



ORGANISATION DETAILS

Organisation's legal name	malekhu investments Pty ltd
Trading name/s	Queensford College
RTO number	31700P
CRICOS number	13010G

AUDIT TEAM

Lead auditor	Ms Emma Betts
Auditor/s	Ms Karen No...
Technical expert/s	n/a

AUDIT DETAILS

Application number/s	1042223
Audit number/s	1003770
Audit reason 1	Application - renewal
Audit reason 2	n/a
Audit reason 3	n/a
Activity type	Site visit
Address of site/s visited	Level 3, 350 Queen Street, Brisbane City
Dates of audit	06-07/2019
Organisation's contact for audit	Mr Bikash Bhandari, Principal Executive Officer b.bhandari@queensford.edu.au 07 3221 1626
NVR standards audited	SNR 15, 16, 17, 18, 20, 22.2

BACKGROUND

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

- While the organisation has a lease to deliver over two levels at Brisbane, delivery has only been undertaken on one floor due to limited space.
 - To date, the organisation's core clients have been international students. The organisation advised it will be moving to a new premises in Brisbane in the next few months. The organisation has advised it will be moving to a new premises in Brisbane in the next few months. The organisation has advised it will be moving to a new premises in Brisbane in the next few months.
 - The organisation does not have any partnering relationships.
- Total number of current enrolments in RTO as at 31/07/2013: 150

AUDIT SAMPLE

Code	Qualification/Course/Unit code	Delivery mode	Enrolments (If not yet on scope, record N/A)
BSP20412	Certificate II in Business	Face to face	0
BSB51207	Diploma of Marketing	Face to face	0
FNS50210	Certificate IV in Accounting	Face to face	0
FNS50210	Diploma of Accounting	Face to face	0

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

INTERVIEWEES

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

ORIGINAL AUDIT FINDINGS

Audit finding as at 31/07/2013: Significant non-compliance

- The level of non-compliance considers the potential 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 ADDITIONAL EVIDENCE

Audit finding following analysis of additional evidence

AUDIT FINDING BY STANDARD

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

SNR 15 The NVR registered training organisation provides quality training and assessment across all relevant training packages.

15.2 The NVR registered training organisation collects, analyses and acts on relevant feedback for continuous improvement.

Original finding:

15.2 The NVR registered training organisation provides quality training and assessment with industry.

Original finding: Not compliant

Reasons for finding:

BSB20112 Certificate II in Business

assessment plan which did not meet the requirements of the BSB20112 Certificate II in Business Training Package. The assessment plan stated that the assessment "conducted by the assessor" would not ensure delivery would be undertaken by trainers and assessors with relevant vocational competencies for the qualification.

In order to ensure compliance, the following action is required to:

BSB20112

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

Analysis of compliance evidence:

BSB20112 Certificate II in Business

- The organisation provided a revised strategy for training and assessment which assessed requirements to ensure delivery would be undertaken by trainers and assessors with relevant vocational competencies for the qualification.

15.3 Staff, facilities, equipment and training resources of the registered training organisation are consistent with the requirements of the Training Package or VET accredited course and the NVR registered training organisation provides training and assessment with industry.

Original finding: Not compliant

Following rectification: Compliant

Reasons for finding of non-compliance:

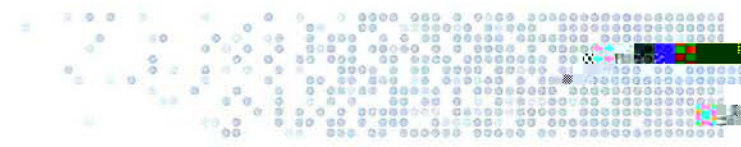
BSB20112 Certificate II in Business

BSB51107 Diploma of Management

BSB51207 Diploma of Marketing

BSB60507 Advanced Diploma of Marketing

- As non-compliance was identified, the organisation ensured that training and assessment staff were consistent with the requirements of the Training Packages.



Evidence did not clearly demonstrate how these people are or attain competence in the vocational qualification, including current knowledge and skills relevant to delivery of the qualification.

- o A trainer matrix was provided (information for this qualification last updated in 2008) which referenced [www.training.gov.au](#), "Australian Industry Skills Framework for Management, in India. While the matrix did list evidence against each unit of competency, the information does not demonstrate how the employment duties confirmed vocational competence in the qualification. In addition, the matrix did not provide evidence of current skills relevant to the training/assessment being undertaken and specifically to industry in Australia.

BSB51207 Diploma of Marketing
BSB60507 Advanced Diploma of Marketing

- o Evidence of current industry skills directly relevant to the training/assessment being undertaken. A trainer matrix was provided (information for this qualification last updated in 2008). The matrix did not provide further evidence to demonstrate current industry skills directly relevant to the training/assessment being undertaken since that time.

In order to:

- o **BSB51207 Diploma of Marketing**
 - o Provide evidence of its relevance to the current industry skills of a person meeting the requirements of the qualification, including:
 - o training and assessment materials as determined by the Training and Assessment Council;
 - o relevance of vocational competencies at least to the Certificate II level;
 - o current industry skills directly relevant to the qualification;
 - o development of vocational education and training knowledge and skills, as well as current industry skills directly relevant to the qualification.

