

AQTF Post Initial Audit**RTO: 7077 National College of Traditional Medicine****Audit Date: June 3 2009****AQTF 2007 AUDIT REPORT**

RTO DETAILS			
RTO Name	National College of Traditional Medicine	NTIS Number	7077
Address	134 Durham rd. Sunshine 3020 VIC		
	Website	www.nctm.com.au	
Registration Contact	Ms Sandra Rogers		
Phone Number	03 9312 5573	E-mail	soraya@nctm.com.au
Student Numbers	12		
AUDIT TEAM			
Lead Auditor	Lesley Shaw	Auditor/s	
Technical Advisor/s		Observer/s	
REGISTERING BODY DETAILS			
Contact Person	Mr. Jerzy Gill		
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AUDIT DETAILS			
Type of Audit	Renewal		
Standards audited	1,2,3		
Conditions audited	5, 6, 8		
Audit Date/s	3 June 2009		
Other audit notes	<p>Small RTO offering training in human and animal complementary health services. Accredited training (only 12 students enrolled currently) is only a small part of the RTO's business with most income being derived from non accredited training in animal health services. The CEO is a lead player within the naturopathy industry and runs her own practice and herbal clinic from the RTO's head office. The Diploma of remedial massage is delivered on site whilst the Advanced Diploma is delivered by distance education with supervised clinical practicum to be completed near the end of the training. As the Advanced Diploma is new on the RTO's scope of registration students have only just begun their studies and are currently completing the required knowledge component of the qualification.</p>		

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FOCUS OF AUDIT		
QUALIFICATION/UNIT OF COMPETENCE/ACCREDITED COURSE		
NTIS Code	Qualification/Unit of Competence/Accredited Course (as per NTIS)	Delivery Site
HLT50307	Diploma of Remedial Massage	Head Office - Sunshine
HLT60107	Advanced Diploma of Western Herbal Medicine	Distance

INTERVIEWEE/S (Staff -name and position; employer name and position ; students (by program, do not list by name)		
Sandi Rogers	NCTM	CEO and lead trainer and assessor
Soraya Bejar	NCTM	College Administrator
Michelle Gatt	NCTM	Marketing/ Administration Officer.
Maria Pilli	NCTM	Student Liaison Officer
	1 Student	Diploma of Remedial Massage
	1 Student	Advanced Diploma of Western Herbal Medicine

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Standard 1: The RTO provides quality training and assessment across all of its operations		
Audit conclusion	Result	✓
<p>Finding:</p> <p>The audit finding is that the RTO is not compliant with Elements 1.4 and 1.5 of this Standard and is compliant with Elements 1.1, 1.2 and 1.3. Suggestions for improvements in relation to Element 1.2, 1.4 and 1.5 are also provided.</p> <p>Element 1.4 Trainer and assessor skills. The RTO was not compliant with this element.</p> <p>Sandra Rogers – Sandra has extensive industry experience including TV and radio appearances, published works, keynote speaker at international and national conferences Runs own naturopathy practice and herbal dispensary from the RTO. Qualifications: BSZ 40198, Apply Basic First Aid (current), Master of Education, Grad. Dip. In Education and Training, Dip. of Medical Herbalism, Incorporated Clinical Masseur, Certificate in Massage, Diploma in Naturopathy, Diploma of Advanced Techniques in the Art of Reflexology, Certificate in Orthotic Therapy, Undertaking a PHD in Education specializing in naturopathy Not all listed qualifications in CV (RTO certified copies) were included in staff file. Copies of qualifications in staff file had not been signed off by the RTO, however some original Certificates were on the office wall. There has been no mapping of training and vocational competencies to the units of competency within the qualifications on the RTO's scope of registration. As Sandra is now delivering and assessing at the Advanced Diploma level and her higher level qualifications to date are in education this mapping should be undertaken for herself and the other trainer and assessor.</p> <p>Royce Borgelt – BSZ 40198 (no Certificate only a transcript of results), Member of the Aust. Assoc of Massage Therapists Dip. Of Remedial Massage, Bachelor of Science (Educ) All signed off by the RTO that the originals had been sighted. Runs own massage clinic. Trained teacher and before coming to NCTM in 2008 he was teaching at Eastern Health Training from 2003 -2007. There has been no mapping of his training and vocational competencies to the units of competency.</p>	Compliant	
	Non-compliant	✓
	Not audited	

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Recommendations:

That the RTO ensure all copies of academic qualifications listed in staff CVs are contained in their individual files and are certified by the RTO that the original has been sighted. Royce Borgett must seek a certified copy of his BSZ40198 qualification to be included in his staff file.

