

AQTF Essential Conditions and Standards for Continuing Registration AUDIT REPORT

RTO: Creative's New Edge Pty Ltd

Audit Date: 17 & 18 December 2013

RTO DETAILS			
RTO Name	Creative's New Edge Pty Ltd	RTO Number	21436
Address	Level 1, 60A Albert Street, PRESTON, VIC, 3072		
	Website	http://www.creativesnewedge.com.au	
Registration Contact	Ms Christine Lizzul-Nicolini		
Phone Number	(03) 9484 1889	Email	educate@creativesnewedge.com.au
Student Numbers	2012 – 54 enrolments		
AUDIT TEAM			
Lead Auditor	Andrea Bateman	Auditor/s	
Technical Advisor/s		Observer/s	
REGISTERING BODY DETAILS			
Contact Person	Emma Hickingbotham		
Phone Number	9032 1562	Email	vet.audit@edumail.vic.gov.au
AUDIT DETAILS			
Type of Audit	Renewal		
Conditions audited	1, 3, 4, 6, 7, 8, 9. <i>(Conditions 2 & 5 are not required to be audited, see page 3 below)</i>		
Standards audited	1.1, 1.2, 1.3, 1.4, 1.5.	2.1, 2.2, 2.3, 2.4, 2.5, 2.6, 2.7	3.1, 3.2, 3.3, 3.4
Audit Date/s	17 & 18 December 2013		
Other audit notes	<p>The audit identified a range of non-compliances related to its operations; however, in many instances the underlying issues are interrelated and include:</p> <ul style="list-style-type: none"> • Inaccurate and out-of-date information and processes • Inadequate assessment tools and validation processes • Lack of identification, as well as implementation and monitoring of continuous improvement actions. 		
ACCOMPANYING REPORTS			
VRQA Guidelines Audit Report			Yes
VRQA Guidelines – Re-registration Checklist			No

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FOCUS OF AUDIT		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
TGA Code	Qualification/Unit of Competence/Accredited Course (as per TGA)	Delivery Site
SIB20210	Certificate II in Nail Technology	Preston
SIB30110	Certificate III in Beauty Services	Preston

INTERVIEWEE/S: Staff name and position; employer name and position; students by program	
Mrs Christine Lizzul-Nicolini	Executive Director
Nicole Moore	Trainer
Manal Murad	Trainer
KellyAnn Hrstic	Trainer

PERMANENT DELIVERY SITES:
<p>Do the RTO's permanent delivery sites match the information provided by the VRQA?</p> <p><input type="checkbox"/> Yes, no further information required.</p> <p><input checked="" type="checkbox"/> No, please provided amended details below:</p> <p>The RTO has now leased the Ground Floor of 60A Albert St Preston, in addition to Level 1. The Ground Floor's main purpose is for industry supplies, but it could be utilised as training in terms of product awareness. The office for the business is now on the Ground Floor with Level 1 dedicated to training facilities.</p>

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AUDIT SUMMARY

Conditions of Registration		Compliant	Non-compliant	Not audited
1	Governance 1.1 CEO must ensure the RTO complies with relevant conditions, standards and guidelines 1.2 Fit & Proper Persons Tests 1.3 Input of Trainers and Assessors in senior management decision making		✓	
2	Interactions with the Registering Body			✓
3	Compliance with Legislation		✓	
4	Insurance		✓	
5	Financial Management			✓
6	Certification & Issuing of Qualifications & Statements of Attainment		✓	
7	Recognition of Qualifications Issued by other RTOs		✓	
8	Accuracy and Integrity of Marketing		✓	
9	Transition to Training Packages/Expiry of Accredited Courses		✓	

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Summary of non-compliances – Conditions of Registration

The RTO was non-compliant with Conditions 1, 3, 4, 6, 7, 8 and 9.

Condition 1

The RTO was non-compliant with this Condition as:

- Organisational chart outlines key positions and nominates personnel. Position Descriptions have been developed for Executive Director, Finance Manager, Administration Manager, Quality Manager, Training Manager, and Educator – but not for Senior Officer (which is noted on the organisational chart).
- This audit report illustrates that the RTO does not comply with all aspects of the AQTF, thus governance processes are not effective and the Condition has not been complied with.

Condition 3

The RTO was non-compliant with this Condition as information provided to students and staff in relation to legislation was incomplete and/or outdated.

