



## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	BIGA LTD
Trading name/s	BIGA Training
RTO number	30822
CRICOS number	na

#### AUDIT TEAM

Lead auditor	Wayne Stent
Auditor/s	n/a
Technical adviser/s	n/a

#### AUDIT DETAILS

Application number/s	n/a	
Audit number/s	1005281	
Audit reason 1	Compliance - monitoring	
Audit reason 2	n/a	
Audit reason 3	n/a	
Activity type	Other	
Address of site/s visited	n/a	
Date/s of audit	22/04/2014	
Organisation's contact for audit	Mr Bradley Gray	CEO
	bgray@biga.com.au	(07) 82051855
NVR standards audited	Selected Standards for Continuing Registration: 15.2, 15.3, 15.4, 15.5, 18.1 and 24.1	

#### BACKGROUND

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

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

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



BIGA Training has been identified as delivering *CPCCE3014A Remove non-friable asbestos*.

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

#### ORIGINAL AUDIT FINDING AT TIME OF AUDIT

##### Audit finding as at 22/04/2014: Critical non-compliance

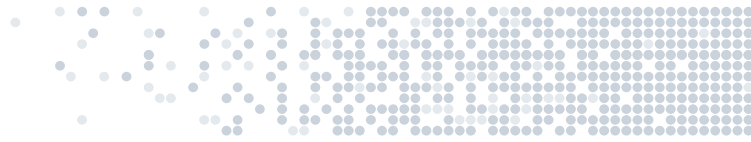
- The level of non-compliance considers the potential for an adverse impact on the quality of training and assessment outcomes for students.
- If non-compliance has been identified, this audit report describes evidence of the non-compliance.
- Refer to notification of non-compliance for information on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

#### AUDIT FINDING FOLLOWING ANALYSIS OF RECTIFICATION EVIDENCE

##### Audit finding following analysis of additional evidence provided on 29/05/2014: Compliant

#### AUDIT FINDING BY STANDARD

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



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

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The RTO provided the following evidence:
  - Learning and Assessment Strategy

The learning and assessment strategy does not provide an adequate framework to guide the learning requirements and the teaching, training and assessments at the macro level to ensure that training package and industry requirements are met. The strategy provides only generic information and does not provide sufficient information for trainers and assessors about:

- Pre-requisite unit requirements *CPCCOHS1001A Work safely in the construction industry* for entry into the course
- Employer responsibilities in the collection of 3<sup>rd</sup> party evidence
- Equipment and infrastructure requirements and the use of simulated workplace for workshop delivery and assessment (Refer to SNR15.3 also)

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

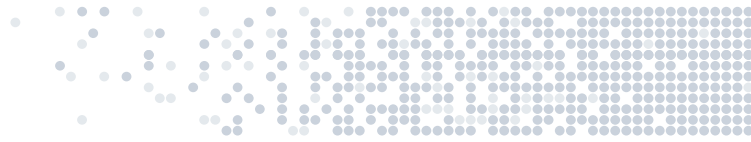
- Provide a revised learning and assessment strategy that provides detail about the following:
  - Pre-requisite unit requirements *CPCCOHS1001A Work safely in the construction industry* for entry into the course
  - Employer responsibilities in the collection of 3<sup>rd</sup> party evidence
  - Equipment and infrastructure requirements and the use of simulated workplace for workshop delivery and assessment (Refer to SNR15.3 also)

*Analysis of rectification evidence:*

- Evidence supplied
  - Revised Learning and assessment strategy for *CPCCDE3014A Remove non-friable asbestos*

The revised LAS now addresses training package requirements and provides sufficient guidance for trainers and assessors about delivery and assessment arrangements.

The RTO is compliant.



**15.3 Staff, facilities, equipment and training and assessment materials used by the NVR registered training organisation are consistent with the requirements of the Training Package or VET accredited course and the NVR registered training organisation's own training and assessment strategies and are developed through effective consultation with industry.**

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The RTO provided the following evidence for *CPCCE3014A Remove non-friable asbestos*:
  - Learning and assessment strategy
  - Safe work practices
  - Student handout/Asbestos learning package
  - Assessment package
  - Workbook
- Insufficient evidence has been provided to demonstrate that the RTO has all of the necessary equipment and infrastructure to meet the requirements of the training package.

