

VET Quality Framework audit report

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

Legal name of organisation	Mission Australia
Date/s of audit	28 – 29 August 2012; 12 September 2012
Date of final audit report	14 November 2012
Application number	1024005

ORGANISATION DETAIL	.S							
RTO legal name	Mission Australia				RT	RTO ID number 6966		
Registered business trading name	Mission Australia Training Institute Mission Australia			AE	BN	15 000 002	522	
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Registration contact	Name	Mr Gary Godfree		Positio	n	National RTO	Manager	
AUDIT TEAM								
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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	28 – 29	August 2011; and 12 September 2	012					
Site/s visited		Level 2 40 Raymond St Bankstown (28 – 29 August 2011) Toowoomba QLD (12 September 2012)						
Standards audited	Essentia	ol Standards for Continuing Registr	ation	15, 16,	17,	18, 19, 20, 21, 2	22, 23, 24, 25)

ORGANISATION

Mission Australia has been conducting accredited training since the mid 1990's and was first registered as an RTO on 29-11-1995. Their current registration expires on 24-06-2012 (which has been extended while the renewal audit is open). The last audit was for addition to scope for aged care and children's services qualifications in 2010.

Vocational education and training has long been a key component of Mission Australia's work with unskilled or semi-skilled people, beginning in Green Valley, Western Sydney in the late 1970s. By 1994/95 Mission Australia was one of the key vocational education and training providers in Sydney and was among the first not-for-profit organisations to become an RTO.

Mission Australia is a provider of family and community services throughout Australia. The organisation has at least 2900 FTE staff, 1,000 volunteers and 300 services in every state and territory of Australia, and is one of the largest community organisations in the nation. It is currently headed by Toby Hall.

Mission Australia was a beneficiary of the Australian Government's privatisation of employment services in 1998. It is a major provider of employment services in the Job Network with over 80 sites throughout Australia.

Mission Australia provides accommodation and support programs for the homeless; creative services for homeless youth; counselling and support programs for families and accommodation and support for people with disabilities.

Mission Australia is now divided into two major divisions, Community Services and Employment Solutions with the RTO now part of Community Services but providing support across the entire organisation. Prior to 2009, Mission Australia consisted of three major divisions, Employment, Community and Training.

Mission Australia Employment Solutions is one of Australia's largest providers of employment programs, including:

- <u>Job Services Australia</u> provides job seekers with training and support to help them become job-ready, and offers employers a free recruitment service tailored to the needs of their business.
- <u>Australian Apprenticeships</u> helps employers to complete a training contract, advises apprentices and businesses on their rights, responsibilities and available government incentives.
- The ACCESS Program provides job seekers experiencing barriers to skilled employment with pre-vocational training, support and assistance to obtain and maintain an Australian Apprenticeship and move into employment or further training.
- New Enterprise Incentive Scheme (NEIS) provides job seekers with information, advice and practical support to help them to start their own business.
- <u>Disability Management Services</u> offers tailored services to help job seekers with a disability to find and keep a job, and also supports businesses to hire a person with a disability.

In February 2009 as a means of providing improved training services with an independent management structure, it was decided to outsource the training and assessment services for the majority of government funded programs. The training and assessment services were managed by Sugar International. This involved a complete re-structure of the RTO and the closing down of all State Training Offices. A high number of permanent and part time RTO employees were made redundant. Mission Australia retained its RTO status and managed the partnership for all outsourced programs with the external subcontractor. The sub-contractor had access to Mission Australia's LMS (VETtrack) and did all data entry and funding claims. The sub-contractor was unable to fulfil its commitment to provide training and assessment services for one program and another sub-contractor had to be engaged. Due to the confines of this contract, the RTO (Mission Australia) was largely restricted to the management of just a few programs including the national Language, Literacy and Numeracy Program (LLNP), the New Enterprise Incentive System (NEIS), U-Turn in Tasmania and accredited training at Triple Care Farm at Robertson in NSW.

In February 2012 Mission Australia and the sub-contractor (Sugar International), mutually agreed upon an early termination of the contract thus now allowing Mission Australia's RTO to operate without the contractual restrictions of the past 3 years. The RTO advised that despite continual Mission Australia audits, the services provided by Sugar International were not delivered and assessed in a manner which met Mission Australia's requirements. The RTO now operates with minimal staff and relies on the support provided by the individual programs such as LLNP and NEIS to maintain compliance and meet RTO operational objectives.

