

Audit report:

**R and P Gray Holdings Pty Ltd as Trustee
for The Gray Family Trust**

Date: 28 November 2016

Organisation details

Organisation's legal name:	R and P Gray Holdings Pty Ltd as Trustee for The Gray Family Trust
Trading name/s:	Matters in Gray
RTO number:	1685
CRICOS number:	02424D

Audit team

Lead auditor:	Christine Williams
Assistant/s:	Jen Addlington

Audit details

Application number/s:	RENVET0002829 (legacy 1103954)	
Audit number:	AUDREC0001544	
Audit reason	Application - renewal	
Address of site/s visited:	12 Mt Gravatt Capalaba Road, Upper Mount Gravatt, Qld	
Date/s of audit:	22 November 2016	
Organisation's contact for audit:	Anthony Gray graya@mattersingray.com.au	Director 07) 3349 6538

Clauses audited:

Marketing Recruitment	4.1
Enrolment	5.1, 5.2, 5.3, 7.3
Support and Progression	1.7
Training and Assessment	1.1, 1.2, 1.3, 1.8, 1.13-1.16
Completion	3.1
Use of Third Party providers	2.3, 2.4, 8.2

The following clauses were found to be not applicable at the audit site visit and were therefore not audited: 1.17 – 1.20.

Background

Summary of RTO organisation and management structure:

- Shareholders: Andrea Gray / Rodney and Patricia Gray.
- General Manager: Anthony Gray (Director)
- Management: Nicole Gislingham; Darryl Murray (Workplace delivery and resources)
Leah Gordon (Administration)

- College Staff: LauraPonton
MandyGoodyear
KateChristie
NeilRobinson
Rachael Monaghan
Roddy Machray

- Workplace Trainers: Leanne Beasley
Jenelle Arnott
Rozi Hams

- Administration staff: Vicki Beeston
Steff Kruick

Scope of RTOs registration:

- 5 x SHB qualifications for: Salon/hairdressing/barbering
- 3 x SIR qualifications for: Retail

Suburb and state of all delivery sites:

- L2/ 12 Mt Gravatt Capalaba Rd Upper Lt Gravatt, Qld
- Trade Training Centre – Trinity College Beenleigh (2 days per week), Qld
- YMCA School – Kingston / Northlakes Campus, Qld
- Brisbane Womens Correctional Centre (2 days per week), Qld

Third party usage:

- Work closely with Michael Hill Jeweller to deliver Retail traineeships to staff
- Partner with Convict Cutters to train SIH30111 apprentices in Launceston Tasmania
- Work with Roots Academy in Sri Lanka to conduct a small number of RPL assessments for Sri Lankan qualified hairdressers

Core clients/target groups:

- Hairdressing apprentices / school based trainees
- Fee based hairdressing / barber students
- Retail traineeships for specific corporate customer

Current business activities:

- Currently deliver apprenticeship training in SIH30111 in Hairdressing to approximately 400 apprentice across QLD
- Deliver a range of tailored one-day short courses with guest artists to the Hairdressing industry.
- Deliver SIH20111 Certificate II in Hairdressing in the Brisbane Women's Correctional Centre
- Deliver SIH20111 Certificate II in Hairdressing and SIR20102 Certificate II in retail to disengaged youth at YMCA schools at Kingston and Northlakes as well as students at Trinity College Beenleigh.

Training Revenue (Funded or fee for service):

- Hairdressing domestic fee for service students
- Hairdressing International students (CRICOS and RPL in India)
- QLD User Choice funded hairdressing / barber apprentices
- Tasmanian User Choice funded hairdressing apprentices
- QLD Certificate III Guarantee funded lower level training in Hairdressing
- QLD User Choice Retail traineeships
- Retail fee for service trainee's

Total number of current enrolments in RTO as at audit date:

- 714

In preparing the audit report, consideration has been given and reference made, where relevant, to:

- Information provided by students as part of a student survey or interview.
- Information provided directly by R and P Gray Holdings Pty Ltd as Trustee for The Gray Family Trust to ASQA
- Existing information and records held by ASQA concerning R and P Gray Holdings Pty Ltd as Trustee for The Gray Family Trust
- Information provided to ASQA's auditors and documentation reviewed during the site audit of R and P Gray Holdings Pty Ltd as Trustee for The Gray Family Trust conducted **on 22 November 2016**

- Other publically available information - including but not limited to, information published on the RTO's and third party websites.