According to the RTO's learning and assessment strategy the unit is delivered at multiple sites ie. Brendale, Bundaberg, Rockhampton, Mackay and Townsville. The strategy simply states that 'Each of the sites has the facilities to conduct the training and assessment activities'. The strategy does not identify the equipment and resources that must be available at each site nor describe how the RTO establishes simulated workplaces for the delivery of training and assessment.

- The assessment tools and instruments provided do not provide sufficient guidance for assessors or learners about the context of the assessment within the simulated workshop activities. Refer to SNR15.5 for detailed findings.
- Insufficient evidence has been provided to demonstrate that trainers/assessors satisfy the endorsed assessment guidelines requirements for assessors. Refer to SNR15.4 for detailed findings.

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

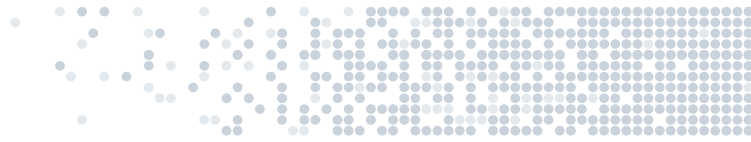
- Provide a revised learning and assessment strategy or other supporting documents which demonstrates that the RTO has in place all of the equipment and infrastructure in place at all of its delivery sites to meet the resourcing requirements of the training package and that provides details about the simulated workplaces used at each site for the delivery of training and assessment.
- Refer to SNR15.4 for rectification evidence regarding required for trainers/assessors.
- Refer to SNR15.5 for rectification evidence required for assessments.

*Analysis of rectification evidence:*

- Evidence supplied
  - Learning and assessment strategy
  - Assessor Pack

The revised strategy and supporting assessor's pack provides details about arrangements for simulated training at each of its training venues and requirements for employer validation of on the job skills.

Sufficient evidence has been supplied to demonstrate that the non-compliances identified under



SNR15.4 and 15.5 have been rectified. Refer to SNR15.4 and 15.5 for listing of evidence supplied and detailed findings.

The RTO is compliant.

- 15.4 Training and assessment is delivered by trainers and assessors who:**
- (a) have the necessary training and assessment competencies as determined by the National Skills Standards Council or its successors; and**
  - (b) have the relevant vocational competencies at least to the level being delivered or assessed; and**
  - (c) can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and**
  - (d) continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence.**

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

Insufficient evidence has been provided to demonstrate that Paul Lagosha and Brad Grey have relevant industry experience, that is, workplace experience within the last two years in the competency area being delivered to satisfy the requirements for assessors listed in the endorsed assessments of the Construction, Plumbing and Services Training Package.

#### **Evidence provided for Paul Lagosha**

- *Certificate IV in Building and Construction (Building)* - TAFE Queensland, November 2012
- Trade Certificate Carpentry and Joinery - Department of Education Queensland, March 1984
- Building Services Authority Licence No. 74681 issued April 2013 for the following classes:
  - Building restricted to alterations and additions (Nominee supervisor)
  - Builder - Low rise (Nominee supervisor)
  - Carpentry (Nominee supervisor)
  - Joinery (Nominee supervisor)
  - Building restricted to renovations, repairs and maintenance (Nominee supervisor)
- Statement of attainment for *CPCCE3014A Remove non-friable asbestos* – BIGA Training, May 2013
- *30215QLD Course in general safety induction (Construction industry)* – March 2008
- Certificate of competency – Explosive power tool operation- February 1985
- Staff training record
- Workplace Health and Safety Queensland – Bonded Asbestos Removal Certificate No. 02115246, Expired 18/05/2013
- Queensland Department of Employment and Industrial Relations letter dated 22/01/2014 regarding information for holders of transitional bonded asbestos removal certificate (Class B) confirming that licenses will be recognised up to 31 December 2014.

