VET Quality Framework audit report

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

Legal name of organisation	Tactical Training Group
Application number	1032841
Dates of site audits	12, 13 December 2012 (Sydney) 21 December 2012 (Brisbane)
Date of interim audit report	21 January 2013

ORGANISATION DETAILS

RTO legal name	Tactical Training Group		RTO ID number	91054
Registered business trading name			ABN	57094224076
Address	Level 2, 8-10 Loftus St, Sydney		Postcode	2000
Phone	94602511	Fax	89201033	
E-mail	a.lewis@tacticaltraininggroup.com.au	Website	www.tacticaltraininggroup.com.au	
Registration contact	**Name** Andrew Lewis		**Position** CEO	

AUDIT TEAM

Lead auditor	Jane Connors	**Technical adviser/s**	
Audit team members	Anne Maree Newbery		

ASQA CONTACT DETAILS

Phone	1300 701801 (ASQA Info line)	E-mail	audits@asqa.gov.au

AUDIT DETAILS

Audit type	☒ Renewal of registration ☐ Extension to scope of registration ☐ Compliance monitoring (incl. post-initial registration) ☐ Other:
Scope of audit	☒ Standards for NVR Registered Training Organisations ☒ Australian Qualifications Framework (AQF) ☒ Data Provision Requirements ☒ Fit and Proper Person Requirements ☒ Financial Viability Risk Assessment Requirements
Date/s of site visit/s	12 December and 13 December 2012 (Sydney); 21 December 2012 (Brisbane)
Site/s visited	
Standards audited	Essential Standards for Continuing Registration 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25

ORGANISATION

A site audit was conducted in Sydney on 12th and 13th December 2012 by Jane Connors of the Sydney Regional Compliance team; another site audit was conducted in Brisbane on 21 December by Anne Maree Newbery, an ASQA Panel auditor. Where appropriate, this audit report separates the findings of the two auditors.

Sydney audit background
Audit history
Tactical Training Group Pty Ltd trading as Central Coast Hospitality was first registered in January 2005. The RTO's core training delivery is in the Hospitality industry, all delivery is employment based and largely through traineeships. The RTO has Certificates II, III, IV and Diploma of Hospitality on its scope of registration, as well as qualifications from the Retail Services Training Package and Business Services Training Package. The CEO's background is in the Hospitality industry and the business has grown significantly in this sector. The Queensland operation began 2010 and there is also an office in Victoria. All current records are kept in the Sydney head office.

A renewal of registration audit was undertaken by VETAB on 16 February 2010. The audit identified significant non-compliances. The RTO was granted an extension of registration of 6 months with conditions attached that included a monitoring visit to be undertaken after this extension period to review compliance and implementation of proposed actions identified. The monitoring visit was undertaken on 27 May 2011. Following non-compliances identified at the monitoring audit, ASQA Commissioners made a decision to approve re-registration for 12 months per letter dated 12 December 2011, with the condition that the two retail qualifications (SIR30207 and SIR40207) be removed and a further monitoring audit be conducted within one year.

On 10 January 2012, the organisation reapplied to add the two retail qualifications to scope. The RTO met compliance with Standards for NVR Registered Training Organisations for these qualifications on 16 March 2012. SIR30212 (released 13 June 2012) and SIR40212 (released 13 June 2012) have since been added to Tactical Training Group (TTG)'s scope of registration on scope. The superseded retail qualifications, SIR30207 and SIR40207, are to be removed from the RTO's scope of registration as part of this audit.

Current business activity

Of 1815 current enrolments at the time of audit, 1522 were enrolled in Hospitality courses; this renewal of registration audit sampled delivery in the two states with the highest number of current enrolments: NSW (1316 current enrolments at time of audit scheduling) and Queensland (333 current enrolments at time of audit scheduling). Small numbers of enrolments have also been recorded in Victoria, South Australia, the ACT and WA.

Current enrolment numbers by qualification that have been supplied by TTG for the purposes of this audit are as follows:

Training product	Current enrolments (28 September 2012)
SIT20207 Cert II Hospitality	5
SIT30707 Cert III Hospitality	1417
SIR30207 Cert III Retail	203
BSB40507 Cert IV Business Administration	31
BSB40807 Cert IV Frontline Management	38
SIT40307 Cert IV Hospitality	105
SIT50307 Diploma of Hospitality	1
BSB51107 Diploma of Management	5

Core clients

Key clients include Max Brenner, Merivale Group, IGA supermarkets and Caltex.