The RTO's focus is to return to core business of Mission Australia to provide accredited training for staff and clients (mostly disadvantaged groups). The RTO scope has been reduced to reflect that focus in order to begin accredited training in the second half of 2012. Qualifications may be added as needed in future.

The RTO has engaged in planning its business as part of the planning process for the Community Services Division. A 3 year Strategic Overview 2012-13 to 2014-15 (which also contains a KPI dashboard) was sighted. Business Plan 2011-12 Year end progress report sighted. Report on Workforce Development Strategy 21/1/2012 prepared by RTO.

The RTO has three staff: National RTO Manager, Manager Training Systems and Training Administrator. The National RTO Manager reports to the National Operations Manager (Roger Kennedy – RTO CEO) who in turn reports to the Executive Leader, Community Services and Mission Australia CEO. Training and administrative staff are located within business units.

The RTO's main areas of delivery are:

- Language Literacy and Numeracy Program funded by DEEWR / DIISRTE where learners are referred by Centrelink, Job Services Australia (JSA) providers and Disability Employment Service (DES) providers
- New Enterprise Incentive Scheme (NIES) funded by DEEWR
- U-Turn program in Tasmania a youth diversionary program using AUR10105 Certificate I in Automotive
- Triple Care Farm program for people with substance abuse issues (forklift training)

The RTO also delivers MEM30305 Certificate III in Engineering - Fabrication Trade in partnership with Workforce Improvement Initiatives. (This is a legacy program in Queensland and is aimed at existing workers)

A large number of qualifications for which there were no resources for delivery were removed from the RTO's scope in the weeks prior to the renewal audit.

The RTO's scope for renewal is now	The	RTO's	scope	for	renewal	is	now
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1.	AHC20410	Certificate II in Horticulture
2.	AUR10105	Certificate I in Automotive
3.	BSB10107	Certificate I in Business
4.	BSB20107	Certificate II in Business
5.	BSB30107	Certificate III in Business (deleted from scope 12/9/2012)
6.	BSB30407	Certificate III in Business Administration
7.	BSB40507	Certificate IV in Business Administration
8.	BSB40407	Certificate IV in Small Business Management
9.	BSB40807	Certificate IV in Frontline Management
10.	BSB51107	Diploma of Management
11.	CHC10108	Certificate I in Work Preparation (Community services)
12.	CHC30208	Certificate III in Aged Care
13.	CHC30308	Certificate III in Home and Community Care
14.	CHC30708	Certificate III in Children's Services
15.	LGA20104	Certificate II in Local Government (deleted from scope 12/9/2012)
16.	MEM30305	Certificate III in Engineering - Fabrication Trade
17.	SIR20207	Certificate II in Retail
18.	SIT20207	Certificate II in Hospitality
19.	TLILIC2001A	Licence to operate a forklift truck
20.	21770VIC	Course in Initial General Education for Adults
21.	21771VIC	Certificate I in General Education for Adults (Introductory)
22.	21772VIC	Certificate I in General Education for Adults
23.	21773VIC	Certificate II in General Education for Adults
24.	21774VIC	Certificate III in General Education for Adults
25.	91418NSW	Course in Preliminary Spoken and Written English
26.	91419NSW	Certificate IV in Spoken and Written English - Further Studies
27.	91420NSW	Certificate IV in Spoken and Written English - Employment
28.	91421NSW	Certificate I in Spoken and Written English
29.	91422NSW	Certificate II in Spoken and Written English
30.	91423NSW	Certificate III in Spoken and Written English

FOCUS OF AU	DIT	
Code	Qualification / Accredited course name	Mode(s) of delivery &/or assessment
AHC20410	Certificate II in Horticulture	Classroom face to face
CHC30208	Certificate III in Aged Care	Classroom face to face / employment based
CHC30708	Certificate III in Children's Services	Classroom face to face / employment based
21771VIC	Certificate I in General Education for Adults (Introductory	Classroom face to face
21774VIC	Certificate III in General Education for Adults	Classroom face to face
91419 NSW	Certificate IV in Spoken and Written English	Classroom face to face
BSB40807	Certificate IV in Frontline Management	Classroom face to face
BSB51107	Diploma of Management	Classroom face to face
LGA20104	Certificate II in Local Government	Classroom face to face
BSB40707	Certificate IV in Small Business Management	Distance delivery for Qld, Victoria, Tasmania and NT. SA, NSW, WA predominantly delivered face-to-face.

