Australian Government

Australian Skills Quality Authority

Audit report – VET Quality Framework
Continuing registration as a national VET regulator
(NVR) registered training organisation

ORGANISATION DETAILS

Organisation's legal name	**Australian College of Commerce and Management Pty Ltd**
Trading name/s	Australian College of Commerce and Management Pty Ltd
RTO number	1441
CRICOS number	n/a

AUDIT TEAM

Lead auditor	Judy Duffy
Auditor/s	n/a
Technical adviser/s	n/a

AUDIT DETAILS

Application number/s	1039906	
Audit number/s	1004569	
Audit reason 1	Application - change	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	Level 1, 90 Market Street WOLLONGONG, NSW 2500	
Date/s of audit	21/01/2014	
Organisation's contact for audit	Lisa jones ljones@austcollege.com.au	Managing Director (02) 4225 9881
NVR standards audited	Selected Standards for Continuing Registration: SNRs 15.2, 15.3, 15.4, 15.5, 16.3, 16.4, 17.3, 23.1	

BACKGROUND

The Australian College of Commerce and Management Pty Ltd (ACCM) is a registered training organisation with renewal of registration due in January 2016. The organisation provides funded and user pay training delivery and assessment services in qualifications from BSB, FNS, ICA and TAE Training Packages and has national recognition in all states and territories.

ACCM is owned by James Moran (Director) and Lisa Jones (Director) and employs a staff of 34 full-time personnel which includes the Student Adviser team, the Administration team, the Information Systems

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 1 of 14

team and the Business Development team. The staff work from an office in Wollongong and Surry Hills.

ACCM is applying for a change of scope of registration of 17 qualifications from the BSB, CHC, FNS and SIT Training Packages with national recognition in all states and territories. Of the qualifications sampled at audit the BSB50613 Diploma of Human Resources is the only qualification that supersedes a qualification previously on the RTO's scope.

The predominant delivery mode is correspondence with learning and assessment materials accessed and uploaded online. Under a written Client Services Agreement ACCM will also offer face-to-face workplace training, coaching and assessment. Students have access to a Student Adviser by phone, email and Skype during business hours.

ACCM also offers non-accredited training in areas related to ASIC legislation and the Financial Industry's CPD requirements.

Total number of current enrolments in RTO as at audit date:
- 2,281

AUDIT SAMPLE

Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
BSB30712	Certificate III in Work Health and Safety	Distance	n/a
BSB41513	Certificate IV in Project Management Practice	Distance	n/a
BSB50613	Diploma of Human Resources Management	Distance	n/a
CHC30912	Certificate III in Employment Services	Distance	n/a
CHC41012	Certificate IV in Community Services Advocacy	Distance	n/a
FNS40710	Certificate IV in Financial Practice Support	Distance	n/a
FNS40911	Certificate IV in Superannuation	Distance	n/a
SIT30112	Certificate III in Tourism	Distance	n/a
SIT50212	Diploma of Events	Distance	n/a

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

INTERVIEWEES

Name	Position	Qualification/Course/Unit code/s
Lisa Jones	Managing Director	BSB30712, CHC41012
James Moran	Director	
Pauline Farrugia	HR Student Adviser	BSB50613
Tracey Jones	Manager Financial Services Training	
Leanne Fragiacomo	Financial Services Student Advisor	FNS40710, FNS40911
Chris Czarnosz	Manager Business & IT Training Services	BSB41513
Jennifer Bird	Events Student Advisor	SIT50212

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 2 of 14

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 22 January 2014: Minor non-compliance

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

AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on 03/02/2014: n/a

AUDIT FINDING BY STANDARD

Standard	Original finding	Finding following rectification
SNR 15	Not compliant	Compliant
SNR 16	Compliant	n/a
SNR 17	Compliant	n/a
SNR 18	Not audited	n/a
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 compliant	Compliant
SNR 24	Not audited	n/a
SNR 25	Not audited	n/a

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 3 of 14

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 Australian College of Commerce and Management Pty Ltd (ACCM) provided training and assessment strategies (TAS) that incorporated each of the qualifications listed above and sampled at audit. The evidence provided does not demonstrate that the strategies for training and assessment meet the requirements of the related Training Packages and provide clear guidance to trainers and assessors regarding the training and assessment process.