Audit Sample

Code	Training products	Mode/s of delivery / assessment*	Current enrolments
SIR30212	Certificate III in Retail	Workplace/online	2 x WP Juice Boost; 200 online Michael Hill
SIR40212	Certificate IV in Retail Management	Online	49 Michael Hill
SHB30416	Certificate III in Hairdressing	Face to face college workplace	17 19
SHB30516	Certificate III in Barbering	Face to face college workplace	10 3

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

Interviewees

Name	Position	Training products
Leah Gordon	Admin Manager	n/a
Nicole Gislingham	College Operations Manager	n/a
Darryl Murray	Education Manager	SIR and SHB quals
Anthony Gray	Director	n/a

Findings

Audit finding: Minor non-compliance

Report completed by: Christine Williams

Date: 22 November 2016

- 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.

Audit finding by Practice

Practice	Standards 2015 Clauses	Original finding
Marketing/Recruitment	4.1,	Not compliant
Enrolment	5.1, 5.3, 7.3	Compliant
Enrolment	5.2	Not compliant
Support and Progression	1.7	Compliant
Training and Assessment	1.2, 1.3, 1.13-1.18, 1.20	Compliant
Training and Assessment	1.1, 1.8	Not compliant
Completion	3.1	Compliant
Use of Third Party arrangements	2.3, 8.2	Compliant

Use of Third Party arrangements	2.4	Not compliant
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About this Report

This report details findings against the *Standards for Registered Training Organisations 2015*.

Where evidence of non-compliance is identified, the '*Findings*' section of the report will document the issues that were considered in the formulation of a finding of non-compliance.

Action required by RTO

R and P Gray Holdings Pty Ltd as Trustee for The Gray Family Trust did not meet all requirements for clauses 1.1, 1.8, 5.3, 2.4.

Remedial action is required for the following training products:

- SIR30212 Certificate III in Retail Operations
- SIR40212 Certificate IV in Retail Management
- SHB30416 Certificate III in Hairdressing
- SHB30516 Certificate III in Barbering

The RTO is required to provide evidence that demonstrates:

Clauses 1.1, 1.8

- The RTO has corrected its training and assessment strategies, systems and practices to ensure all future students meet the requirements of the training products.
- The RTO has carried out remedial action to identify and address the impact the non-compliance may have caused to learners that were assessed in a manner that did not meet the requirements of the relevant training products. Remedial action should cover current students and those that were assessed within the past 3 months.

Clause 2.4, 4.1, 5.2

- The RTO has put in place appropriate processes to ensure its systematic monitoring of its own marketing of course information including its third party providers conducting assessment off shore, identify the currency of any superseded training product and that web sites accurately comply with the use of Australian logos in accordance with the VET Quality Framework (VQF) and the Australian Qualifications Framework (AQF).

Marketing/Recruitment Practices

Clause 4.1

Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
 - i) a learner will successfully complete a training product on its scope of registration;
 - or
 - ii) a training product can be completed in a manner which does not meet the requirements of [Clause 1.1](#) and [1.2](#); or
 - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.

Findings: Non-compliant

The following evidence was reviewed in relation to marketing and recruitment:

- Information published on the RTO's website as at 22 November 2016
- Electronic copies of course flyers for training products provided by the RTO prior to audit.

The RTO's marketing practices are not compliant with the requirements of the *Standards for RTOs 2015* as marketing is not accurate and factual in all cases.

Evidence of non-compliant marketing practice includes:

The RTO's marketing on its website incorrectly records training products on its scope of registration. On the webpage for workshops the following training products are incorrectly titled as they do not include the qualification codes:

Code Certificate II in Hairdressing

Code Certificate III in Hairdressing

- a. The RTO refers to a superseded qualification SIH20111 Certificate II in Hairdressing for the school program.
- b. The course flyer provided by the RTO does not clearly identify the qualification outcome for the SHB30516 Certificate III in Barbering - Partial program (8 Months).

These practices and behaviours are non-compliant with clause 4.1 of the *Standards for RTOs 2015*

Enrolment

Clause 5.1

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides advice to the prospective learner about the training product appropriate to meeting the learner's needs, taking into account the individual's existing skills and competencies.