INTERVIEWEES						
Staff (name and position)						
Name	Position	Program (qualification, course, etc)				
Gary Godfree	National RTO Manager					
Nevine Ghaly	Service Manager	Spoken and Written English and General Education courses				
Jillian Fritz	Business Manager, JSA Toowoomba, NEIS Manager Qld and NT.	BSB40407 Certificate IV in Small Business Management for the NEIS program.				
David Rozynski	NEIS Job seeker solutions Manager/ Trainer/Assessor.	BSB40407 Certificate IV in Small Business Management for the NEIS program.				

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 4 October, 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.

Auditor's Name	Stephen Auburn	Signature	Silvery	Date of Report	27 September 2012
		AUDIT	RECTIFICATION		

Audit status following additional evidence received 2 November 2012

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

Auditor's Name Stephen Auburn Signature	Date of Report	14 November 2012
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AUDIT SUMMARY OF VET QUALITY FRAMEWORK REQUIREMENTS

	VET QUALITY FRAMEWORK COMPONENT	STATUS*				
Financia	Financial Viability Risk Assessment Requirements					
	Fit and Proper Person Requirements					
Data Pro	Data Provision Requirements					
	Australian Qualifications Framework (AQF) Requirements					
Standar	ds for NVR Registered Training Organisations 2011 - Essential Standards for Continuing Registration					
15	The NVR registered training organisation provides quality training and assessment across all of its operations	⊠ c □ NC □ NA				
16	The NVR registered training organisation adheres to principles of access and equity and maximises outcome for its clients	⊠ c □ nc □ na				
17	⊠ c □ nc □ na					
18	the environment in which the NVR registered training organisation operates The NVR registered training organisation has governance arrangements in place	⊠ c ☐ NC ☐ NA				
19	Interactions with the National VET Regulator	⊠ c ☐ nc ☐ na				
20	Compliance with legislation	⊠ c ☐ NC ☐ NA				
21	Insurance	⊠ c ☐ nc ☐ na				
22	Financial management	⊠ c ☐ nc ☐ na				
23	Certification, issuing and recognition of qualifications and statements of attainment	⊠ c ☐ nc ☐ na				
24	Accuracy and integrity of marketing	⊠ c ☐ NC ☐ NA				
25	Transition to training packages/expiry of VET accredited courses	⊠ c ☐ NC ☐ NA				
*STATUS:	Status of audit findings when audit was conducted C = Compliant NC = Not Compliant	NA = Not audited				
Lacera positiona						

Audit Findings				
	nonstrated compliance	with the VET Qu		

Fit and Proper Person Requirements

FPPR declaration has not been completed by Gary Godfree National RTO Manager

SNR 15.2

The RTO has not provided evidence those strategies for training and assessment used by the meet the requirements of the relevant training package, have been developed through effective consultation with industry and provide sufficient guidance to trainers/assessors to deliver quality training and assessment. Specifically,

BSB51107 Diploma of Management

- The packaging rules of this qualification are 8 elective units as per <u>www.training.gov.au</u>, the national training register. TAS provided by applicant has 5 Core units and 3 Elective units of competency.
- RTO has not provided details of modes of delivery, assessment method matrix and details of resources available to deliver this qualification.
- RTO has not provided evidence of industry consultation and how it informed LAS, of contextualization of assessments and learning resources for this qualification, or of workplace arrangements.

BSB40807 Certificate IV in Front Line Management

- Applicant has not provided evidence of industry consultation and how it informed LAS.
- No evidence of contextualization of assessments and learning resources for this qualification.

