

## Audit report – VET Quality Framework

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

#### ORGANISATION DETAILS

Organisation's legal name	<b>Pramukh Group of Companies Pty Ltd</b>
Trading name/s	Harward International College
RTO number	22332.
CRICOS number	03234B

#### AUDIT TEAM

Lead auditor	Robert East
Auditor/s	N/A
Technical adviser/s	N/A

#### AUDIT DETAILS

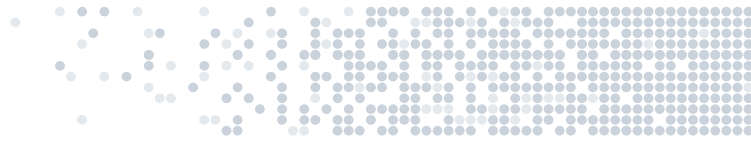
Application number/s	1029481, 1035147, 1038562	
Audit number/s	1001528	
Audit reason 1	Application - change	
Audit reason 2	Compliance - monitoring	
Audit reason 3	n/a	
Activity type	Site visit	
Address of site/s visited	Level 9, 14 Queens Rd, Melbourne Vic 3004	
Date/s of audit	13 -15 August 2013	
Organisation's contact for audit	Mr Mrugeshkumar Patel	Director
	mrugeshpatel@pramukh.com.a u	03 9866 7756
NVR standards audited	Selected Standards for Continuing Registration: 15.2 – 15.5, 16.1, 16.3 & 23.1	

#### BACKGROUND

The Pramukh Group of Companies Pty Ltd trading as Harward International College has been operating for approximately three years since its original registration in July 2010. The current CEO has been with the company since start up. The RTO is privately owned and has been registered as a CRICOS provider since November 2010.

The RTO is managed by the CEO Mrugesh Patel with assistance from:

- Muhammad Asim Khan – RTO Manager
- Internal Compliance group



- External compliance group
- Finance Manager
- Academic / Industry Board

The RTO utilises two external consultants, James Nash and Jim Richardson in its external compliance group and four industry representatives on its Academic / Industry Board to assist them with developing and validating training and assessment.

The RTO/organisation delivers classroom based training only from its Queens Rd premises in Melbourne.

The RTO's scope of registration includes:

- BSB40207 Certificate IV in Business
- BSB51107 Diploma of Management

and is currently seeking to add the the following

- BSB41307 Certificate IV in Marketing
- BSB51207 Diploma of Marketing
- BSB60507 Advanced Diploma of Marketing
- BSB60407 Advanced Diploma of Management

to its VET and CRICOS scope of registration and the

- BSB40212 Certificate IV in Business to just its VET scope of registration.

The RTO's current enrolments include:

- BSB40207 Certificate IV in Business - 54
- BSB51107 Diploma of Management - 37

The RTO/organisation offers its training and services as fee for service provider.

Total number of current enrolments with the RTO as at audit date: 91

<b>AUDIT SAMPLE</b>			
<b>Code</b>	<b>Qualification/Course/Unit name</b>	<b>Mode/s of delivery/assessment*</b>	<b>Current enrolments (If not yet on scope, record N/A)</b>
BSB51107	Diploma of Management	Face to face	37
BSB60407	Advanced Diploma of Management	Face to face	N/A
BSB51207	Diploma of Marketing	Face to face	N/A

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

<b>INTERVIEWEES</b>		
<b>Name</b>	<b>Position</b>	<b>Qualification/Course/Unit code/s</b>
Mrugesh Patel	CEO	All Courses
Muhammad Asim Khan	RTO Manager	All Courses
Jay Praful Kumar Patel	IT Support	All Courses



## ORIGINAL AUDIT FINDING AT TIME OF AUDIT

### Audit finding as at 15 August 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

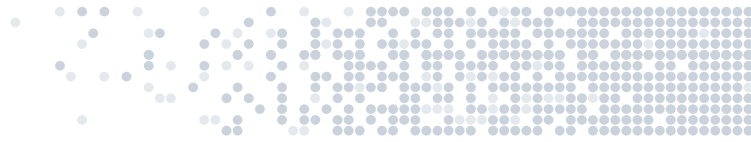
### Audit finding following analysis of additional evidence provided on 10/10/2013: Compliant

## AUDIT FINDING BY STANDARD

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



<b>SNR 15</b>	<b>The NVR registered training organisation provides quality training and assessment across all of its operations, as follows:</b>
<b>15.1</b>	<b>The NVR registered training organisation collects, analyses, and acts on relevant data for continuous improvement of training and assessment.</b>
<b>Original finding:</b>	Not audited
<b>Following rectification:</b>	n/a
<b>15.2</b>	<b>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.</b>
<b>Original finding:</b>	Compliant
<b>Following rectification:</b>	n/a
<b>15.3</b>	<b>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.</b>
<b>Original finding:</b>	Not compliant
<b>Following rectification:</b>	Compliant
<i>Reasons for finding of non-compliance:</i>	
<b>BSB60407 Advanced Diploma of Management</b> <i>BSBMGT617A Develop and implement a business plan</i> <i>And</i> <b>BSB51207 Diploma of Marketing</b> <i>BSBMKG515A Conduct a marketing audit</i>	
<p>The IBSA sourced student work books provided described additional reading materials for the students to read, yet this additional material was not available to the prospective students and no guidance was provided on how students could source this information. .</p>	
<i>In order to become compliant, the organisation is required to:</i>	
Provide students with a complete set of resources which will enable the delivery of a qualification so that it will meet the requirements of the Training Package, including how student can access additional resources and whether any cost is levied for these materials.	
<i>Analysis of rectification evidence:</i>	
The provider has:	
<ul style="list-style-type: none"><li>• Obtained appropriate resources from Precision Group and Small Print</li><li>• Added the book <i>Marketing in Black And White</i> to the student's book list</li><li>• Added the \$200 materials fee to the enrolment form</li><li>• Purchased a number of text books and made them available to students through a library borrowing system.</li></ul>	
The provider now meets this standard.	
<b>15.4</b>	<b>Training and assessment is delivered by trainers and assessors who: (a) have the necessary training and assessment competencies as determined by the</b>