Clause 5.2

Prior to enrolment or the commencement of training and assessment, whichever comes first, the RTO provides, in print or through referral to an electronic copy, current and accurate information that enables the learner to make informed decisions about undertaking training with the RTO and at a minimum includes the following content:

- a) the code, title and currency of the training product to which the learner is to be enrolled, as published on the National Register;
- b) the training and assessment, and related educational and support services the RTO will provide to the learner including the:
 - i) estimated duration;
 - ii) expected locations at which it will be provided;
 - iii) expected modes of delivery;
 - iv) name and contact details of any third party that will provide training and/or assessment, and related educational and support services to the learner on the RTO's behalf; and
 - v) any work placement arrangements.
- c) the RTO's obligations to the learner, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.
- d) the learner's rights, including:
 - i) details of the RTO's complaints and appeals process required by [Standard 6](#); and
 - ii) if the RTO, or a third party delivering training and assessment on its behalf, closes or ceases to deliver any part of the training product that the learner is enrolled in;
- e) the learner's obligations:
 - i) in relation to the repayment of any debt to be incurred under the VET FEE-HELP scheme arising from the provision of services;
 - ii) any requirements the RTO requires the learner to meet to enter and successfully complete their chosen training product; and
 - iii) any materials and equipment that the learner must provide; and
- f) information on the implications for the learner of government training entitlements and subsidy arrangements in relation to the delivery of the services.

Findings: Non-compliant

The following evidence was reviewed in relation to the RTO's advice provided to prospective students:

The RTO's marketing, including its third party provider off shore in Sri Lanka, does not comply with Clause 5.2 a) in that it does not identify the currency of the training product. The products advertised identify the qualification and code of the current but not the superseded qualifications.

The RTO's fee information, in relation to the information provided to the learner for the purchase of the \$500 kit, does not comply with Clause 5.2 e)iii) in that it does not clearly identify the purchase options for the learner. As confirmed by the RTO at audit the purchase of the kit is optional

The Course flyer '*see your future in.....*' lists a cost of \$500 for the resource kit whereas the course guide brochure lists equipment (guide only) to the resources required to complete the Certificate III in Hairdressing.

These practices and behaviours are non-compliant with Clause 5.2 of the *Standards for RTOs 2015*

Clause 5.3

Where the RTO collects fees from the individual learner, either directly or through a third party, the RTO provides or directs the learner to information prior to enrolment or the commencement of training and assessment, whichever comes first, specifying:

- a) all relevant fee information including:
 - i) fees that must be paid to the RTO; and
 - ii) payment terms and conditions including deposits and refunds;
- b) the learner's rights as a consumer, including but not limited to any statutory cooling-off period, if one applies;
- c) the learner's right to obtain a refund for services not provided by the RTO in the event the:
 - i) arrangement is terminated early; or
 - ii) the RTO fails to provide the agreed services.

Findings:

- The RTO has met all requirements.

Clause 7.3

Where the RTO requires, either directly or through a third party, a prospective or current learner to prepay fees in excess of a total of \$1500 (being the threshold prepaid fee amount), the RTO must meet the requirements set out in the Requirements for Fee Protection in Schedule 6.

Findings:

- The RTO has met all requirements.

Support and Progression

Clause 1.7

The RTO determines the support needs of individual learners and provides access to the educational and support services necessary for the individual learner to meet the requirements of the training product as specified in training packages or VET accredited courses.

Findings:

- The RTO has met all requirements.

Training and Assessment

Clause 1.1

The RTO's training and assessment strategies and practices, including the amount of training they provide, are consistent with the requirements of training packages and VET accredited courses and enable each learner to meet the requirements for each unit of competency or module in which they are enrolled.

Clause 1.2

For the purposes of [Clause 1.1](#), the RTO determines the amount of training they provide to each learner with regard to:

- a) the existing skills, knowledge and the experience of the learner;
- b) the mode of delivery; and
- c) where a full qualification is not being delivered, the number of units and/or modules being delivered as a proportion of the full qualification.