- **BSB30712 Certificate III in Work Health and Safety**

The TAS does not provide the trainer/assessor with a clear description of the intended target learner and whether the learner requires access to a workplace for the purposes of collecting assessment evidence.

The combination of two qualifications (Cert III and Cert IV) in the one TAS does not clearly differentiate the target group for each qualification or defines the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **BSB41513 Certificate IV in Project Management Practice**

The TAS does not provide the trainer/assessor with a clear description of the target learner and whether the learner requires access to a workplace for assessment evidence collection.

The combination of two qualifications in the one TAS does not clearly differentiate the target group for each qualification or the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **BSB50613 Diploma of Human Resources**

The TAS does not provide the trainer/assessor with a clear description of the target learner and whether the learner requires access to a workplace for assessment evidence collection.

The combination of two qualifications in the one DAS does not clearly differentiate the target group for each qualification or the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **FNS40710 Certificate IV in Financial Practice Support**

The TAS for does not provide the trainer/assessor with a clear description of the target learner, the course duration and whether the learner requires access to a workplace for assessment evidence collection.

The number of Elective units exceeds the qualification packaging rules of the Training Package and insufficient evidence is provided to demonstrate the TAS has been customised to meet the needs of each work outcome/ target group identified through industry consultation.

- **FNS40911 Certificate IV in Superannuation**

The TAS does not provide the trainer/assessor with a clear description of the target learner, the course duration and whether the learner requires access to a workplace for assessment evidence collection.

The number of Elective units exceeds the qualification packaging rules of the Training Package and insufficient evidence is provided to demonstrate the TAS has been customised to meet the needs of each work outcome/ target group identified through industry consultation.

It is not clear why the TAS indicates it is for a 'dual qualification" as no other qualification is indicated.

- **CHC41012 Certificate IV in Community Service Advocacy**

The TAS does provide the trainer/assessor with a clear description of the target learner, advice as to why the additional *"college required units'* are included in the TAS, how the applicants' competence in these units is to be determined and whether the learner requires access to a workplace for assessment evidence collection.

The combination of three qualifications in the one TAS does not clearly differentiate the target group for each qualification or the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **CHC30912 Certificate III in Employment Services**

The combination of three qualifications in the one TAS does not clearly differentiate the target group for each qualification or defines the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **SIT30112 Certificate III in Tourism**

The TAS does not provide the trainer/assessor with a description of the target learner, identify the physical resources (facilities, equipment etc) required or whether the learner requires access to a workplace for assessment evidence collection.

The combination of three qualifications in the one TAS does not clearly differentiate the target group for each qualification or the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

- **SIT50212 Diploma of Events**

The TAS does not provide the trainer/assessor with a description of the target learner, the course duration, the resources available and whether the learner requires access to the conduct of an actual event for assessment evidence collection.

The combination of three qualifications in the one TAS does not clearly differentiate the target group for each qualification or the criteria on which the applicant is enrolled into each AQF level qualification. Similarly, the TAS does not provide the trainer/assessor with guidance as to the expected learning outcomes for each AQF level.

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 5 of 14

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

BSB30712 Certificate III in Work Health and Safety
BSB41513 Certificate IV in Project Management Practice
BSB50613 Diploma of Human Resources
FNS40710 Certificate IV in Financial Practice Support
FNS40911 Certificate IV in Superannuation
CHC41012 Certificate IV in Community Service Advocacy
CHC30912 Certificate III in Employment Services
SIT30112 Certificate III in Tourism
SIT50212 Diploma of Events

Provide a revised training and assessment strategy for each of the above listed qualifications that:

- demonstrates the customisation of the qualification to meet the needs of the job functions identified by means of the industry consultations and to satisfy the Training Package packaging rules for the qualifications.
- provides a framework to guide the learning requirements and the teaching, learning and assessment arrangements of each qualification (i.e. the macro level requirements of the learning and assessment process).
- indicates the Training Package recommended entry requirements where relevant
- clearly defines the:
  - target learner/s
  - access to required training and assessment physical resources (facilities, plant and equipment, training and assessment material etc) as required by and meets the relevant qualifications, units of competency and training packages.
  - assessment context ie. whether the learner needs access to a workplace or simulated workplace/enviornment for assessment evidence collection, details how a simulated environment will be provided and/or sourced and how these will be checked to ensure appropriateness for conducting training and assessment.

