



Audit report – VET Quality Framework

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

ORGANISATION DETAILS

Organisation's legal name	Malekhu Investments Pty Ltd
Trading name/s	Queensford College
RTO number	31736
CRICOS number	03010G

AUDIT TEAM

Lead auditor	Ms Emma Betts
Auditor/s	Mrs Karen Noble
Technical adviser/s	n/a

AUDIT DETAILS

Application number/s	1042223
Audit number/s	1003770
Audit reason 1	Application - renewal
Audit reason 2	n/a
Audit reason 3	n/a
Activity type	Site visit
Address of site/s visited	Level 3, 359 Queen Street, Brisbane City, Qld
Date/s of audit	30-31/07/2013
Organisation's contact for audit	Mr Bikash Bhandari Principal Executive Officer b.bhandari@queensford.edu.au 07 3221 1626
NVR standards audited	Selected Standards for Continuing Registration: SNR 15, 16, 17, 18, 20, 22.2

BACKGROUND

- Malekhu Investments Pty Ltd was first registered as a training organisation in July 2008, and was registered for CRICOS in October 2008. The organisation has submitted an application for renewal of VET registration (app 1042223) and an application for renewal of CRICOS registration (app 1045246).
- The organisation is part-owned by four gentlemen, three of whom have senior management authority in the business. Mr Bikash Bhandari is the Chief Executive Officer / Principal Executive Officer, Mr Rupesh Pathak is the Head of Operations, and Mr Santosh Pandey is the Head of Marketing. The organisation also employs four trainers and assessors, has an administration team, and contracts two external consultants to assist with compliance management.



- While the organisation has a lease to deliver over two levels at 359 Queen Street Brisbane, delivery has only been undertaken on one floor due to limited student numbers.
- To date, the organisation's core clients have been international students studying on a Visa. The organisation advised it was reviewing its marketing strategy and was considering focusing delivery on the domestic market; initial analysis has considered mixed mode delivery, alternative funding arrangements, and applying for delivery in Higher Education.
- The organisation does not have any partnering relationships.
- Total number of student completions in the last 12 months: 237
- Total number of current enrolments in RTO as at audit date: 150

AUDIT SAMPLE

Code	Qualification/Course/Unit name	Mode/s of delivery/assessment*	Current enrolments (If not yet on scope, record N/A)
BSB20112	Certificate II in Business	Face to face	0
BSB51107	Diploma of Management	Face to face	37
BSB51207	Diploma of Marketing	Face to face	44
BSB60507	Advanced Diploma of Marketing	Face to face	0
FNS40611	Certificate IV in Accounting	Face to face	0
FNS50210	Diploma of Accounting	Face to face	0

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

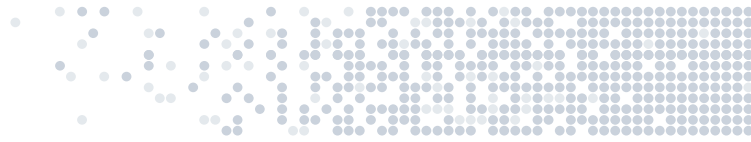
INTERVIEWEES

Name	Position	Qualification/Course/Unit code/s
Bikash Bhandari	Principal Executive Officer	n/a
Rupesh Pathak	Head of Operations	n/a
Santosh Pandey	Head of Marketing	n/a
Lucy Pandya	Trainer and assessor	BSB51107
Ting Jin	Trainer and assessor	BSB51207, BSB60507
Ramesh Krishna	Trainer and assessor	FNS50210

ORIGINAL AUDIT FINDING AT TIME OF AUDIT

Audit finding as at 31/07/2013: Significant 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.