Findings: Non-compliant

SIR30212 Certificate III in Retail Operations

SIR40212 Certificate IV in Retail Management

SHB30416 Certificate III in Hairdressing

SHB30516 Certificate III in Barbering

The following evidence was reviewed in relation to training and assessment:

- Completed student assessments
- Training and assessment strategies
- Master assessment tools
- RPL tools

The RTO's training and assessment strategies and practices are not consistent with the requirements of the relevant training products as identified in Clause 1.8 because:

The RTO's current training and assessment practices do not ensure sufficient evidence is collected to demonstrate that each learner has met the requirements for each unit of competency or qualification in which they are enrolled. (refer non-compliance noted at 1.8 within this report).

These practices and behaviours are non-compliant with Clause 1.1 of the *Standards for RTOs 2015*

Clause 1.3

The RTO has, for all of its scope of registration, and consistent with its training and assessment strategies, sufficient:

- a) trainers and assessors to deliver the training and assessment;
- b) educational and support services to meet the needs of the learner cohort/s undertaking the training and assessment;
- c) learning resources to enable learners to meet the requirements for each unit of competency, and which are accessible to the learner regardless of location or mode of delivery; and

d) facilities, whether physical or virtual, and equipment to accommodate and support the number of learners undertaking the training and assessment.

Findings:

- *The RTO has met all requirements.*

Clause 1.8

The RTO implements an assessment system that ensures that assessment (including recognition of prior learning):

- a) complies with the assessment requirements of the relevant training package or VET accredited course; and**
- b) is conducted in accordance with the Principles of Assessment contained in Table 1.8-1 and the Rules of Evidence contained in Table 1.8-2.**

Table 1.8.1 Principles of Assessment

Fairness	The individual learner's needs are considered in the assessment process. Where appropriate, reasonable adjustments are applied by the RTO to take into account the individual learner's needs. The RTO informs the learner about the assessment process, and provides the learner with the opportunity to challenge the result of the assessment and be reassessed if necessary.
Flexibility	Assessment is flexible to the individual learner by: reflecting the learner's needs; assessing competencies held by the learner no matter how or where they have been acquired; and drawing from a range of assessment methods and using those that are appropriate to the context, the unit of competency and associated assessment requirements, and the individual.
Validity	Any assessment decision of the RTO is justified, based on the evidence of performance of the individual learner. Validity requires: assessment against the unit/s of competency and the associated assessment requirements covers the broad range of skills and knowledge that are essential to competent performance; assessment of knowledge and skills is integrated with their practical application; assessment to be based on evidence that demonstrates that a learner could demonstrate these skills and knowledge in other similar situations; and judgement of competence is based on evidence of learner performance that is aligned to the unit/s of competency and associated assessment requirements.
Reliability	Evidence presented for assessment is consistently interpreted and assessment results are comparable irrespective of the assessor conducting the assessment.

Table 1.8.2 Rules of Evidence

Validity	The assessor is assured that the learner has the skills, knowledge and attributes as described in the module or unit of competency and associated assessment requirements.
Sufficiency	The assessor is assured that the quality, quantity and relevance of the assessment evidence enables a judgement to be made of a learner's competency.
Authenticity	The assessor is assured that the evidence presented for assessment is the learner's own work.
Currency	The assessor is assured that the assessment evidence demonstrates current competency. This requires the assessment evidence to be from the present or the very recent past.

Findings: Non-compliant

SIR30212 Certificate III in Retail Operations
SIR40212 Certificate IV in Retail Management
SHB30416 Certificate III in Hairdressing
SHB30516 Certificate III in Barbering

The following evidence was reviewed in relation to training and assessment for the above qualifications:

- Completed student assessments
- Training and assessment strategies
- Master assessment tools
- RPL tools

The RTO's training and assessment practices are not compliant with the requirements of the *Standards for RTOs 2015* as assessment is not conducted in accordance with the Principles of assessment and the Rules of Evidence.

Evidence of non-compliant assessment practices include:

STUDENT ASSESSMENT

SIR30212 Certificate III in Retail Operations

Traineeships Michael Hill Jewellers:

All assessment is conducted through an enterprise online product. The RTO is not ensuring that there is sufficient evidence collected for the purpose of the practical observations which are conducted by Michael Hills' supervisors. Whilst the online product outlines very clearly what the task/s are to be, the RTO does not have access to the portal to assess the validity of the practical assessment. This process allows for the training and assessment to be fully conducted by Michael Hill which equates to the RTO relying totally on the relevant shop supervisor/s to conduct all practical components and make a judgement on a learner's competence. This allows for the sole discretion of the judgement of the observable behaviours to be made by the enterprises' supervisory staff.