#### **Findings for Paul Lagosha**

Although Paul Lagosha holds a statement of attainment for *CPCCE3014A Remove non-friable asbestos* and license for bonded asbestos removal that will be recognised by the Queensland Government Department of Employment and Industrial Relations until 31 December 2014, there is insufficient verifiable evidence given in the staff training record to confirm that he has workplace experience within the last two years in the competency area being delivered.

The staff training record for Paul does not include verifiable evidence detailing asbestos removal work he has performed in the last two years. For example the staff training record indicates that on 30/12 2013 he carried out construction (one week on site) work at "The King Catholic Primary School". There is no detail regarding who he was employed with or the actual asbestos removal



work performed. The email on 4 April 2014 from Patricia McGuigan to the Lead Auditor in response to the Lead Auditor's request for legible evidence asserts his industry currency through still being active as a builder removing asbestos sheeting in bathroom renovations and asbestos roofing and quotes his as ABN 72 798 140 070. However a search of the Australian Securities and Investments Commission shows that Paul Lagosha Carpentry Services' registration as being cancelled on 02/01/2011

#### **Evidence provided for Brad Grey**

- *TAA40104 Certificate IV in Training and Assessment* – TAFE Queensland, July 2007
- *TAA50104 Diploma of Training and Assessment* – Australian College of Training and Employment, October 2010
- Statement of attainment *CPCCBC4051A Supervise asbestos removal* – Axiom College, November 2013
- Statement of attainment *CPCCDE3014A Remove non-friable asbestos* – BIGA Training, June 2012.
- Workplace Health and Safety Queensland – Bonded Asbestos Removal Certificate No. 02115244, Expired 18/05/2013
- Queensland Department of Employment and Industrial Relations letter dated 22/01/2014 regarding information for holders of transitional bonded asbestos removal certificate (Class B) confirming that licenses will be recognised up to 31 December 2014.

#### **Findings for Brad Gray**

Although Brad Gray holds a statement of attainment for *CPCCDE3014A Remove non-friable asbestos* and license for bonded asbestos removal that will be recognised by the Queensland Government Department of Employment and Industrial Relations until 31 December 2014, there is insufficient verifiable evidence given in the staff training record to confirm that he has workplace experience within the last two years in the competency area being delivered.

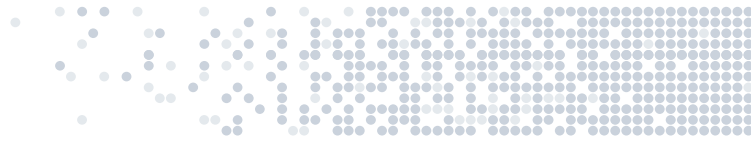
The most recent industry experience recorded in the staff training record is for the period from 2000 – 2007 where he was self-employed gaining domestic and commercial painting experience and that during January 2014 he carried out site work at Brighton Queensland involving residential painting with and asbestos seal requirement. The email from Patricia McGuigan to the Lead Auditor in response to the Lead Auditor's request for legible evidence informed the Lead Auditor that she had phoned Brad and that he confirmed that he has worked where asbestos is present and can identify it but has not installed or removed it.

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

- Provide verifiable evidence for Paul Lagosha and Brad Grey including dates, employer and the actual asbestos removal work undertaken within the last two years.

*Analysis of rectification evidence:*

- Evidence supplied
- Statutory declarations signed by the CEO attesting that:
  - Paul Lagosha has been voluntarily suspended from delivering training and assessment until he is able to provide sufficient evidence of industry currency for *CPCCDE3014A Remove non-friable asbestos*
  - Bradley Gray has withdrawn as a trainer/assessor for *CPCCDE3014A Remove non-friable asbestos* to assume his new role as CEO.
- The following evidence was provided for the newly appointed trainer/assessor, Greg Birchley:
  - Trainer matrix and trainer profile
  - CV
  - Copy of *TAE40110 Certificate IV in Training and Assessment*
  - Copy of *TAA50104 Diploma of Training and Assessment*
  - Builder/Contractor Licence for Builder – Low Rise, Building Services Authority



- Statement of Attainment for *CPC08 Construction, Plumbing and Services Training Package* Remove non-friable asbestos
- License to perform high risk work Class WP Boom type elevating platform

The RTO has supplied sufficient evidence to demonstrate that the newly appointed trainer/assessor meets the requirements for assessors detailed within the endorsed Assessment Guidelines of the *CPC08 Construction, Plumbing and Services Training Package*

The RTO is compliant.