That the RTO establish and verify that trainers and assessors vocational skills meet the requirements of each unit of competency they deliver and/or assess, in line with the RTO's scope of registration.

Element 1.5 Quality of assessment. The RTO was not compliant with this element.

HLT50307 - Diploma of Remedial Massage

A detailed mapping of assessment tasks against the units and elements in all qualifications has been conducted however as an integrated approach to delivery and assessment has been adopted it is difficult to select the assessments that address any one competency.

For each learning segment the RTO is developing assessment packs after these were successfully trialled in the Certificate IV course. A reference is made at the start of the pack that a number of elements of the following units are achieved. In the clinical practicum assessment pack for example the units and relevant elements are listed but it is not made clear how and when the other elements are or have been assessed. This is a weakness across both courses audited.

Sighted completed observation checklists used to verify skills demonstrated in the practical sessions for the previous HLT 02 qualifications. The assessor needs to include comments on observation checklists, otherwise it is just a tick and flick summary sheet and this is insufficient evidence of competency.

HLT60107 Advanced Diploma of Western Herbal Medicine

Delivered by distance over 4 years part time. Written assessments and project work. Must also construct a herbarium and a materia medica. Clinical hours follow after completing assignment work. This will require one to combine theory and practical training in a clinic situation under supervision of a qualified herbalist.

The integrated nature of course means in many cases only some elements are achieved at any one time.

For the entire course the Assessment tasks: 60 assignments, 7 exams and 100 hours of supervised clinical practice.

As the program is distance the RTO will rely on 3rd party reports for the clinical supervision and this will be validated by the CEO conducting one on one interviews with supervisors and potential site visits. The RTO has established minimum requirements that the supervisor must satisfy in order to provide clinical supervision. The observation checklist that has been used to date (see comments above) needs more information on who the supervisor is, their experience and the period of time they have observed the student. There are currently no guidelines to direct and support the workplace supervisor on their role and responsibilities.

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<p>Recommendations: That the RTO review the observation checklist to be used in HLT60107 to include supervisor's name, industry experience and the period they have observed the student. That the RTO develop a guide for the supervisor on their role and reporting requirements to the RTO and develop a system to document all discussions with supervisors of students undertaking a clinical practicum as part of their training.</p>		
<p>Strengths</p>		
<p>Opportunities for Improvement</p>		
<p>Element 1.2 Training and Assessment Strategy That the RTO document within each training and assessment strategy how industry has been involved in the development of each strategy. Element 1.4 Trainer and assessor skills. That the RTO consider utilising the administrative staff, who are qualified assessors, to work with vocationally competent persons to conduct assessments. Element 1.5 Quality of Assessment That the RTO review the delivery sequence of the units in HLT 60107 in order to deliver and assess some complete units of competency in the early stages of the training.</p>		

<p>Standard 2: The RTO adheres to principles of access and equity and maximises outcomes for its clients</p>		
<p>Audit conclusion</p>	<p>Result</p>	<p>✓</p>
<p>Finding: The audit finding is that the RTO is compliant with Elements 2.1, 2.2, 2.3, 2.4 and 2.5 of this Standard; Element 2.3 does not apply (the RTO advised that no traineeships or apprenticeships are being undertaken). A suggestion for improvements in relation to Element 2.2 has been provided</p>	<p>Compliant</p>	<p>✓</p>
	<p>Non-compliant</p>	
	<p>Not audited</p>	

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Strengths		
Opportunities for Improvement		
<p>Element 2.2 Learning, assessment and support services prior to enrolment That the RTO review the student handbook as it states says that RPL and Credit Transfer (CT) can only be applied for at the start of the course. Students should be able to seek RPL and CT at any time during their training.</p>		

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>Finding: The audit finding is that the RTO is compliant with Elements 3.1 and 3.3 of this Standard; Element 3.2 does not apply (the RTO advised that no partnership arrangements were in place). A suggestion for improvements in relation to Element 3.1 has been provided.</p>	Compliant	✓
	Non-compliant	
	Not audited	
Strengths		
Opportunities for Improvement		
<p>Element 3.1 Systematic and continuous improvement to the management of operations That the RTO consider including 'continuous improvement' as a standing item in their Academic Review Committee agendas. A continuous improvement plan could also be developed to record and</p>		

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monitor action items, responsibility and timelines.