CHC30208 Certificate III in Aged Care

- LAS is generic and does not address the specific needs of the stated (different) target groups
- Entry requirements: are not consistent with Training Package.
- Industry Consultation: No details of consultation provided and how it informed LAS. Basis of choice of electives is not clear.
- Structure and Duration: not stated. No nominal hours by qualification or by UoC.
- Modes of delivery: Not addressed. No sequence of delivery. No indicative hours apart from 120 hours' work
 placement
- No assessment plan. Assessment Strategy: Assessment methods matrix provided. Not consistent with CHC08 requirements: e.g. no assessor workplace observation indicated for CHCAC319A Provide support to people living with dementia or CHCCS305A medication
- Assessment approaches and workplace assessment are inconsistent with the stated target groups. Written
 assignment are inconsistent with AQF level and requirements of the job roles (e.g. essays)
- · Validation statement is generic
- Resources: No list of resources required by UoC. Training resources identified.
- Trainers/assessors by UoC not indicated

CHC30708 Certificate III in Children's Services

- · LAS is generic
- Industry Consultation: ABC ELC No details of consultation provided and how it informed LAS
- Structure and Duration: not stated. No nominal hours by qualification or by UoC.
- Modes of delivery: face to face. No sequence of delivery. No indicative hours apart from 120 hours' work
 placement
- No assessment plan.
- Assessment approaches and workplace assessment are inconsistent with the stated target groups. Written
 assignment are inconsistent with AQF level and requirements of the job roles (e.g. essays)
- Validation statement is generic
- Moderation on demand or annually
- Resources: No list of resources required by UoC. Training resources identified.
- Trainers/assessors by UoC not indicated

MEM30305 Certificate III in Engineering - Fabrication Trade (Surface finishing)

- LAS is generic (i.e. not for a specific employer)
- Not clear whether arrangements are apprenticeships or traineeships
- Structure and Duration: not stated. No nominal hours by qualification or by UoC.
- Modes of delivery: Not addressed. No sequence of delivery. No indicative hours apart form 120 hours' work placement
- No matrix of assessment methods by UoC. No assessment plan.
- Validation generic statement no records sighted
- Describes role of workplace mentor
- Resources: No list of resources required by UoC. Training resources identified.

LGA20104 Certificate II in Local Government

- LAS is generic:
- 1 Core and 9 elective units- choice of 3 out of 5 basis of choice is not clear. No details of consultation provided and how it informed LAS
- No assessment plan.
- Assessment approaches and workplace assessment are inconsistent with the stated target groups. Written
 assignment are inconsistent with AQF level and requirements of the job roles (e.g. essays, presentations, training
 programs)
- Validation statement is generic
- Resources: No list of resources required by UoC. Training resources identified.
- Trainers/assessors by UoC not indicated

AHC20410 Certificate II in Horticulture

- LAS is generic
- No details of consultation provided and how it informed LAS
- Structure, duration and modes of delivery: not stated. Not addressed. No sequence of delivery. No indicative hours
- No assessment plan. Assessment Strategy: Assessment methods matrix provided. No indication of where

observations would occur or of any work placement arrangements

- Written assignment are inconsistent with AQF level and requirements of the job roles (e.g. essays)
- Validation statement is generic
- Resources: No list of resources required by UoC. Training resources identified.
- Trainers/assessors by UoC not indicated

BSB40407 Certificate II in Small Business Management

Whilst the RTO has validated the assessments, it is still referencing Version 1 of the qualification. The units of competency provided at audit are version 1. A new version (version 2) of the Training Package was released on 28 November 2011. Whilst the units are still identified on the Training Package as Version 1, the units provided at audit were printed by the RTO on 21 July 2011; therefore, the current Training Package version has not been referenced.