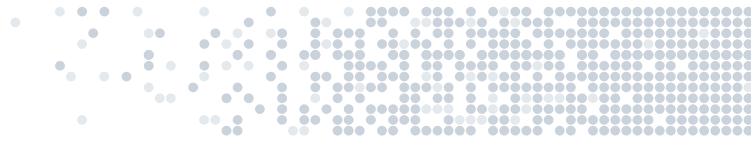


AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

Audit finding following analysis of additional evidence provided on dd/mm/yyyy: n/a

AUDIT FINDING BY STANDARD

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

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: n/a

Reasons for finding of non-compliance:

BSB20112 Certificate II in Business

- The strategy for training and assessment described education requirements for its training and assessment staff which did not meet the Assessor Competency Requirements of the BSB07 Training Package. The strategy identified that all delivery and assessment would be “conducted by experienced (staff) who have minimum Bachelor’s degree”; this requirement would not ensure delivery would be undertaken by trainers and assessors who have relevant vocational competencies for the qualification.

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

BSB20112 Certificate II in Business

- Provide a strategy for training and assessment which describes requirements to ensure delivery would be undertaken by trainers and assessors who have relevant vocational competencies for the qualification.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: n/a

Reasons for finding of non-compliance:

BSB20112 Certificate II in Business

BSB51107 Diploma of Management

BSB51207 Diploma of Marketing

BSB60507 Advanced Diploma of Marketing

- As non-compliances were identified in SNR 15.4, the organisation did not demonstrate its training and assessment staff were consistent with the requirements of the relevant Training Packages.



BSB20112 Certificate II in Business
BSB60507 Advanced Diploma of Marketing

- As non-compliances were identified in SNR 15.5, the organisation did not demonstrate assessment materials were consistent with the requirements of the relevant Training Packages

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

BSB20112 Certificate II in Business
BSB51107 Diploma of Management
BSB51207 Diploma of Marketing
BSB60507 Advanced Diploma of Marketing

- Evidence provided to satisfactorily address the non-compliances identified in SNR 15.4 and 15.5 will demonstrate the organisation has staff and assessment materials consistent with the requirements of the relevant Training Packages.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: n/a

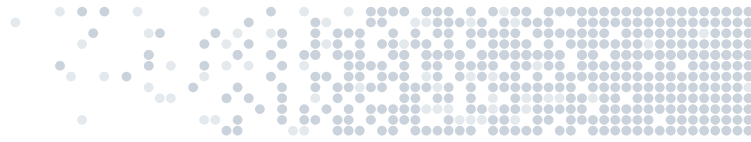
Reasons for finding of non-compliance:

BSB20112 Certificate II in Business

- The organisation advised it had not employed a trainer and assessor to deliver this qualification. As a result, evidence did not demonstrate the qualification was delivered by trainers and assessors who:
 - had the necessary training and assessment competencies as determined by the National Skills Standards Council;
 - had relevant vocational competencies at least to the Certificate II level;
 - could demonstrate current industry skills directly relevant to the training/assessment being undertaken;
 - had continued to develop their vocational education and training knowledge and skills as well as their industry currency and trainer/assessor competence.

BSB51107 Diploma of Management

- Evidence did not demonstrate the trainer and assessor, Lucy Pandya, had relevant vocational competencies at least to the level being delivered or assessed, current industry skills directly relevant to the training/assessment being undertaken, or that she had continued to develop her industry currency.
 - Copies of a certificate in computing (issued 1998) and a Masters of Business Administration (issued 2006) were provided, with both documents issued in India. Evidence did not clearly demonstrate how these records of attainment confirmed



competence in the vocational qualification, including current knowledge and skills relevant to delivery in Australia.

- A trainer matrix was provided (information for this qualification last updated in 2009) which referenced past employment, predominantly as a lecturer in business management, in India. While the matrix did list evidence against each unit of competency, the information provided did not demonstrate how the employment duties confirmed vocational competence in the qualification. In addition, the matrix did not provide evidence of current skills relevant to the training/assessment being undertaken and specifically to industry in Australia.

BSB51207 Diploma of Marketing

BSB60507 Advanced Diploma of Marketing

- Evidence did not demonstrate the trainer and assessor, Ting Jin (Amanda), had current industry skills directly relevant to the training/assessment being undertaken.
 - A trainer matrix was provided which referenced past employment in marketing in 2009. The matrix did not provide further evidence to demonstrate the development of skills in industry since that time.