Fee revenue sources January 2012 - November 2012

At the Sydney audit, TTG stated that the breakdown of funding in this period is as follows: Existing worker: 383, Fee for service (funded by the employer): 217; New worker 1070

Future plans

The RTO hopes to offer more fee for service training; it also intends to broaden blended delivery to include more e-learning.

Queensland audit

This audit was focussed only on the Queensland operations of Tactical Training Group (TTG) and was conducted to supplement the earlier site audit undertaken at TTG's Head Office in Sydney.

In Queensland, TTG offers funded Traineeships for qualifications in Hospitality, Retail, Business Administration and Frontline Management. No fee-for-service training, including short courses, is offered as yet in this State.

TTG began its Queensland operations in 2010 and delivers services to its 4-5 standalone Queensland clients plus its Queensland-based national clients.

TTG currently has 300-350 active trainees nationally.

FOCUS OF AUDIT		
Code	**Qualification / Accredited course name**	**Mode(s) of delivery &/or assessment**
SIT30707	Certificate lll in Hospitality (1417 active students, 378 quals issued, 314 SOA's issued) delivery in Qld, NSW, ACT, Victoria, WA	Employment based

SIT40307	Certificate lV in Hospitality (105 active students, 20 quals issued) delivery in Qld and NSW	Employment based
BSB40507	Certificate lV in Business Administration (31 active enrolments – Qld and NSW)	Employment based
BSB40807	Certificate lV in Frontline Management (Qld and NSW)	Employment based
SIR30212	Certificate lll in Retail Operations (added to scope after renewal application was lodged – amendment application number 1034959)	Employment based
SIR40212	Certificate lV Retail Management (added to scope after renewal application was lodged – amendment application number 1034959)	Employment based

INTERVIEWEES		
Staff (name and position)		
Name	**Position**	**Program** (qualification, course, etc)
Andrew Lewis CEO (present at Sydney and Brisbane audits)	CEO	N/A
Sylvia Boyd (present at Sydney and Brisbane audits)	RTO Director	N/A
Simon Power (present at Sydney and Brisbane audits)	National Training Manager	N/A
Judith Bowler (present at Sydney audit)	Chair of TTG Continuous Improvement Committee	N/A
Andrea Rodriguez (present at Sydney audit)	Admin Manager	N/A
Gerald Schlebusch (present at Sydney audit)	trainer	All qualifications sampled at audit

SUMMARY OF AUDIT OUTCOME

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

AUDIT OUTCOME

Audit status as at 21 January 2013

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

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

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

Auditor's Name	Jane Connors	Signature		Date of Report	21 January 2013
Auditor's Name	Anne Maree Newbery	Signature		Date of Report	21 January 2013

		AUDIT RECTIFICATION			

Audit status following additional evidence received 22 February 2013

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

Auditor's Name	Jane Connors	Signature		Date of Report	8 March 2013
Auditor's Name	Anne Maree Newbery	Signature		Date of Report	8 March 2013

AUDIT SUMMARY OF VET QUALITY FRAMEWORK REQUIREMENTS

VET Quality Framework Component	STATUS*
Financial Viability Risk Assessment Requirements	☒ C ☐ NC ☐ NA
Fit and Proper Person Requirements	☒ C ☐ NC ☐ NA
Data Provision Requirements	☒ C ☐ NC ☐ NA
Australian Qualifications Framework (AQF) Requirements	☒ C ☐ NC ☐ NA
Standards for NVR Registered Training Organisations 2011 - Essential Standards for Continuing Registration	
15 The NVR registered training organisation provides quality training and assessment across all of its operations	☒ C ☒ NC ☐ NA
16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients	☒ C ☒ NC ☐ NA
17 Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates	☒ C ☐ NC ☐ NA
18 The NVR registered training organisation has governance arrangements in place	☒ C ☒ NC ☐ NA
19 Interactions with the National VET Regulator	☒ C ☐ NC ☐ NA
20 Compliance with legislation	☒ C ☐ NC ☐ NA
21 Insurance	☒ C ☐ NC ☐ NA
22 Financial management	☒ C ☒ NC ☐ NA
23 Certification, issuing and recognition of qualifications and statements of attainment	☒ C ☐ NC ☐ NA
24 Accuracy and integrity of marketing	☒ C ☒ NC ☐ NA
25 Transition to training packages/expiry of VET accredited courses	☒ C ☐ NC ☐ NA

*STATUS: Status of audit findings   when audit was conducted   C = Compliant   NC = Not Compliant   NA = Not audited

Audit Findings

Tactical Training Group Company is not compliant with the VET Quality Framework. Insufficient evidence is available to demonstrate compliance with NVR Standards: 15.2, 15.5, 16.3, 16.7, 18.1, 22.2 and 24.2.