Analysis of rectification evidence:

BSB30712 Certificate III in Work Health and Safety
BSB41513 Certificate IV in Project Management Practice
BSB50613 Diploma of Human Resources
FNS40710 Certificate IV in Financial Practice Support
FNS40911 Certificate IV in Superannuation
CHC41012 Certificate IV in Community Service Advocacy
CHC30912 Certificate III in Employment Services
SIT30112 Certificate III in Tourism
SIT50212 Diploma of Events

Provided a revised training and assessment strategy for each of the above listed qualifications that:

- demonstrates the customisation of the qualification to meet the needs of the job functions identified by means of the industry consultations and to satisfy the Training Package packaging rules for the qualifications.
- provides a framework to guide the learning requirements and the teaching, learning and assessment arrangements of each qualification (i.e. the macro level requirements of the learning and assessment process).
- indicates the Training Package recommended entry requirements where relevant
- clearly defines the:
  - target learner/s
  - access to required training and assessment physical resources (facilities, plant and equipment, training and assessment material etc) as required by and meets the relevant

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 6 of 14

qualifications, units of competency and training packages.
- assessment context ie. whether the learner needs access to a workplace or simulated workplace/enviornment for assessment evidence collection, details how a simulated environment will be provided and/or sourced and how these will be checked to ensure appropriateness for conducting training and assessment.

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

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

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

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 7 of 14

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: 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 audited	**Following rectification:** n/a

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

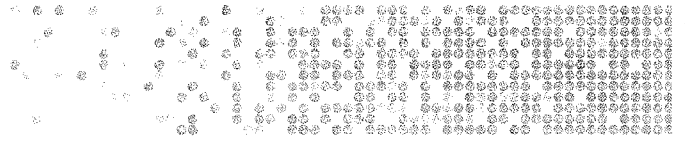| 19.1	The NVR registered training organisation must co-operate with the National VET Regulator: (a) in the conduct of audits and the monitoring of its operations; (b) by providing accurate and timely data relevant to measures of its performance; (c) by providing information about significant changes 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

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 9 of 14

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

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 11 of 14

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 compliant   **Following rectification:** Compliant

Reasons for finding of non-compliance:

- The sample qualification transcript provided by ACCM lists elective units that exceed the number required by the qualification packaging rules of the Training Package; however, should have been issuing a qualification with statement of results (or similar) which meets the packaging rules of the qualification. If a student has completed more units of competency then required, the RTO should issue a statement of attainment for those additional units as required by the Australian Qualification Framework (AQF).

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

- The organisation is required to provide a sample qualification transcript that satisfies the Training Package packaging rules for the qualification and meets the requirements of the AQF.

Analysis of rectification evidence:

- The organisation provided a sample qualification transcript that satisfies the Training Package packaging rules for the qualifications and meets the requirements of the AQF.

23.2	The NVR registered training organisation must recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.
Original finding: Not audited	**Following rectification:** n/a

23.3	The NVR registered training organisation must retain client records of attainment of units of competency and qualifications for a period of 30 years.
Original finding: Not audited	**Following rectification:** n/a

23.4	The NVR registered training organisation must provide returns of its client records of attainment of units of competency and VET qualifications to the National VET Regulator on a regular basis, as determined by the National VET Regulator. [no requirements currently exist]
This element was not audited.	

23.5	The NVR registered training organisation must meet the requirements for implementation of a national unique student identifier. [no requirements currently exist]
This element was not audited.	

SNR 24   Accuracy and integrity of marketing

24.1	The NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.
Original finding: Not audited	**Following rectification:** n/a

24.2	The NVR registered training organisation must use the NRT logo only in accordance with its conditions of use.
Original finding: Not audited	**Following rectification:** n/a

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 13 of 14

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

Australian Skills Quality Authority
Continuing registration audit report - Australian College of Commerce and Management Pty Ltd

Page 14 of 14