SNR 15.3

- Non-compliances have been identified at SNR 15.2 and 15.5 in relation to learning and assessment strategies and assessment materials
- Equipment and other resources related to scope and UoC have not been identified and included in learning and assessment strategies

SNR 15.4

The RTO has not provided evidence that training and assessment is delivered by trainers and assessors who have the relevant vocational competencies at least to the level being delivered or assessed; can demonstrate current industry skills directly relevant to the training/assessment being undertaken; and continue to develop their vocational education and training (VET) knowledge and skills as well as their industry currency and trainer/assessor competence; specifically:

- <u>Cellia Prosser</u> does not have the relevant vocational competencies at least to the level being delivered or assessed and no evidence of professional development activities undertaken
- <u>Gaynor Lawton</u> has not provided evidence of industry currency and evidence not provided of relevant vocational
 competencies at least to the level being delivered or assessed. No evidence of professional development sighted
 at audit.
- <u>Ben Solomon</u> no evidence how industry skills/experience relate to each unit to be delivered; or of professional development as a trainer/assessor
- <u>Stephen Kelcoyne-Lawrence</u> no evidence of verified training and vocational qualifications; evidence of industry currency and evidence not provided of relevant vocational competencies; no evidence how industry skills/experience relate to each unit to be delivered; or of professional development as a trainer/assessor
- AHC20410 Certificate II in Horticulture: No trainers/assessors nominated
- <u>Vicky Burge</u> has not provided evidence of industry currency (in aged care and management) and evidence not
 provided of relevant vocational competencies at least to the level being delivered or assessed. No evidence of
 professional development in training and assessment.
- Gail Kirkpatrick No professional development in training and assessment indicated
- <u>Lyn Spokes, Hazel Crowe, Annie Kite, Josie Bazzacco, Lissa Clayton No evidence provided as to how they comply with the standard</u>

SNR 15.5

The RTO has not provided evidence that assessment meets the requirements of the relevant training package; is conducted in accordance with the principles of assessment and the rules of evidence; meets workplace requirements and is systematically validated and moderated. Specifically:

BSB51107 Diploma of Management

- Applicant has not provided RPL Kit for this qualification
- Assessment tools for BSBWRK509A Manage industrial relations and BSBLED501A Develop a workplace learning
 environment does not meet the requirements of unit of competency. There are no workplace arrangements for
 the assessments to be conducted. It is not clear on how many occasions the supervisor needs to observe the
 candidate in the workplace, what evidence is required, what tasks are required to do and how the candidate can
 provide evidence or demonstrate capability in workplace.

BSB40807 Certificate IV in Front Line Management

Assessment tool for BSBMGT402A Implement operational plan:

- The assessment tool submitted focus on the submission of three parts of assignment consisting of very short answer, short answer and detailed answer. While a range of method of assessment suggested in the UOC, there were no assessment methods to assess practical skills and knowledge of students.
- No evidence of contextualization to target group of learners.
- It is not clear on how many occasions the supervisor needs to observe the candidate in the workplace, what

evidence is required, what tasks are required to do and how the candidate can provide evidence or demonstrate capability in workplace.

The assessment tool does not meet the requirements of the unit of competency.

Assessment tool for BSBWOR401A Establish effective workplace relationships

- The assessment tool submitted focuses on submission of tasks for Assessment 1 which is answer 14 short answers and Assessment 2 which is a workplace project.
- While a range of method of assessment suggested in the UOC, there were no assessment methods to assess
 practical skills and knowledge of students.
- No evidence of contextualization to target group of learners.
- It is not clear on how many occasions the supervisor needs to observe the candidate in the workplace, what evidence is required, what tasks are required to do and how the candidate can provide evidence or demonstrate capability in workplace.
- The assessment tool does not meet the requirements of the unit of competency.

RPL Kit: RPL Kit was not provided.

CHC30208 Certificate III in Aged Care

- Assessment tools are insufficient to determine competency
- No records of validation available

CHCAC319A dementia

 No marking guides; No indication as to how evidence guide and critical aspects of assessment and evidence are met

CHC30208 - personal care

• No observation tool as required by UoC and by LAS; No marking guides; No indication as to how evidence guide and critical aspects of assessment and evidence are met

RPL Kit: RPL Kit was not provided.