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

**Original finding:** Not compliant

**Following rectification:** Compliant

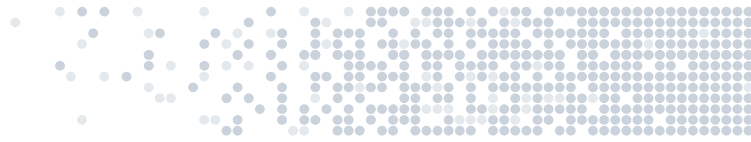
*Reasons for finding of non-compliance:*

The RTO supplied the following evidence for *CPC08 Construction, Plumbing and Services Training Package* Remove non-friable asbestos:

- Training and assessment strategy
- Workbook incorporating:
  - Asbestos removal control plan
  - Workshop activity checklist
- Assessment package incorporating:
  - Competency record form
  - Workshop/Workplace practical assessment
  - Theory assessment
  - Student feedback
- The workbook and the workshop activity do not provide sufficient information for assessors and learners about the context of the assessment used to assess the practical application of skills and knowledge during the workshop activity. For example the instructions on page 2 of the work book state “Your trainer will explain the activities and facilitate a group discussion to aid the completion of these forms and that the workshop activity guide explains the practical task”.

The workshop activity guide does not provide clear and specific details about the context of the practical assessment and the tasks to be performed. The instructions state “With the use of the supplied work instructions, asbestos register and asbestos removal control plan(ARCP) a site specific risk assessment in the form of a Job Safety Analysis (JSA) will need to be conducted and submitted by each participant. Each participant will also participate in the preparation of an emergency plan” and that “All work must be carried out to meet the Guidelines for Workplace Health and Safety Queensland, Code of Practice 2011 – How to Safely Remove Asbestos”.

There is no information about the context of the practical assessment and actual asbestos removal work to be performed and the number of assessments to be conducted to ensure that competency is able to be transferred to other circumstances and environments. Although there are 15 Safe work practices available that provide information about various aspects of working with asbestos the assessment guide does not identify the types of asbestos containing material to be removed eg. cladding, tiles etc. or the removal method to be used eg. wet or dry



method.

The activity guide lists activities under the unit's elements but does not clearly detail how the candidate would demonstrate they have performed to the required level as there is no link to the specific Safe work Practice or other information by which the quality of performance is to be judged.

- The RTO's learning and assessment strategy includes third party evidence validated by the employer, however Workshop/Workplace Practical Assessment is ambiguous in ensuring that employer validation will occur as the form states " Trainers and/or employers or their supervisors are to sign that the above criteria has been met to an acceptable industry standard" and only provides for the trainer to sign.

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

- Provide revised assessments for the workshop activity that include details about:
  - The context of the workshop/simulation activities and number of assessments to be conducted which will ensure that competency is able to be transferred to other circumstances and environments.
  - Information for assessors and candidates about how satisfactory performance is to be judged for each task listed either by inclusion in the checklist or by linking to the applicable Safe Work Practice.
- Provide revised workplace practical assessment checklists and instructions for use that will ensure that employers certify that the person has performed to workplace requirements.

*Analysis of rectification evidence:*

- Evidence supplied
  - Revised learning and assessment strategy
  - Assessor's pack incorporating practical assessment checklists.

The revised assessment materials now provide sufficient detail for assessors about the gathering of evidence during simulated and workplace assessment and the performance benchmarks for deciding whether a person is competent.

The RTO is compliant.