**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 compliant

**Following rectification:** Compliant

*Reasons for finding of non-compliance:*

The provider did not establish the individual needs of the client as it was not establishing what previous qualifications the student had already obtained and providing suitable guidance on the benefits to the student of enrolling in the desired course. One student sampled (Davinder Singh) was found to already hold the BSB40207 Certificate IV in Business and yet he was enrolled in the same course by the provider. A number of other students sampled, held qualifications at the same AQF level or in the same business area and yet were enrolled without any investigation into the benefit to the student in enrolling in the new course or the application of credit transfer or RPL.

A sample of students enrolled in courses similar to those they already hold are shown in Attachment 1.

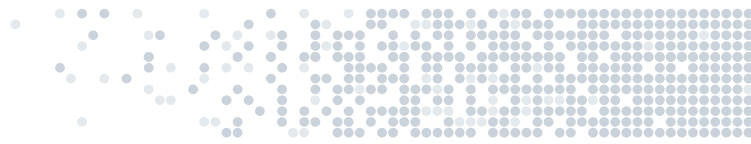
*In order to become compliant, the organisation is required to:*

- Explain the provider's current approach to establishing the needs of new students and why it allows prospective students to enrol in courses already obtained or courses which would have little vocational benefit to the student.
- Develop and implement a robust strategy to identify student study requirements and provide suitable guidance on the most appropriate course to meet their needs.

*Analysis of rectification evidence:*

The RTO provided an explanation of its enrolment process for Davinder Singh as well a signed statement from Davinder stating that he had not provided the accurate details to his previous training. The provider has also demonstrated that it has now implemented a robust system to ensure that all enrolling students are aware of the need:

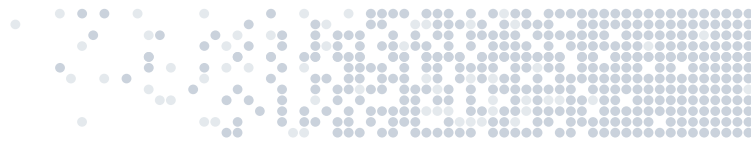
- to accurately declare their previous training history;



- to offer RPL and Credit transfer
- to clearly explain the courses they have on offer and their vocational advantages

The provider is now compliant with this standard.

<b>16.2</b>	<b>The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant data.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>16.3</b>	<b>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.</b>	<b>Original finding:</b> Compliant	<b>Following rectification:</b> n/a
<b>16.4</b>	<b>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.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>16.5</b>	<b>Learners receive training, assessment and support services that meet their individual needs.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>16.6</b>	<b>Learners have timely access to current and accurate records of their participation and progress.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>16.7</b>	<b>The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals addressed efficiently and effectively.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>SNR 17</b>	<b>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:</b>		
<b>17.1</b>	<b>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.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>17.2</b>	<b>The NVR registered training organisation uses a systematic and continuous improvement approach to the management of operations.</b>	<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a



<b>17.3</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>17.4</b>	<b>The NVR registered training organisation manages records to ensure their accuracy and integrity.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>SNR 18</b>	<b>The NVR registered training organisation has governance arrangements in place as follows:</b>		
<b>18.1</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>18.2</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>SNR 19</b>	<b>Interactions with the National VET Regulator</b>		
<b>19.1</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>SNR 20</b>	<b>Compliance with legislation</b>		
<b>20.1</b>	<b>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.</b>		
<b>Original finding:</b>	Not audited	<b>Following rectification:</b>	n/a
<b>20.2</b>	<b>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</b>		



**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.**

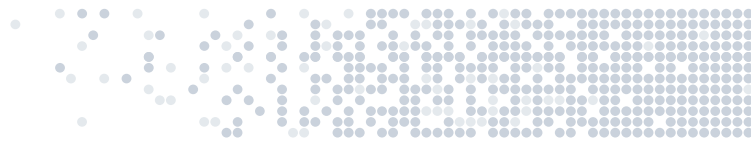
**Original finding:** Not audited

**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;~~ [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: Compliant

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]

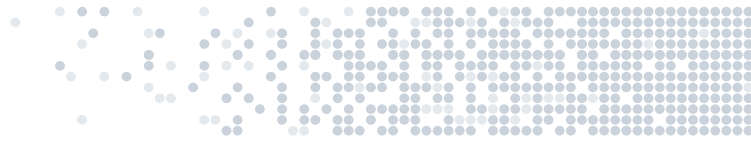
This element was not audited.

## 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



<b>24.2</b>	<b>The NVR registered training organisation must use the NRT logo only in accordance with its conditions of use.</b>
<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>SNR 25 Transition to Training Packages/expiry of VET accredited courses</b>	
<b>25.1</b>	<b>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.</b>
<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a
<b>25.2</b>	<b>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.</b>
<b>Original finding:</b> Not audited	<b>Following rectification:</b> n/a