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

BSB20112 Certificate II in Business

- Provide evidence of its trainer and assessor for the qualification, and demonstrate how this person meets the requirements of SNR 15.4 by providing evidence of their:
 - training and assessment competencies as determined by the National Skills Standards Council;
 - relevant vocational competencies at least to the Certificate II level;
 - current industry skills directly relevant to the qualification;
 - development of vocational education and training knowledge and skills, as well as industry currency and trainer/assessor competence.

BSB51107 Diploma of Management

- Provide evidence that Lucy Pandya has relevant vocational competencies at least to the level being delivered or assessed, current industry skills directly relevant to the training/assessment being undertaken, and that she has continued to develop her industry currency.

BSB51207 Diploma of Marketing

BSB60507 Advanced Diploma of Marketing

- Provide evidence that Ting Jin (Amanda) has current industry skills directly relevant to the training/assessment being undertaken.

Analysis of rectification evidence:

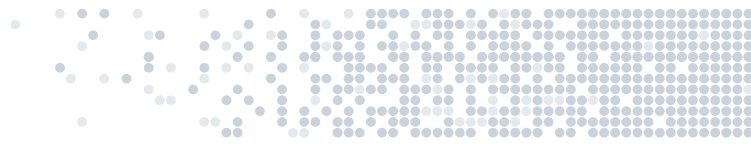
- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: n/a

Reasons for finding of non-compliance:

BSB20112 Certificate II in Business

BSBCUS201B Deliver a service to customers

- Assessment did not meet the requirements of the BSB07 Training Package and did not ensure that evidence collected would meet the rules of evidence, specifically valid and sufficient evidence.
 - The tools did not address all of the required knowledge and critical aspects of assessment, specifically where knowledge of relevant legislation is required.
 - The “assessor guide” did not provide the assessment decision-making rules for all tools to judge the quality of performance; to ensure performance standards would be consistent with the requirements of the unit, and to ensure assessment would be conducted consistently.

BSBSUS201A Participate in environmentally sustainable work practices

- Assessment did not meet the requirements of the BSB07 Training Package and did not ensure that evidence collected would meet the rules of evidence, specifically valid and sufficient evidence.
 - The tools did not address all of the required knowledge, required skills, critical aspects of assessment, or the context of and specific resources for assessment.
 - The “assessor guide” did not provide the assessment decision-making rules for all tools to judge the quality of performance; to ensure performance standards would be consistent with the requirements of the unit, to ensure all requirements of the unit would be addressed, and to ensure assessment would be conducted consistently.
 - Where direct observation would be undertaken, the evidence criteria (“observation checklist”) was a copy of the performance criteria and did not describe the specific tasks to be administered to the student; consequently the decision-making rules, to judge the quality of performance and ensure performance standards would be consistent with the requirements of the, had not been defined.

BSB60507 Advanced Diploma of Marketing

BSBMKG603B Manage the marketing process

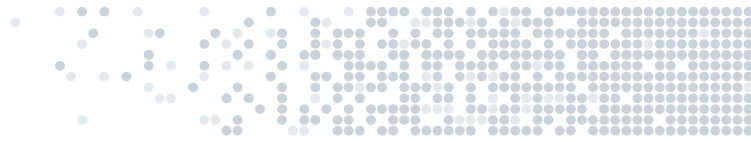
- Assessment did not meet the requirements of the BSB07 Training Package and did not ensure that evidence collected would meet the rules of evidence, specifically valid and sufficient evidence.
 - The tools did not address all of the elements and performance criteria, required skills, critical aspects of assessment, context of and specific resources for assessment, or range statement.
 - The tools were not addressed to the appropriate AQF level and did not require the student to demonstrate the outcomes, skills and knowledge to strategically manage the marketing process and marketing personnel within an organisation; most assessment questions required the student to recall and list information only.
 - The assessment tool four (presentation) did not include sufficient instruction for a student or assessor. Although the task was identified as a presentation and basic heading topics were given, the information did not clearly describe the context of the assessment or the tasks to be undertaken, and did not provide an outline of the evidence to be gathered from the student.