Condition 4

The RTO is non-compliant with this Condition as the Commercial Business insurance for Creative's New Edge Pty Ltd is for the trading name of CNE Beauty Salon Supplies, which means that the training arm of the organisation is not covered by business insurance.

Condition 6

The RTO is non-compliant with the Condition as the sample Qualification (and accompanying statement of results) and Statement of Attainment were inaccurate. Samples indicated the following:

Statement of Attainment:

- Included reference to the AQF which is not now permissible under the AQF
- Has a copyright statement which is incorrect on this template
- Incorrect colour of NRT logo (red and black)
- Does not include the phrase as noted by NSSC bulletin.

Testamur:

- Included outdated AQF phrase and needs to include correct phrase as per AQF and NSSC bulletin
- Included employability statement which is now not relevant
- Incorrect colour of NRT logo (red and black)
- Accompanying record of results: titled Statement of Attainment, and has a copyright statement which is incorrect on this template.

Student file (Lauren Busacca) indicates that 8 units were credited from previous study. Transcript indicates which 8 units; these are WRB Training Package versions. The packaging rules indicated that two units were not equivalent and credit should not have been granted (*WRRCS1B Communicate in the workplace* and *WRRER1B Work effectively in a retail environment*).

Condition 7

The RTO was non-compliant with this Condition, as recognition information is confusing (i.e. recognition is confused with RCC), process is not clear and the manual generation of statement of results does not accurately reflect the credit granted (e.g. Lauren Busacca). The Student database indicated that entry for units was 'credit'

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but the statement of results, which was generated manually, indicated 'competent'.

Condition 8

The RTO is non-compliant with this Condition as marketing material was incomplete, inaccurate and not up to date; in addition the related policy included inaccurate/illogical information.

Advertising practices policy refers to an Accreditation Council accrediting Qualifications/courses – this is illogical. Advertising Practices Policy does not outline who is responsible for ensuring accuracy of advertising. Issues include:

Student information handbook:

- Included outdated references e.g. Qualification table of the AQF, DEEWR
- Referred to providing the Student Information Handbook on the first day of training, but this is not the case as it is provided prior to enrolment.
- Does not reference key legislation/regulations such as the Education and Training Reform Act or the VRQA Guidelines.
- Does not indicate that for the two Qualifications 60 hours of work placement is required.

Website refers to 'Government accredited beginner training' and that 'We deliver 2 complete government accredited qualification and 3 nationally recognised beginner courses'. This information is not technically correct.

Condition 9

The RTO was non-compliant as there was no process in place for transition of Training Packages.

Recommendations

Condition 1

The RTO is required to ensure that all key positions on the organisational chart have a job description. The RTO is to revise its systems so that the Executive Director ensures that the RTO is compliant with the AQTF.

Condition 3

The RTO is to revise key documentation to staff and students to ensure that information in relation to legislation is accurate and up-to-date.

Condition 4

The RTO is to ensure that there is public liability coverage that is not limited to the wholesale supplies side of the company.

Condition 6

The RTO is to revise sample Statements of Attainment, Qualification testamurs and also the accompanying statement of results to ensure that they meet AQF and AQTF requirements. The RTO is to ensure that statement of results accurately reflects the unit outcome.

Condition 7

The RTO is to ensure that students are not granted credit when the Training Package advises otherwise.

Condition 8

The RTO is required to revise its marketing material on the website and in hard copy to ensure that it is accurate.

Condition 9

The RTO is to ensure that it has established a process for transition of Training Packages.

Strengths

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Opportunities for Improvement
Condition 7: The documents all make an outdated reference to 'mutual recognition', it is suggested that terminology be updated.

