VET Quality Framework audit report

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

<table>
<thead>
<tr>
<th>Legal name of organisation</th>
<th>Milcom Communications Pty Ltd</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application No</td>
<td>1024049</td>
</tr>
<tr>
<td>Date of site audit</td>
<td>12 November 2012</td>
</tr>
<tr>
<td>Date of interim reports</td>
<td>25 November 2012</td>
</tr>
<tr>
<td>Date of final report</td>
<td>17 February 2013</td>
</tr>
</tbody>
</table>
ORGANISATION DETAILS

RTO legal name        Milcom Communications Pty Ltd   RTO ID number   6859
Registered business trading name Milcom Communications   ABN 59 078 820 774
Address               Unit 10 64 Talavera Rd, NORTH RYDE NSW   Postcode 2113
Phone                  (02) 9889 1177                     Fax (02) 9889 1188
E-mail                 simonp@milcom.com.au    Website http://www.milcom.com.au
Registration contact  Name Simon Peppercorn   Position RTO Manager

AUDIT TEAM

Lead auditor          Sarah Dew  Technical adviser/s
Audit team members

ASQA CONTACT DETAILS

Phone                  1300 701801 (ASQA Info line)   E-mail audits@asqa.gov.au

AUDIT DETAILS

Audit type
- Renewal of registration
- Extension to scope of registration
- Compliance monitoring (incl. post-initial registration)
- Other:

Scope of audit
- Standards for NVR Registered Training Organisations
- Australian Qualifications Framework (AQF)
- Data Provision Requirements
- Fit and Proper Person Requirements
- Financial Viability Risk Assessment Requirements

Date/s of site visit/s  12 November 2012
Site/s visited          North Ryde site
Standards audited      Essential Standards for Continuing Registration 15, 16, 17, 18, 19, 20, 21, 22, 23, 24, 25

ORGANISATION

Milcom specialises in the delivery of a range of communications courses including both accredited and non-accredited training (such as product specific training and course content tailored to the specific corporate needs).

The RTO has had 1571 student enrolments since the beginning of January 2012 and most enrolments are in statement of attainment courses rather than full qualifications. The RTO delivers in Sydney, Queensland, Victoria, and Western Australia and has recently commenced operations in South Australia.

Rectification evidence was submitted by the RTO on 23 January 2013.

FOCUS OF AUDIT

<table>
<thead>
<tr>
<th>Code</th>
<th>Qualification / Accredited course name</th>
<th>Mode(s) of delivery &amp;/or assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td>ICT30310</td>
<td>Certificate III in Telecommunications Cabling</td>
<td>Face to face</td>
</tr>
<tr>
<td>ICTCBL3010A</td>
<td>Install and terminate optical fibre cable on customer premises</td>
<td></td>
</tr>
<tr>
<td>ICTCBL3013A</td>
<td>Perform cable and system test on customer premises</td>
<td></td>
</tr>
</tbody>
</table>
### INTERVIEWEES

<table>
<thead>
<tr>
<th>Name</th>
<th>Position</th>
<th>Program (qualification, course, etc)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Simon Peppercorn</td>
<td>General Manager</td>
<td>All programs</td>
</tr>
</tbody>
</table>

### SUMMARY OF AUDIT OUTCOME

This audit was conducted under the *National Vocational Education and Training Regulator Act 2011* (the Act) to assess compliance with requirements of the VET Quality Framework as identified under the Scope of Audit section above.

### AUDIT OUTCOME

Audit status as at 25 November 2012

- The organisation **has not demonstrated compliance** with all compliance requirements reviewed for the audit.

The level of non-compliance is considered to be significant when considering the potential for adverse impact on the quality of training and assessment outcomes for students.

The audit report describes evidence of non-compliance identified. Each issue referenced must be rectified by the organisation with evidence provided to ASQA within **20 working days** of the date of the letter accompanying this audit report to demonstrate corrective actions implemented.

<table>
<thead>
<tr>
<th>Auditor’s Name</th>
<th>Signature</th>
<th>Date of Report</th>
</tr>
</thead>
<tbody>
<tr>
<td>Sarah Dew</td>
<td>[Signature]</td>
<td>25 November 2012</td>
</tr>
</tbody>
</table>

### AUDIT RECTIFICATION

Audit status following additional evidence received 23 January 2013:

- The organisation **has demonstrated compliance** with all compliance requirements reviewed for the audit.

<table>
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<tr>
<td>Sarah Dew</td>
<td>[Signature]</td>
<td>17 February 2013</td>
</tr>
</tbody>
</table>
# AUDIT SUMMARY OF VET QUALITY FRAMEWORK REQUIREMENTS

<table>
<thead>
<tr>
<th>VET QUALITY FRAMEWORK COMPONENT</th>
<th>STATUS*</th>
</tr>
</thead>
<tbody>
<tr>
<td>Financial Viability Risk Assessment Requirements</td>
<td>☒ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>Fit and Proper Person Requirements</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>Data Provision Requirements</td>
<td>☐ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>Australian Qualifications Framework (AQF) Requirements</td>
<td>☐ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>Standards for NVR Registered Training Organisations 2011 - Essential Standards for Continuing Registration</td>
<td></td>
</tr>
<tr>
<td>15 The NVR registered training organisation provides quality training and assessment across all of its operations</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>16 The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>17 Management systems are responsive to the needs of clients, staff and stakeholders, and the environment in which the NVR registered training organisation operates</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>18 The NVR registered training organisation has governance arrangements in place</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>19 Interactions with the National VET Regulator</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>20 Compliance with legislation</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>21 Insurance</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>22 Financial management</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>23 Certification, issuing and recognition of qualifications and statements of attainment</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>24 Accuracy and integrity of marketing</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
<tr>
<td>25 Transition to training packages/expiry of VET accredited courses</td>
<td>☑ C ☑ NC ☑ NA</td>
</tr>
</tbody>
</table>

*STATUS: Status of audit findings when audit was conducted  
C = Compliant  
NC = Not Compliant  
NA = Not audited

## Audit Findings

### SNR 15.2
The organisation is non-compliant because it did not provide evidence that it had effectively consulted with industry in the development of the ICT30310 Certificate III in Telecommunications Cabling, a course that was selected in the sample of qualifications assessed during the audit.