SNR 15.2

The RTO is non-compliant with SNR 15.2 because:

- TTG did not provide sufficient evidence to demonstrate that its training and assessment strategies meet the requirements of the training package.
  - The training and assessment strategy documents for the Certificate III in Hospitality show an incorrect unit of competency code for SITHIND003A. They also include the following three superseded units: SITXOHS001A, SITHFAB010A & SITXHRM001A.
  - The training and assessment strategy document for the Certificate IV in Hospitality includes the superseded unit SITHIND001A.
- TTG did not provide sufficient evidence to demonstrate that its training and assessment strategies provide clear direction for its trainers and assessors.
  - All training and assessment strategy documents sighted at audit include wording directly from the qualification packaging rules that refer to "elective units listed below". This wording is out of context in the strategy documents as the lists of elective units have not been included.

SNR 15.5

The RTO is non-compliant with SNR 15.5 because there was insufficient evidence to demonstrate that all assessments meet the requirements of the training package and are conducted in accordance with the principles of assessment and the rules of evidence. The following areas of non-compliance were identified:

- SITHFAB010C Prepare and serve non-alcoholic beverages
    - There is one demonstration assessment for this unit that is directly observed by the assessor and this requires the candidate to prepare <u>one drink</u>. This does not meet the critical aspects for assessment that requires the "ability to prepare and serve a variety of coffees, teas and non-alcoholic beverages correctly and within acceptable enterprise timeframes".
    - There was no evidence of a demonstration assessment tool, such as an observation checklist, that would allow the assessor to record observations about the candidate's demonstrated skill and underpinning knowledge during the practical assessment. The absence of such a tool it is likely to mean that insufficient assessment evidence is being retained to demonstrate the assessor's judgment of the student's performance against the required standards.
    - Based on the demonstration assessment noted above, together with the other evidence collection tools (knowledge test and third party report), it is unclear how a valid assessment judgment is made for the following required skills:
        - Problem-solving skills to resolve drinks curdling, coffee strength or milk texturisation
        - Customer service skills for determining customer requirements and preferences
        - Communication skills to liaise with customers and other team members, clarify requirements, provide information and listen to and interpret information and non-verbal communication
- SITXINV001A Receive and store stock
    - There was no evidence of an assessor marking guide for the case study assessment which may make the assessment tool unreliable across different assessment contexts and assessors.
    - There was no direct evidence collected of the candidate's ability to demonstrate safe manual handling techniques. It was stated at audit that practical skills were assessed in the OHS unit but there was no evidence in the Assessment Mapping, or other assessor instructions, to support this.
    - With no direct observation of skill demonstration by the assessor, it is unclear how a valid assessment judgment is made for the required "Communication skills to make accurate verbal or written reports of stock discrepancies".
- SITXHRM003A Roster staff
    - The assessor marking guide for the knowledge test showed seven questions mapped to the unit's competency requirements however there were only five questions in the assessment tool.
    - With no direct observation of skill demonstration by the assessor and no assessment that requires the candidate to plan and prepare a roster, it is unclear how a valid assessment judgment is made for the following required skills:
        - organisational skills to plan rosters to meet operational needs
        - literacy skills to develop potentially complex roster documentation
        - communication skills to consult with colleagues, ask questions and confirm requirements, and listen, understand and interpret verbal and non-verbal messages
        - numeracy skills to undertake planning activities involving dates, times and staff ratios
    - On a reviewed student file (Natalie Lehman, ID: 201147263), Assessment Task 3 had been crossed out but there were no supporting comments as to why this assessment was not required. Also, the Competency Record contained no comments to support the assessor's judgment. Such practices are likely to mean that insufficient assessment evidence is being retained to demonstrate the assessor's judgment of the student's performance against the required standards.

SNR 16.3

The RTO is non-compliant with SNR 16.3 because:

- The flyer for the course *'S.M.A.R.T. (Student mentoring on Alcohol Responsibility Training), Alcohol Awareness & Responsible Service of Alcohol Program for Schools',* does not clearly identify the course as being the UOC (SITHFAB009A Provide Responsible service of Alcohol);
- also documents relevant to this course do not include fees information for students

SNR 16.7

The RTO is non-compliant with SNR 16.7 because:

- There is not a process to address complaints and appeals for all states and territories where training and assessment is

delivered.