That the RTO download the quality indicators resource package from <http://www.acer.edu.au/aqtf/> and integrate the implementation of competency completion, learner engagement and employer satisfaction resources into their continuous improvement plan.

Condition 5 – Financial Management

Audit conclusion	Result	✓
<p>Fees in Advance - The RTO policy says that fees are not taken more than 10 weeks in advance. However the Diploma of Remedial Massage is over 15 months and the course will be fully paid out by 12 months if paid for monthly. Advanced Diploma of Western Herbal Medicine - If payment is by direct debit, monthly fees are collected over 20 months yet the course takes generally 4 years. In less than 2 years the course will be fully paid for. This means that for both courses fees are in fact collected more than 10 weeks in advance of delivery.</p>	Compliant	
<p>Fair and reasonable refund policy – The website indicates that the Advanced Dip. Course costs \$6750 as an upfront payment. The site states there are no refunds once course has commenced and DD scheduled payments must still to be paid. Does this mean that if one has paid fully upfront or are paying by instalments they cannot get any pro rata refund?</p> <p>There is Inconsistency in the policy on refunds on pages 18 and 20 of policy document. Page 18 – prior to commencement one may be required to give a max. of 10 weeks notice to obtain a refund but on page 20 fees are not taken more than 10 weeks in advance. What is meant by this?</p> <p>After commencement a student may be required to give 2 weeks notice of withdrawal to obtain a refund. On the web it states that no refund once course has commenced. Revisit for consistency and fairness.</p> <p>Recommendation: That the RTO review their policy and procedure for collecting fees in advance and refunds as there are inconsistencies and a lack of clarity in the information provided on the website, the student handbook and in the RTO's written policies.</p>	Non-compliant	✓
	Not audited	

Strengths

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Audit conclusion	Result	✓
Academic Transcript – At audit RTO removed a reference to nominal hours and a reference to grades as the RTO only awards competent or not yet competent Certificate sample included the ES statement from the start of 2009. Could improve by adding VRQA logo though not compulsory. Statement of Attainment – a sample was developed at audit as none issued to date.	Compliant	✓
	Non-compliant	
	Not audited	

Strengths**Opportunities for Improvement****Condition 8 – Accuracy and Integrity of Marketing**

Audit conclusion	Result	✓
Website – There are a number of inconsistencies in the manner in which the nationally recognised courses are referred to. Often short titles are used eg: Massage Certificate IV,	Compliant	

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<p>Remedial Massage Diploma. Full titles and codes must always be used. This becomes of more concern as the College offers a number of their own Certificates and Diplomas. The RTO should fully explain that the Reflexognosy Diploma is an RTO developed Diploma and why it is delivered and assessed as part of the nationally recognised Diploma of Remedial Massage.</p> <p>The home page uses what appears to be a newspaper clipping that refers to the nationally recognised courses on its scope. The logo is included and the correct codes and titles of courses listed however on the same page are advertisements for non accredited courses. The potential student could reasonable assume all courses on the page are nationally recognised.</p> <p>Page for Human Studies – Short course titling for some qualifications has been used and a national code missing on another. At the bottom of the page the NRT logo has been used for one qualification however one could assume all the courses on the page are nationally recognised. The use of the ‘Diploma of Clinical Hypnotherapy’ at the top of the same page may lead the reader to infer it is an accredited national qualification.</p> <p>The information also refers to ‘government awarded units’. Correct terminology would be ‘national units of competency’.</p> <p>Recommendations:</p> <p>That the RTO on all student information including learning programs and marketing material state that the RTO developed Reflexognosy Diploma is not a requirement to achieve HLT50307 Diploma of Remedial Massage. The RTO should explain to potential students why they deliver and assess the Reflexognosy Diploma as part of the Diploma of Remedial Massage.</p> <p>That the RTO ensure that full qualification titles (including their code) and units are referred to as national units of competency on all marketing materials including the website.</p>	Non-compliant	✓
	Not audited	
Strengths		
Opportunities for Improvement		
That the RTO consider separating accredited and non accredited courses in all advertising material including the website.		