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

BSB20112 Certificate II in Business

BSBCUS201B Deliver a service to customers

- Provide its suite of assessment tools to demonstrate:
 - assessment addresses all of the requirements of the BSB07 Training Package, including the required knowledge and critical aspects of assessment;
 - guidance is provided for an assessor to judge the quality of performance and ensure valid and sufficient evidence, which is consistent with the requirements of the unit,
-



would be gathered.

BSBSUS201A Participate in environmentally sustainable work practices

- Provide its suite of assessment tools to demonstrate:
 - assessment addresses all the requirements of the BSB07 Training Package, including the required knowledge, required skills, critical aspects of assessment and the context of and specific resources of assessment;
 - guidance is provided for an assessor to judge the quality of performance and ensure valid and sufficient evidence, which is consistent with the requirements of the unit, would be gathered;
 - where assessment is undertaken by direct observation, guidance is provided for an assessor which describes the specific tasks to be administered to the student and ensures valid and sufficient evidence would be gathered.

BSB60507 Advanced Diploma of Marketing

BSBMKG603B Manage the marketing process

- Provide its suite of assessment tools to demonstrate:
 - assessment addresses all the requirements of the BSB07 Training Package, including the elements and performance criteria, required skills, critical aspects of assessment, context of and specific resources for assessment, and the range statement;
 - assessment tasks are addressed at the appropriate AQF level, to ensure valid and sufficient evidence would be gathered;
 - sufficient instructions are provided for a student and assessor to clearly describe the context of the assessment, the tasks to be undertaken, and an outline of the evidence to be gathered from the student.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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.

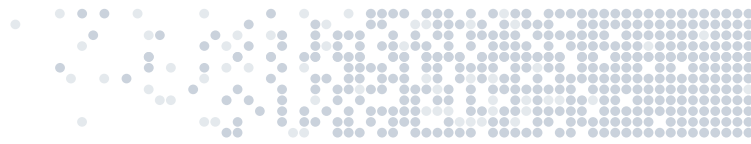
Original finding: Compliant

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: 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: Compliant	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: Compliant	Following rectification: n/a
17.4	The NVR registered training organisation manages records to ensure their accuracy and integrity.
Original finding: Compliant	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: n/a

Reasons for finding of non-compliance:

- The non-compliances identified demonstrated the organisation's Chief Executive had not ensured compliance with the VET Quality Framework across all of its operations.

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

- Evidence provided to satisfactorily address the non-compliances identified at audit will demonstrate the organisation's Chief Executive has ensured compliance with the VET Quality Framework across all of its operations.

Analysis of rectification evidence:

- Evidence yet to be supplied

Reasons for outstanding non-compliance:

- Not applicable at this time

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: Compliant

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:

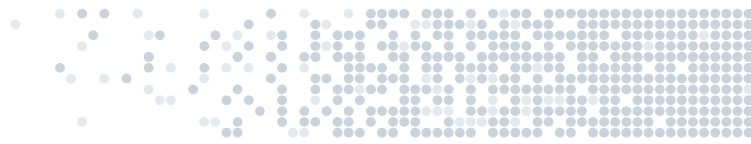
- (a) the total amount of all fees including course fees, administration fees, materials fees and any other charges;**
- (b) payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee;**
- (c) the nature of the guarantee given by the NVR registered 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: Compliant

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; [option 2 not currently available]~~**
- (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.~~ [option 5 not currently available]

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]

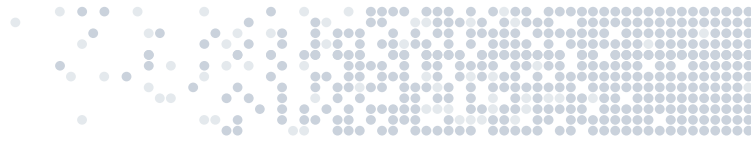
This element was not audited.

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 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

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