### SNR 15.3
The organisation is non-compliant because the organisation’s assessment resources require revisions to meet training package requirements, refer to SNR 15.5.

### SNR 15.5
The organisation is non-compliant because the assessment materials sampled did not meet the requirements of the unit of competency.

In relation to unit ICTCBL3010A Install and terminate optical fibre cable on customer premises, the organisation’s assessment materials for this unit did not provide an opportunity for a student to demonstrate competency against all unit requirements, specifically:
- Detailed knowledge of AS/NZS 3080:2003 Telecommunications Installations – Generic Cabling for Commercial Premises – clause 10.3.2
- Detailed knowledge of the ACMA Competency Requirements for Telecommunications Cabling Provider Rules 2000
- The critical aspect of evidence of the unit that requires the student to demonstrate their competency
in completing relevant documentation to the manufacturer’s and design requirements and it was not clear how this is assessed.

In relation to unit ICTCBL3013A Install and terminate optical fibre cable on customer premises, the organisation’s assessment tasks do not provide opportunity for a student to demonstrate competency in:

- Performance Criteria 3.4: Rectify any faults or escalate to the appropriate level
- The unit’s required knowledge: connections to carrier infrastructure or equipment, such as main distribution frame (MDF) or customer interface units (CIU)

In relation to ICTBL2065A Splice and terminate optical fibre cable for carriers and service providers it was not made clear from the assessment tasks how the following unit requirements are assessed:

- Evidence of the ability to splice, terminate and test optical fibre cable applying safety precautions when working with laser based systems
- Splice at least 12 fibres and house these in splicing cassettes and trays within industry recognised enclosures according to manufacturers instructions
- Test for dangerous gases and place guards around open manholes following OHS and environmental requirements

SNR 16.3
The organisation is non-compliant because:

- The Client Information Handbook, version 1.1 revision date 21 June 2012, page 1 refers to outdated information.
- Information on complaints management differs between student information and internal policies and procedures.

SNR 16.6
The organisation is non-compliant because the RTO could not demonstrate that it informs students about how they may access their records of participation and progress.

SNR 16.7
The organisation is non-compliant because the Information that it provides to students in the Student Information Handbook about how they may make a compliant differs from the information that is stated in the Complaint’s Policy and Procedure.

SNR 18.1
The organisation is non-compliant because this report details non-compliances against the Standards and therefore the Chief Executive has not ensured compliance with the VET Quality Framework.

SNR 20.2
The RTO is non-compliant because:

- There is no reference to the SNRs or the VET Quality Framework in staff information, or in any other evidence sighted during the audit process.
- The RTO did not demonstrate that it provides relevant information to students about legislative and regulatory requirements that may affect their participation in VET.

SNR 23.2
The organisation is non-compliant because the organisation is not informing students of the RTO’s obligation to recognize the AQF qualifications and statement of attainments issued by other RTOs.

Rectification requirements – evidence of rectification to be submitted within 20 working days

SNR 15.2
The organisation must provide evidence that it has effectively consulted with industry in the development of the ICT30310 Certificate III in Telecommunications Cabling.

SNR 15.3
The organisation must submit revised assessment resources, further information can be found under SNR 15.5 (below).

**SNR 15.5**
The organisation must submit revised and compliant assessment tasks for unit ICTCBL3010A Install and terminate optical fibre cable on customer premises, ICTCBL3013A Install and terminate optical fibre cable on customer premises and ICTBL2065A Splice and terminate optical fibre cable for carriers and service providers.

**SNR 16.3**
The organisation must ensure student and staff information is up to date and that information on how the RTO manages complaints is consistent across RTO documents.

**SNR 16.6**
The organisation must demonstrate that it informs students about how they may access their records of participation and progress.

**SNR 16.7**
The organisation must ensure complaint information is consistent across RTO documents and resubmit the Student Information Handbook and the Complaint’s Policy and Procedure.

**SNR 18.1**
The organisation must rectify the areas of non-compliances stated in this report.

**SNR 20.2**
- The RTO must amend documents to ensure information is up to date.
- The RTO must also demonstrate that it informs staff about their responsibilities under the VET Quality Framework
- The RTO must demonstrate that it provides relevant information to students about legislative and regulatory requirements that may affect their participation in VET.

**SNR 23.2**
The organisation must demonstrate that it provides information to students of the RTO’s obligation to recognize the AQF qualifications and statement of attainments issued by other RTOs.

**Audit Findings after Rectification Evidence Received on 23 January 2013:**

The RTO submitted rectification evidence on 23 January 2013. This included revised assessment instruments, a revised Student Handbook and a Staff Handbook, copies of relevant Policies and Procedures and evidence of Industry Consultation. An assessment of the evidence has been undertaken and non-compliances have been rectified against SNR 15.2, 15.3, 15.5, 16.3, 16.6, 16.7, 18.1, 20.2 and 23.2.