

- The organisation provided amended student handbooks for both apprentices and fee-for-service clients satisfactorily demonstrating compliance with SNR 22.2.

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: Compliant

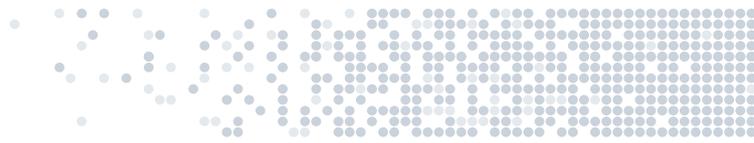
Following rectification: n/a

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

23.1 The NVR registered training organisation must issue to persons whom it has assessed as competent in accordance with the requirements of the Training Package or VET accredited course, a VET qualification or VET statement of attainment (as appropriate) that:

(a) meets the Australian Qualifications Framework (AQF) requirements;

(b) identifies the NVR registered training organisation by its national provider number from the National Register and



(c) includes the NRT logo in accordance with its current conditions of use.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

- The organisation did not demonstrate that it issues to persons whom it has assessed as competent in accordance with the requirements of the Training Package, a VET qualification or VET statement of attainment (as appropriate) that meets the Australian Qualifications Framework (AQF) requirements (SNR 23.1 (a)).
- The organisation’s qualification testamur does not include either the AQF logo or the wording required within section 2.1.5 of the AQF Issuance Policy.
- The organisation’s Statement of Attainment includes the words “These competencies form part of UEE30811 Course in Certificate III in Electrotechnology Electrician”; however, the words “Course in” relate to VET accredited courses only and are not relevant to Training Package qualifications.

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

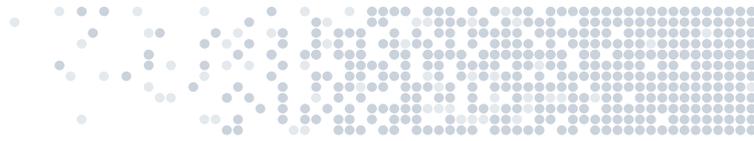
- Provide evidence to demonstrate that it issues to persons whom it has assessed as competent in accordance with the requirements of the Training Package, a VET qualification or VET statement of attainment (as appropriate) that meets the Australian Qualifications Framework (AQF) requirements (SNR 23.1 (a)).

Analysis of rectification evidence:

- The organisation provided an amended testamur and Statement of Attainment that satisfactorily demonstrate compliance with SNR 23.1.

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 organisation did not demonstrate that it ensures its marketing and advertising of AQF and VET qualifications to prospective clients is accurate and consistent with its scope of registration (SNR 24.1).
- The organisation's advertising of UEE42011 Certificate IV in Electrical – Photovoltaic Systems via its web-link <https://www.electrogroup.com.au/uploads/UEE42011%20Certificate%20IV%20in%20Electrical%20Photovoltaic%20Systems%20-%20Master%20Electricians.pdf> however, the hyperlinked course information and student policies provided within the marketing material links to Skills Connect information and policies, and not those of Electro Group Training Queensland Limited. The organisation's clients; however, will be bound by Electro Group's policies, and not those of Skills Connect provided within the marketing. Therefore, the marketing material is not accurate.
- It is noted that the organisation continues to advertise via its webpage <https://www.electrogroup.com.au/short-courses-post-trades.php> for the units of competency CPCCOHS1001A Work safely in the construction industry and UEENEEF102A Install and maintain cabling for multiple access to telecommunication services; however, the organisation's application for renewal of registration requests the removal of these units of competency from the organisation's scope of registration.

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

- Provide evidence to demonstrate that it ensures its marketing and advertising of AQF and VET qualifications to prospective clients is accurate and consistent with its scope of registration. The organisation's website will be reviewed for compliance with SNR 24.1 at a time after the due date for submission of rectification evidence.

Analysis of rectification evidence:

- A review of the organisation's website 17 July 2014 satisfactorily demonstrated 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: Compliant

Following rectification: n/a

25.2 The NVR registered training organisation must manage the transition from superseded VET accredited courses so that it delivers only currently endorsed Training Packages or currently VET accredited courses.

Original finding: Not audited

Following rectification: n/a