BSB51207 Diploma of Marketing

- o Provide evidence that Lucy Pandya has relevant current industry skills directly relevant to the training/assessment being undertaken, and that she has continued to develop her industry competency.

BSB51207 Diploma of Marketing
BSB60507 Advanced Diploma of Marketing

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

Analysis:

BSB20112 Certificate II in Business

- o The organisation nominated Matthew Kelly as its trainer and assessor. The organisation provided:
 - o Training and Assessment Materials for Training and Assessment, Russo Institute Australia 19/12/2011
 - o Various certificates and qualifications issued by the Business Administration Institute of Management
 - o Resume which included roles in operations, corporate training and assessment
 - o Trainer, Russo Institute of Management
- o Evidence of current industry skills directly relevant to the training/assessment being undertaken. The matrix did not provide evidence of current industry skills directly relevant to the training/assessment being undertaken. Mr Kelly had participated in a recent induction with MIA, which included updating VET knowledge and skills, and training and assessment competence.

- o Attendance

BSB51107 Diploma of

- For Lucy Pandya, the organisation provided:
 - o Statement of training and assessing
 - o Certificate of achievement
 - o Certificate of achievement – Principles of Project Management
 - o Certificate of Achievement – Management for a Competitive Edge, 30/07/2013
 - o Updated resume
 - o Identification Ms Pandya was responsible for recruitment, project management, sustainable business practices
 - o Subscription to various business magazines and professional bodies

The information demonstrated Ms Pandya has current industry skills directly relevant to the training/assessment to be undertaken.

BSB5125 Diploma of Marketing

BSB60507 Advanced Diploma of Marketing

- For Ting Jin (Amanda), the organisation provided:
 - o Notification of enrolment in Master of Marketing
 - o Attendance and participation in various VET professional development workshops
 - o Trainer skills matrix to demonstrate vocational competency, industry currency, and industry skills for each

The information demonstrated Ms Jin has current industry skills directly relevant to the training/assessment to be undertaken.

15.5 Assessment including Recognition of Prior Learning (RPL):

- (a) meets the requirements of the relevant rules of evidence;
- (b) is conducted in accordance with the principles of assessment and the rules of evidence;
- (c) meets work practice and, where relevant, regulatory requirements; and
- (d) is systematically validated.

Original finding: Not compliant

Reasons for finding or non-compliance:

BSB20112 Certificate II in Business

BSBCUS201B Deliver a service to customers

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

BSBSEC201A Participate in business

- Assessment did not meet the requirements of the BSB07 that evidence collected would meet the rules of evidence, specifically valid and sufficient evidence.
 - o The tools did not address all of the required knowledge, required skills, critical aspects of assessment, or the context-specific resources for assessment.

- o The "assessor guide" did not provide the assessment decision-making rules for all tools to judge the quality or performance; to ensure assessment would be conducted consistently, and to ensure assessment would be conducted consistently;
- o Where direct observation would be undertaken, the evidence criteria (an observation checklist) was a copy of the performance criteria and did not describe the specific tasks to be administered to the student; consequently the decision-making rules to judge the quality of performance and ensure performance standards consistent with the requirements of the unit.

BSB6007 Advanced Diploma of Marketing

BSBMKG603B Manage the marketing process

- Assessment did not meet the requirements of the BSB07 Training Package and did not ensure evidence.
 - o The tools did not address all of the elements and performance criteria, critical aspects of assessment, context of and specific resources for assessment, or range of assessment tasks;
 - o The tools were not addressed to the appropriate AQF level and did not require the student to demonstrate the outcomes of the unit in the context of the marketing process and marketing personnel within an organisation; most assessment tasks were not clearly described;
 - o The assessment tool four (presentation) did not clearly describe the tasks to be undertaken, and did not provide an indication of the evidence to be gathered from the student.

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

BSB20112 Certificate II in Business

BSBCUS201B Deliver a service to customers

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

BSBSUS201A Participate in environmental/sustainable practices

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

BSB60507 Advanced Diploma of Marketing

BSBMKG603B Manage the marketing process

- Provide its suite of assessment tools to demonstrate:
 - o assessment addresses all the requirements of the BSB07 Training Package, including the elements and performance criteria, required skills, critical aspects of assessment, context of and specific resources for assessment;
 - o assessment tasks are addressed to the appropriate AQF level and would ensure valid and sufficient evidence would be gathered;

- o sufficient instructions are provided for a student to understand the context of the assessment, the tasks to be undertaken and an outline of the evidence to be gathered from the student.

Analysis of rectification evidence:

BSB20112 Certificate in Business

BSBCU

- The organisation provided new assessment tools from those at audit.
 - o Record of assessment
 - o Instructions for students
 - o Assessment cover pages
 - o Assessment task 1 and marking guide
 - o Assessment task 2 and marking guide (role play)
 - o Assessment task 3 and marking guide (short answer questions)
 - o Assessor guide instructions
 - o Training resources
 - o Validation summary

Assessment met the requirements of the BSB07 Training Package and addressed all of the required knowledge and skills. The assessment provided the assessment decision making rules to judge the quality of performance. Assessment did not include direct observation.