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AUDIT REPORT

Standard 1: The RTO provides quality training and assessment across all of its operations		
Audit conclusion	Result	✓
<p>The RTO was non-compliant with Standard 1.</p> <p>Element 1.1. The RTO utilises a range of strategies including student satisfaction surveys, staff feedback and internal audit. However, the RTO was non-compliant with this element as these strategies for the process and implementation for continuous improvement of training and assessment services did not include identifying actions and systematically addressing and monitoring implementation. The RTO has not submitted AQTF student satisfaction data to the VRQA.</p> <p>Rectification The RTO is to revise its documented processes to ensure that the continuous improvement of training and assessment services include identifying issues and monitoring actions taken.</p> <p>Element 1.2 Assessment methods noted in the strategy did not accurately reflect those used for assessment. The Executive Director noted that both programs require 60 hours of work placement; however, this is not made clear in the strategy.</p> <p>Rectification The RTO is to ensure that the training and assessment includes accurate information.</p> <p>Element 1.3. Training is delivered in clusters. Training materials are a series of handouts on various topics which are provided to students. Training handouts did not address all the required knowledge.</p> <p>Certificate III in Beauty Services (SIBXFA201A Design and apply makeup & SIBBCS302A Advise on beauty services) – e.g. There was no information about relevant health and hygiene regulations, relevant occupational health and safety regulations and requirements.</p>	<p>Compliant</p> <p>Non-compliant</p> <p>Not audited</p>	<p>✓</p> <p>✓</p> <p></p>

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Certificate II in Nail Technology

(SIBNLS201A Work in a nail services framework, SIBNLS202A Provide manicure and pedicure services, SIBXCCS202A Provide services to clients, SIBXCLM001A Organise and maintain work areas) – e.g. There was no information about contraindications, workplace communications, and aspects of nail science.

Issues were noted with assessment materials. Refer to 1.5.

Rectification

The RTO is to ensure that handouts address the units of competency.

Element 1.5

Program is delivered and assessed in clusters.

Certificate III in Beauty Services

(SIBXFAS201A Design and apply makeup and SIBBCCS302A Advise on beauty services)

The two units include the skills and knowledge required to design and apply suitable facial make-up to meet client requirements (SIBXFAS201A) as well as the skills and knowledge required to advise clients on a range of beauty services (SIBBCCS302A). SIBBCCS302A describes the research and communication skills required to provide advice on beauty treatments and products that meet the needs of clients. This advice may lead to the operator providing beauty services or the referral of the client to another operator. Competency is to be demonstrated in the workplace or a simulated workplace environment in a range of real work situations which may include client interruptions and involvement in other related activities normally expected in the workplace.

The strategy noted that assessment methods included observation, written assessment and assignments, feedback from 3rd parties, and self-paced activity. The Course timetable indicates that there are 2 assessments – written test and practical assessment.

Assessors noted that for all units completion is also dependent on the feedback from the work placement prior to confirming results. This is not noted in any documentation.

Makeup Assessment Tasks information sheet notes the assessment includes:

- Participation in classroom cleaning roster activities
- Safety procedures practiced in class
- Successful scheduling and maintaining of client appointments

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- Practise model sessions
- Advise on beauty services – homework sheet
- Makeup Case studies – homework sheet
- Client consultation for every client
- Makeup plan for every client
- Written test
- Practical assessment
- Model evaluation form.

Assessment tasks provided included:

Written test: – The test includes 22 short answers and T/F questions. Expected responses are provided. The test is scored out of 50 and it is not made clear how the score is derived. There is no information pertaining to the required performance or conditions for assessment.

Case studies: – There are two separate case studies. Each had 4 questions and sample responses (WRB codes are noted in the sheet). Task sheet result notes competency achieved (Y/N) which is inappropriate at task level. There is no indication of the level of performance required to determine successful completion of task, or information pertaining to the conditions for assessment.

MSDS Task: – There are 6 questions pertaining to materials safety data sheets, and expected answers. There is no information pertaining to the required performance or conditions for assessment, or conditions of assessment.

Recording sheet for Work Area Cleaning Roster. Dated and ticked for each student; however, there is no information as to required performance, indication of tasks performed or how this sheet informs the decision of competence.

Site induction checklist – (list of students attended)

Practise model records – indicates that there are 11 practise events plus the practical assessment. Client record form for detailing client details treatments etc. Makeup plan to be used for each makeup event. Client evaluation form.

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Certificate II in Nail Technology

(SIBBNLS201A Work in a nail services framework, SIBBNLS202A Provide manicure and pedicure services, SIBXCCS202A Provide services to clients, SIRXCLM001A Organise and maintain work areas)

SIBBNLS201A requires the skills and knowledge required to apply the principles of nail science and recognise skin disorders as they apply to nail treatments on hands and feet. SIRXCLM001A requires the skills and knowledge required to maintain and organise work areas in a retail environment. It involves applying personal hygiene practices and the organised use of equipment and chemicals to keep the workplace tidy, clean and safe. SIRXCLM001A requires the skills and knowledge required to deliver a complete customer service experience to clients in a personal services environment. It includes reception duties, scheduling client services, responding to client complaints, and identifying and responding to clients' special customer service needs. SIBBNLS202A requires the skills and knowledge required to perform a range of manicure and pedicure services.