MEM30305 Certificate III in Engineering – Fabrication Trade

No records of validation available

MEM11010B Operate mobile load shifting equipment

- Practical observation by assessor checklist no provision for assessor signature or date
- No provision for supervisor feedback
- No marking guides
- . No indication as to how evidence guide and critical aspects of assessment and evidence are met

MEM0808013B prepare surfaces by abrasive blasting (advanced)

- Practical observation by assessor checklist no provision for assessor signature or date
- No marking guides
- No indication as to how evidence guide and critical aspects of assessment and evidence are met

LGA20104 Certificate II in Local Government

LGACOMP008A Apply conflict resolution skills

• The tools do not meet the requirement of Evidence Guide

LGACOMP008A Implement effective communication techniques

The tools do not meet the requirement of Evidence Guide

AHC20410 Certificate II in Horticulture

AHCARB203A Perform above ground pruning

- Written assessment not at AQF level
- The tools do not meet the requirements of Evidence Guide
- No marking guides

AHCPMG201A Treat weeds

- Written assessment not at AQF level
- The tools do not meet the requirements of Evidence Guide
- No marking guides

CHC30708 Certificate III in Children's Services

CHCIC301E Interacts with children

- No indication as to how evidence guide and critical aspects of assessment and evidence are met
- No marking guides

CHCCN302A Provide care for children

- Portfolio relationship of and relevance of task to UoC is not clear. Instructions to student unclear.
- Observation tool does not identify tasks observed or context of assessment

- . No indication as to how evidence guide and critical aspects of assessment and evidence are met
- No marking guides

BSB40407 Certificate IV in Small Business Management

BSBSMB401A Establish legal and risk management requirements of small business

BSBSMB301A Investigate micro business opportunities

- The RTO provided a 'Mapping of Assessment' document covering the above qualification which does not align to the assessment instruments. Whilst there is no requirement under the Standards for NVR Registered Training Organisations 2011 for an RTO to develop a mapping document, if the RTO has developed such a document, it would need to be accurate.
- BSBSM8401A Establish legal and risk management requirements of small business: The above unit of
 competency assessment does not cover all aspects of the 'Required knowledge', specifically with regard to
 creation and termination of relevant legal contracts and relevant industry codes of practice.

SNR 16.4

- In relation to BSB40807 Certificate IV in Frontline Management, BSB51107 Diploma of Management, CHC30208
 Certificate III in Aged Care, CHC30708 Certificate III in Children's Services, LGA20104 Certificate II in Local
 Government and MEM30305 Certificate III in Engineering Fabrication Trade, the RTO was not able to provide
 evidence of how:
 - workplace personnel are informed of their training and assessment roles and responsibilities, where relevant to the training and assessment program
 - the RTO monitors the contribution of workplace personnel in supporting each learner's training and assessment
 - the RTO monitors the learner's progress
 - Information from workplace personnel is used to continuously improve training and assessment.

SNR 18.1

• Non-compliances with the VET Quality Framework are identified in this audit report.

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

Fit and Proper Person Requirements

• Completed FPPR declaration for Gary Godfree National RTO Manager

SNR 15.2

- Revised LAS for each sampled qualification that reflect a specific target group and address the non-compliances identified.
- BSB40407 Certificate IV in Small Business Management: The RTO is to provide its amended strategy for training and assessment which accurately reflects the current Training Package version plus a copy of the relevant state branches' strategies to evidence the specific type of mode/s of delivery provided.

SNR 15.3

- Rectification evidence for 15.2 and 15.5.
- Identification of equipment and other resources required for delivery for each qualification sampled at audit. The RTO may choose to provide this information in the rectification for SNR 15.2.

SNR 15.4

• Evidence to address the non-compliances for each trainer/assessor identified

SNR 15.5 .

- Revised assessment tools for the sampled UoCs that are consistent with the learning and assessment strategies and the evidence requirements of the Training Packages and evidence that they have been validated
- Amended 'Mapping of Assessment' document for all sampled qualifications which accurately reflects the assessment instruments.
- A plan to ensure that all assessments for all qualifications on scope are progressively validated.

SNR 16.4

• Evidence to address the non-compliances identified

SNR 18.1

• Evidence to address the non-compliances identified in this report

Review of evidence received 2 November 2012

Fit and Proper Person Regulrements

• The additional evidence has demonstrated compliance

SNR 15.2

• The additional evidence has demonstrated compliance

SNR 15.3

• The additional evidence has demonstrated compliance

SNR 15.4

• The additional evidence has demonstrated compliance

SNR 15.5

• The additional evidence has demonstrated compliance

SNR 16.4

• The additional evidence has demonstrated compliance

SNR 18.1

The additional evidence has demonstrated compliance