BSBSUS201A Participate in environmental sustainability

- The organisation provided new assessment tools from those at audit.
 - o Record of assessment
 - o Instructions for students
 - o Assessment cover pages
 - o Assessment task 1 and marking guide (case study short answer questions)
 - o Assessment task 2 and marking guide (role play)
 - o Assessment task 3 and marking guide (short answer questions)
 - o Assessor guide instructions
 - o Training resources
 - o Validation summary

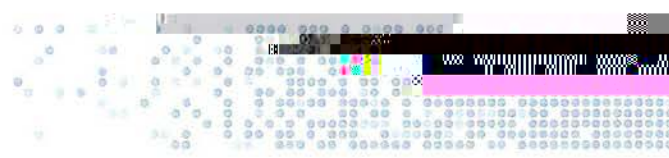
Assessment met the requirements of the BSB07 Training Package and addressed all of the required knowledge, required skills, critical aspects of assessment, and the content of need specific resources. The assessment provided the assessment decision making rules to judge the quality of performance. Assessment did not include direct observation.

BSB60507 Advanced Diploma of Marketing

BSBMKG603B Manage the marketing process

- The organisation provided new assessment tools from those at audit.
 - o Record of assessment
 - o Instructions for students
 - o Assessment cover pages
 - o Assessment task 1 and marking guide (role play)
 - o Assessment task 2 and marking guide (role play)
 - o Assessment task 3 and marking guide (review the implementation and progress of a marketing plan)
 - o Assessor guide instructions
 - o Training resources
 - o Validation summary

Assessment met the requirements of the BSB60507 Training Package and addressed all of the required knowledge, required skills, critical aspects of assessment, and the content of need specific resources for assessment. The assessment provided the assessment decision making rules to judge the quality of performance. Assessment did not include direct observation. The tools were supplied to the assessor.



SNR 16 The NVR registered training organisation adheres to the following standards, as follows:

16.1 The NVR registered training organisation provides services to meet clients' needs.
 Original finding: Compliant Following rectification: n/a

16.2 The NVR registered training organisation continuously improves client services by collecting, analysing and acting on relevant client data.
 Original finding: Compliant Following rectification: n/a

16.3 Before clients enrol or enter into an agreement with a registered training organisation, the organisation informs them about the training, assessment and support services available, and about their rights and obligations.
 Original finding: Compliant Following rectification: n/a

16.4 The NVR registered training organisation engages staff in the development, delivery and monitoring of training and assessment.
 Original finding: Compliant Following rectification: n/a

16.5 Learners receive training, assessment and support services that meet their individual needs.
 Original finding: Compliant Following rectification: n/a

16.6 Learners have timely access to current and accurate records of their participation and progress.
 Original finding: Compliant Following rectification: n/a

16.7 The NVR registered training organisation provides appropriate mechanisms and services for learners to have complaints and appeals resolved.
 Original finding: Compliant Following rectification: n/a

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

17.1 The NVR registered training organisation's management or its operations ensures clients receive the services detailed in the registration agreement.
 Original finding: Compliant Following rectification: n/a



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

Original finding:

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

Original finding:

17.4 The NVR registered training organisation manages its resources to ensure their accuracy and integrity.

Original finding:

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

18.1 The NVR registered training organisation's Chief Executive Officer confirms 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:

Reasons for finding of non-compliance:

- The non-compliances identified demonstrated the organisation's Chief Executive Officer had not ensured compliance with the VET Quality Framework.

In order to:

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

Analysis of remedial evidence:

- The organisation provided evidence to satisfactorily address the non-compliances identified at audit.

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:

SNR 19 Interactions with the National VET Regulator

19.1 The NVR registered training organisation interacts with the National VET Regulator: (a) in the conduct of audits and the monitoring of its operations.



(e) the organisation's records;

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 holds an unconditional guarantee from a Commonwealth or 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 must ensure 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 fees is not yet to be delivered;
- (d) (Option 4) the NVR registered training organisation holds an unconditional 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 fees to be provided to those students; or
- (e) (Option 5) the NVR registered training organisation has alternative fee protection measures of equivalent approval by the national VET Regulator. [option 5 not currently available]

Original finding: Not audited Following rectification: n/a

SNR 23 Certification, issuance and recognition of qualifications and 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 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 the NRT logo requirements.

Original finding: Not audited Following rectification: n/a

23.2 The NVR registered training organisation must record and report to the VET Regulator and VET Staff:

Original finding: Not audited Following rectification: n/a

23.3 The NVR registered training organisation must maintain records 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 ret



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 accurate and consistent with the conditions of registration.
 Original finding: Not audited Following rectification: n/a

24.2 The NVR registered training organisation must use the NRT logo only in accordance with its conditions of registration.
 Original finding: Not audited

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 or are voluntarily registered to continue to deliver currently endorsed Training Packages.
 Original finding: Not audited

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