Assessment of competence is to be demonstrated in the workplace or a simulated workplace environment in a range of real work situations which may include client interruptions and involvement in other related activities normally expected in the workplace.

The assessment tasks for the whole of the Qualification are listed; however, there is no indication as to which tasks relate to which units of competency.

The assessment strategy noted the assessment methods as observation, written assessment and assignments, feedback from 3rd parties and work experience. Assessors noted that for all units completion is also dependent on the feedback from the work placement prior to confirming results. This is not noted in any documentation.

Assessment tasks provided included:

Written test: – Includes 4 sections and series of short answer and T/F questions. One hour is allowed for the assessment and the score is marked out of 90. Although expected responses are provided there is no guidance on the level of performance required and score required to determine successful completion of task. No other conditions of assessment are noted.

In salon work experience: Includes a set of instructions as to the purpose of the work experience plus ability to record days of attendance and duties performance, to be signed by manager

Home practice task – a list of practice tasks/clients and recording sheet

Two mani and two pedis task: – This is a report about 2 case studies, plus submission of client feedback. Checklist is provided to highlight what it is covered.

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<p><u>Manicure practical assessment form</u> – A recording sheet with 9 indicators to be demonstrated</p> <p><u>Pedicure practical assessment form</u> – A recording sheet with 13 indicators to be demonstrated</p> <p><u>'Task 3: Case study':</u> After care advice – Includes 3 key questions. There were no expected responses.</p> <p><u>Practise model records</u> – Indicates that there are 15 practise events, Disinfection of files and implements form that the student are to demonstrate each lesson, Work area cleaning roster that the students are to perform each lesson with items to be addressed and option to record name and details. Client consultation care and feedback form.</p> <p><u>Summary of assessment:</u> The assessment information is inconsistent and the assessment tools for each task were poorly designed in that they did not have clear instructions for trainers and assessors; there was limited advice as to the conditions of the assessment; there was no advice as to how to ensure that the assessments simulated work practices (as required by the unit); there was no advice as to determination of successful completion of task; and, no advice as to how to synthesise the evidence for each unit of competency to enable a valid and reliable judgement of competence. Assessment advice did not include how to ensure that the conditions of assessment as required by the units of competency will be met.</p> <p>Validation: There is no procedure or schedule in place for validation (Refer to VRQA Guidelines). Reference to validation is made in the Training and Assessment strategy for each Qualification. Validation of assessment is to occur with assessors annually. There was no evidence of validation with assessors, or what assessment tools were reviewed. The strategy also notes that validation is related to industry consultation. Validation records were sighted for both Qualifications undertaken by an industry contact. The industry contact agreed with all items and there were no comments. The validation process was not sufficiently robust to identify issues and improve assessment practices.</p> <p>RPL: There are no RPL assessment tools developed for either Qualification. The policy and procedure related to RPL and RCC makes outdated references and confuses RCC with credit transfer.</p> <p>Rectification: The RTO is to review and revised all assessment tools to ensure that they enable valid and reliable judgements. The RTO is to review and revise processes for RP and to ensure that there are RPL assessment tools in place for all units. The RTO is also required to implement validation strategies.</p>	<p>Strengths</p>
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Opportunities for Improvement

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Standard 2: The RTO adheres to principles of access and equity and maximises outcomes for its clients			
Audit conclusion			Result
The RTO was not compliant with Standard 2.			✓
Element 2.2 The Continual Improvement Procedure:			
<ul style="list-style-type: none">Identifies the following strategies: internal audit, analysis of data (student satisfaction, complaints and corrective actions) and management of review processes.Does not describe how or when these strategies will be implemented.			Compliant
Strategies implemented included the:			Non-compliant
<ol style="list-style-type: none">AQTF student satisfaction surveys which are undertaken at the end of each program: – These are summarised by Executive Director; however, the data is not collated onto the VRQA form and submitted. An additional survey has been developed to ask additional questions pertinent to the training organisation and the program – including duration of program, number of practice sessions to assist in program review based on the needs of the student. Results are collated, but not analysed, actions recorded, or action reported.Internal audits – The RTO has undertaken an internal audit using the WorkSmart Systems, but there were no actions noted or actions taken.			Not audited
The RTO was non-compliant with this requirement as there was no evidence of analyses, recording of actions and closure of actions to ensure that the continuous improvement cycle of client services.			
Rectification The RTO is to ensure that data related to client services are analysed, actions recorded and monitored for the continuous improvement cycle of client services.			