SNR 18.1

The RTO is non-compliant with SNR 18.1 because:

- Audit has identified non-compliances by the RTO with the VET Quality Framework

SNR 22.2

The RTO is non-compliant with SNR 22.2 because:

- The short course registration form used for *SITHFAB009A Provide Responsible service of Alcohol, SITHGAM006A Provide Responsible Gaming Services and SITXOHS002A SITXFSA001A Food Safety Supervisor* does not include fees information.

SNR 24.2

The RTO is non-compliant with SNR 22.2 because:

- marketing flyer sighted for the *'S.M.A.R.T. (Student mentoring on Alcohol Responsibility Training), Alcohol Awareness & Responsible Service of Alcohol Program for Schools',* does not clearly identify the course as the AQF qualification *SITHFAB009A Provide Responsible service of Alcohol*

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

Rectification required for SNR 15.2

The RTO is required to provide evidence of training and assessment strategies for SIT30707 Certificate lll in Hospitality and SIT40307 Certificate lV in Hospitality that meet the requirements of the training package and accurately reflect its current delivery and assessment approach.

Rectification required for SNR 15.5

The RTO is required to provide evidence of assessment materials that meet the requirements of the training package and are conducted in accordance with the principles of assessment and the rules of evidence. Whilst TTG is required to ensure the compliance of assessments across its entire scope of operation, evidence need only be submitted for the following units of competency:

- SITHFAB010C Prepare and serve non-alcoholic beverages
- SITXINV001A Receive and store stock
- SITXHRM003A Roster staff

Rectification required for 16.3

The RTO is required to identify courses by their correct unit code and title, and also to include clear and sufficient information on course fees; for example, the RTO must provide fee information and clearly identify the course by its unit code and unit title on the flyer for the course *'S.M.A.R.T. (Student mentoring on Alcohol Responsibility Training), Alcohol Awareness & Responsible Service of Alcohol Program for Schools'*

Rectification required for 16.7

The RTO is required to provide documented complaints and appeals processes for all States and Territories where delivery takes place.

Rectification required for SNR 18.1

The Chief Executive is required to provide evidence of compliance as outlined in the rectification requirements in this report for SNRs 15.2, 15.5, 16.3, 16.7 and 22.2.

Rectification required for 22.2

The RTO is required to include information on fees in all relevant documentation; for example, the RTO must provide fee information on the short course registration form for *SITHFAB009A Provide Responsible service of Alcohol, SITHGAM006A Provide Responsible Gaming Services and SITXOHS002A SITXFSA001A Food Safety Supervisor*.

Rectification required for 24.2

The RTO is required to accurately identify AQF qualifications in its marketing materials to prospective students.

Audit Findings from rectification evidence received 22 February 2013

The RTO has demonstrated compliance with SNR 15.2 because:

- revised training and assessment strategy documents provided sufficient evidence to demonstrate that the RTO's training and assessment strategies meet the requirements of the training package and accurately reflect the current delivery and assessment approach for these qualifications.

The RTO has demonstrated compliance with SNR 15.5 because:

- revised assessment resources provided sufficient evidence to demonstrate that the RTO's assessments meet the requirements of the training package and will be conducted in accordance with the principles of assessment and the rules of evidence.

The RTO has demonstrated compliance with SNR 16.3 because:

- revised documents inform clients of the training and assessment services to be provided by the RTO; specifically: the revised course flyer for the S.M.A.R.T. Program clearly identifies the relevant UOC, *SITHFAB009A Provide Responsible service of Alcohol*; the revised short courses registration form include details of cost of the course and payment procedure for S.M.A.R.T. Program

The RTO has demonstrated compliance with SNR 16.7 because:

- revised complaints appeals documentation provide evidence that the NVR registered training organisation provides appropriate mechanisms and services for learners in all states and territories to have complaints and appeals addressed efficiently and effectively.

The RTO has demonstrated compliance with SNR 18.1 because:

- for the purposes of this audit, non-compliances have been rectified and the NVR registered training organisation's chief executive has ensured that the NVR registered training organisation complies with the VET Quality Framework.

The RTO has demonstrated compliance with SNR 22.2:

- revised course documentation for the S.M.A.R.T. Program provides relevant fee information to clients

Auditor notes that this non-compliance was incorrectly identified as non-compliance with SNR 24.2 in the interim audit report.
The RTO has demonstrated compliance with SNR 24.1 because:

- revised marketing material for the S.M.A.R.T. Program now includes accurate marketing and advertising of the AQF qualification *SITHFAB009A Provide Responsible Service of Alcohol*