SIR40212 Certificate IV in Retail Management (Review of 4 student assessments)

SHB30416 Certificate III in Hairdressing (Review of 4 student assessments)

SHB30516 Certificate III in Barbering (Review of 1 student assessment)

The RPL instrument provided by the organisation did not capture sufficient evidence to determine the learner meets all requirements of the relevant training package. The RTO has developed a checklist with general instructions for the assessor and learner; however, the lack of guidelines for both assessor and learner allows for the sole discretion of the assessor to determine the benchmark for a satisfactory outcome and does not ensure consistency in the decision making process amongst assessors for the minimum variable required as a response.

The RTO's training and assessment practices are not compliant with the requirements of the *Standards for RTOs 2015* as assessment is not conducted in accordance with the Principles of assessment and the Rules of Evidence.

These practices and behaviours are non-compliant with Clause 1.8 of the *Standards for RTOs 2015*

Clause 1.13

In addition to the requirements specified in [Clause 1.14](#) and [Clause 1.15](#), the RTO's training and assessment is delivered only by persons who have:

- a) vocational competencies at least to the level being delivered and assessed;**
 - b) current industry skills directly relevant to the training and assessment being provided;**
- and**

c) current knowledge and skills in vocational training and learning that informs their training and assessment.

Industry experts may also be involved in the assessment judgement, working alongside the trainer and/or assessor to conduct the assessment.

Clause 1.14

The RTO's training and assessment is delivered only by persons who have:

- a) ~~prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1, or demonstrated equivalence of competencies; and~~
- b) from 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 of Schedule 1.

Clause 1.15

Where a person conducts assessment only, the RTO ensures that the person has:

- a) ~~prior to 1 January 2016, the training and assessment qualification specified in Item 1 or Item 2 or Item 3 of Schedule 1, or demonstrated equivalence of competencies; and~~
- b) from 1 January 2016, Item 1 or Item 2 or Item 3 of Schedule 1.

Clause 1.16

The RTO ensures that all trainers and assessors undertake professional development in the fields of the knowledge and practice of vocational training, learning and assessment including competency based training and assessment.

Findings: Non-compliant

The organisation did not provide evidence that its assessor, Shyamani Priyanthi who conducts assessment only, off shore in Sri Lanka, has met the requirements under Clause 1.16 to undertake professional development in the fields of the knowledge and practice of vocational training including competency based assessment within an Australian vocation education assessment framework. The RTO only provided evidence of professional development within the context and requirements of Sri Lanka and its vocational system.

These practices and behaviours are non-compliant with Clause 1.16 of the *Standards for RTOs 2015*

Completion

Clause 3.1

The RTO issues AQF certification documentation only to a learner whom it has assessed as meeting the requirements of the training product as specified in the relevant training package or VET accredited course.

Findings:

- The RTO has met all requirements.

Use of Third Party arrangements

Clause 2.3

The RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.

Clause 2.4

The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf, and uses these to ensure that the services delivered comply with these Standards at all times.

Clause 8.2

The RTO ensures that any third party delivering services on its behalf is required under written agreement to cooperate with the VET Regulator:

- a) by providing accurate and factual responses to information requests from the VET Regulator relevant to the delivery of services; and
- b) in the conduct of audits and the monitoring of its operations.

Findings: **Non-compliant**

The RTO has a systematic approach to ensuring the services delivered by its offshore third party hairdressing provider, Roots Academy, is conducting valid recognition of prior learning RPL assessments; however, its monitoring process did not identify that the third party provider's web site is displaying the Australian Qualifications Framework (AQF) logo which is only approved for use by registered training organisations (RTOs) and not their third party providers, unless permission is gained, plus the third party web site does not identify the currency of the qualification/s it assesses for the RTO (refer Clause 5.2 a) and that the web site also includes wording which could lead a prospective learner to misinterpret the free training offered by the offshore provider as being provided by the RTO when the agreement is for assessment only.

These practices and behaviours are non-compliant with Clause 2.4 for the *Standards for RTOs 2015*.