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Element 2.3

Pre-engagement material consists of:

- Website, accessed 17/12/2013, <http://www.creativesnewedge.com.au/education.php>
- Course flyers
- Beauty courses @CNE brochure
- Student Information Handbook.

Information to students:

- Included outdated references, e.g. qualification table of the AQF, DEEWR
- Did not include key legislation such as the Education and Training Reform Act or the VRQA Guidelines
- Did not reference the requirement to complete a work placement for the certificate programs
- Did not include accurate information pertaining to support services.

Rectification

The RTO is to ensure that all pre-engagement material is accurate and up-to-date.

Element 2.4

All students in the certificate programs are required to undertake work placement as part of the program. Two assessors indicated that work placement evidence is essential for the completion of the Qualifications. There is no list of workplaces, process for reviewing workplaces, no agreement with workplaces, no agreement between student/workplace/RTO. There is no engagement with employers or monitoring of the placements.

Rectification

The RTO is develop a process to quality assure work placements which is determined to be a requirement for completion of the Qualifications.

Element 2.6

There is no procedure documented that explains how results are recorded and resulted. There is no information in relation student access to own

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records.

The Executive Director stated that the RTO has not entered all immediate past students onto the student database (AVETMISS easy) due to issues with the software. The Executive Director stated that the RTO has recently purchased new database software and will update all student details.

Enrolment form revised October 2013 – does not collect all critical information, e.g. form of disability.

Rectification

The RTO is to:

- Revise enrolment form so that it collects all required AVETMISS data
- Revise student information to ensure that students are informed of access to their data
- Ensure that all students' details and outcomes are entered onto the student management system.

Element 2.7

The process for appeals and complaints are unclear and:

- Appeals procedure – there is no indication as to how appellants will be notified of the decision or the reason (at any stage of the process).
- Complaints procedure – there is no information in regards to ensuring that, if the appeal escalates to the independent review, the decision is provided to the complainant.

Rectification

The RTO is to revise the procedures for complaints and appeals to ensure that the process is clear and that at all stages the student will be notified of the decision and the reason for the decision.

Strengths

Opportunities for Improvement

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Standard 3: Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the RTO operates	
Audit conclusion	Result
<p>The RTO was non-compliant with Standard 3.</p> <p>Element 3.1 The agreement with the student is the Enrolment Form. The agreement did not include essential details in relation to the qualification and terms and conditions under which an agreement is made. The Enrolment form did not include the following details: fees and charges of program, refunds policy/procedure and complaints processes.</p> <p>Rectification The RTO is to ensure that the agreement includes essential details in relation to the qualification and terms and conditions under which an agreement is made.</p> <p>Element 3.2 Although the RTO has a documented system in place it does not accurately reflect practice or drive processes. There were various policies and procedures and related documents that included outdated references and were inaccurate. Continuous improvement processes did not ensure that identified issues were noted and actions developed, implemented and monitored.</p> <p>Rectification The RTO is to ensure that its management system enables the AQTF requirements to be met. The RTO is required to revise its processes so that it effectively acts on lessons learnt from continuous improvement data.</p> <p>Element 3.4 Issues sighted at audit included:</p> <ul style="list-style-type: none"> • Not all student details and outcomes data have been entered • The recognition of RTO Qualifications and Statements of Attainment process is not clear and the manual generation of statement of results does not accurately reflect the credit granted (e.g. Lauren Busacca). The Student database indicated that entry for units was 'credit' but the 	<p>✓</p> <p>Compliant</p> <p>Non-compliant ✓</p> <p>Not audited</p>

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statement of results which was generated manually indicated 'competent'.	
<ul style="list-style-type: none"> Records of continuous improvement, such as identified issues, actions to be implemented and monitored, were not maintained. 	
Rectification	
The RTO is to ensure that it maintains records related to its operations and ensures that they are accurate and up-to-date.	
Strengths	
Opportunities for Improvement	