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

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

**Original finding:** Not audited

**Following rectification:** n/a

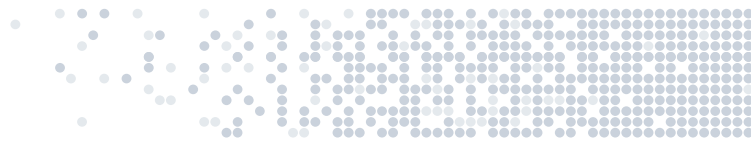
**16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.**

**Original finding:** Not audited

**Following rectification:** n/a

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





**about their rights and obligations.**

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a

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

**Original finding:** Not audited

**Following rectification:** n/a



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

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

**Original finding:** Not compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

- The CEO has not ensured the RTO continues to comply with the VET Quality Framework. Refer to non-compliances identified against SNR15.3, 15.4 and 15.5.

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

- Provide evidence demonstrating that non-compliances identified against SNR15.3, 15.4 and 15.5 have been rectified.

*Analysis of rectification evidence:*

The RTO has provided sufficient evidence to demonstrate compliance with requirements. Refer to SNR's 15.2, 15.3, 15.4, 15.5 and 24.1 for listing of the evidence provided and detail on findings.

The RTO is compliant.

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

**Original finding:** Not audited

**Following rectification:** n/a

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

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

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 20 Compliance with legislation**

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

**Original finding:** Not audited

**Following rectification:** n/a

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



**in vocational education and training.**

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 21 Insurance**

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

**Original finding:** Not audited

**Following rectification:** n/a

**SNR 22 Financial management**

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

**Original finding:** Not audited

**Following rectification:** n/a

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

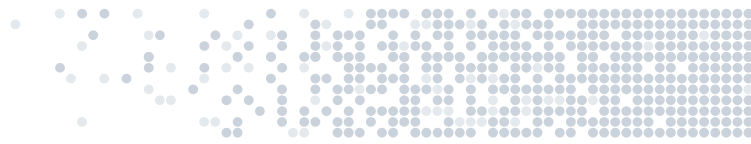
- (a) the total amount of all fees including course fees, administration fees, materials fees and any other charges;**
- (b) payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee;**
- (c) the nature of the guarantee given by the NVR registered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

**Original finding:** Not audited

**Following rectification:** n/a

**22.3 Where the NVR registered training organisation collects student fees in advance it must ensure it complies with one of the following acceptable options:**

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



future students) for tuition to be provided by the NVR registered training organisation to those students; or  
(e) (Option 5) the NVR registered training organisation has alternative fee protection measures of equal rigour approved by the National VET Regulator.

**Original finding:** Not audited

**Following rectification:** n/a

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

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

**Original finding:** Not audited

**Following rectification:** n/a

**23.2 The NVR registered training organisation must recognise the AQF and VET qualifications and VET statements of attainment issued by any other RTO.**

**Original finding:** Not audited

**Following rectification:** n/a

**23.3 The NVR registered training organisation must retain client records of attainment of units of competency and qualifications for a period of 30 years.**

**Original finding:** Not audited

**Following rectification:** n/a

**23.4 The NVR registered training organisation must provide returns of its client records of attainment of units of competency and VET qualifications to the National VET Regulator on a regular basis, as determined by the National VET Regulator. [no requirements currently exist]**

This element was not audited.

**23.5 The NVR registered training organisation must meet the requirements for implementation of a national unique student identifier. [no requirements currently exist]**

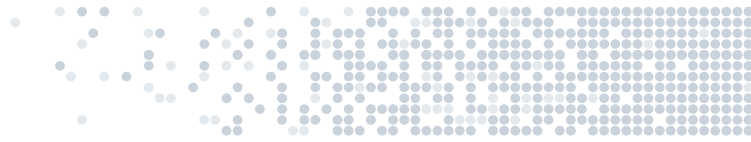
This element was not audited.

#### **SNR 24 Accuracy and integrity of marketing**

**24.1 The NVR registered training organisation must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its scope of registration.**

**Original finding:** Compliant

**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