

○ **Ministry of Training,
Colleges and Universities**
Private Career Colleges Branch
9th Floor, Mowat Block
900 Bay Street
Toronto ON M7A 1L2

**Ministère de la Formation
et des Collèges et Universités**
Direction des collèges
privés d'enseignement professionnel
9^e étage, édifice Mowat
900, rue Bay
Toronto ON M7A 1L2



Notice of Contravention # 157

NOTICE OF CONTRAVENTION

**Served by email(srikkanth.danthala@scitech.com), by fax(416-661-5201)
and by Courier**

July 13, 2011

Srikkanth Danthala, Director
Sribha Consultants Ltd., operating as
SCL Academy
#602, 1280 Finch Avenue West,
Toronto, Ontario M3J 3K6S

and

6806 Simpson Pioneer Trail
Mississauga, Ontario L5W 1A6

Dear Srikkanth Danthala, Director:

[1] This letter is to inform you as the Director of Sribha Consultants Ltd., operating as SCL Academy (the "School") that on July 13, 2011, it was determined that the Business contravened the following section(s) of the *Private Career Colleges Act, 2005* and/or of regulations made under the Act:

- A. Act, s. 11 — Restrictions on advertising and soliciting
- B. Act, s. 8 (1) – Prohibition against providing vocational programs
- C. Act, s. 7 – Prohibition against operating a private career college

For a detailed explanation of each contravention see attached Schedule A.

[2] As per section 51 of *Ontario Regulation 415/06* made under the *Private Career Colleges Act, 2005*, the Business is subject to a penalty in the total amount of \$3,000 per day. It is important to note that the penalty is levied daily. The total penalty amount is calculated by multiplying the penalty amount indicated above by the number of successive days that the contravention continues.

For example: following 5 successive days that the contravention continues the penalty amount due will be \$15,000.

following 15 successive days that the contravention continues the penalty amount due will be \$45,000.

[3] At this time you are required to provide the Ministry with written confirmation of compliance with the *Private Career Colleges Act, 2005* and its regulations. Please supply the Ministry with the following documents confirming that you have come into compliance with the Act:

1. Written confirmation that the School has stopped advertising an unregistered private career college and unapproved vocational programs that require approval;
2. Written confirmation that the School has stopped providing vocational programs that require approval; and
3. Written confirmation that the school has stopped operating as a private career college.

Once you have confirmed compliance with the Act, the penalties will cease to accumulate and you will receive an invoice that sets out the total penalty outstanding. Payment of the full amount is due within **30 days** of the date of your notification.

[4] If payment is not received within **30 days** after the date the notice of contravention was received, the amount will be subject to interest at the current postjudgment interest rate beginning on the 31st day following the date of notice. The current rate can be found at the following address:

www.attorneygeneral.jus.gov.on.ca/english/courts/interestrates.asp.

Review

[5] If you believe that the decision made above is inaccurate you may request a review of this decision by submitting a Request for a Review of a Notice of Contravention form to the Minister of Training, Colleges and Universities within **15 days** of receipt of the Notice of Contravention.

Issued by:

ORIGINAL SIGNED BY

Allan Scott
Superintendent of Private Career Colleges

Schedule A

[6] The Superintendent has issued this Notice of Contravention based on the following findings, supporting facts and evidence:

A. Advertising an unregistered Private Career College, contrary to section 11(1) of the Act and advertising unapproved vocational programs, contrary to section 11(2) of the Act

[7] On February 18, 2011, a Designate of the Superintendent (“Designate”) reviewed the website; <http://www.sribha.com>. The homepage provides a link to the SCL Academy.

[8] A review of the website for this School (www.sribha.com) by the Designate revealed the following evidence demonstrating this School is advertising itself as a private career college (PCC):

- i) The “SCL Academy” online brochure states “SCL Technology Solutions has identified this need and established SCL Academy, formerly known as Sribha Consultants Ltd, to support, enhance and accelerate careers of job-seekers in the field of Information Technology”;
- ii) The “SCL Academy” online brochure also provides that the headquarters are in Toronto;
- iii) The “SCL Academy” online brochure also provides the address for SCL Academy as the 1280 Finch Avenue West, Suite 602 Toronto ON M3J 3K6.

[9] Based on that evidence, the Designate was led to the reasonable belief that this School is advertising itself as a PCC without being registered.

[10] On February 18, 2011, a Designate of the Superintendent (“Designate”) reviewed the School’s website; <http://www.sribha.com>, and concluded that the School advertised several programs which could be deemed vocational; however, the School did not specify program cost or duration on the website.

[11] The questionable programs were the following:

- 1) Quality Assurance and Software Testing
- 2) Software Business Analysis
- 3) Project Management
- 4) Data Warehousing

The screenshot displays the SCL Academy website interface. At the top left is the SCL logo with the tagline "STAFFING . CONSULTING . TECHNOLOGY ...OPTIMIZED". A navigation menu includes "Home", "Services", "Media Kit", "Portfolio", and "Contact SCL".

SEARCH JOBS

Search fields:
 Keywords Title
 Location Job Type
[Advanced JobSearch](#)

SIGN IN:

User Name :
 Password :
 Employer
 Job Seeker
 SCL Consultant
 SCL Staff
 Remember Me

[Forget Password?](#) | [Sign Up](#)

SCL ACADEMY-NEW COURSES

New Batch - Quality Assurance & Testing

SUBSCRIPTION

Newsletter Press Release
 Email:

SERVICES

SCL ACADEMY®

[View Scl Academy Documents](#)

"Learning is not a destination, but a Journey"; and this is what SCL Tech strongly believes in. With this credence, SCL Tech has started an academic wing to support and sustain various corporate clients, consultants and others who possess an inclination towards learning to add a new dimension to their career and professional development.

SCL Academy is commencing the following training programs in the mid-week of January.

- Quality Assurance & Software Testing - Principles, Methodologies, Concepts & Tools.
- Software Business Analysis - Principles, Methodologies, Concepts & Tools.
- Project Management - An introduction and preparation for PMP and PgMP programs.
- Data Warehousing - An Introduction to Data Warehouses and Data Mining techniques, the indispensable parts of business intelligence program.
- SAP HR/HCM(Human Capital Management) Module - A detailed course on one of the hottest areas in SAP consulting.

To know more about SCL Academy, various courses offered and other details, please contact us sclacademy@scitech.com

[12] A field visit to 1280 Finch Avenue West, Suite 602, Toronto was conducted by two Designates on May 26, 2011. Two employees of Sribha consultants met with Designates to determine what programs were being offered and whether these programs were vocational therefore needing approval by the Superintendent

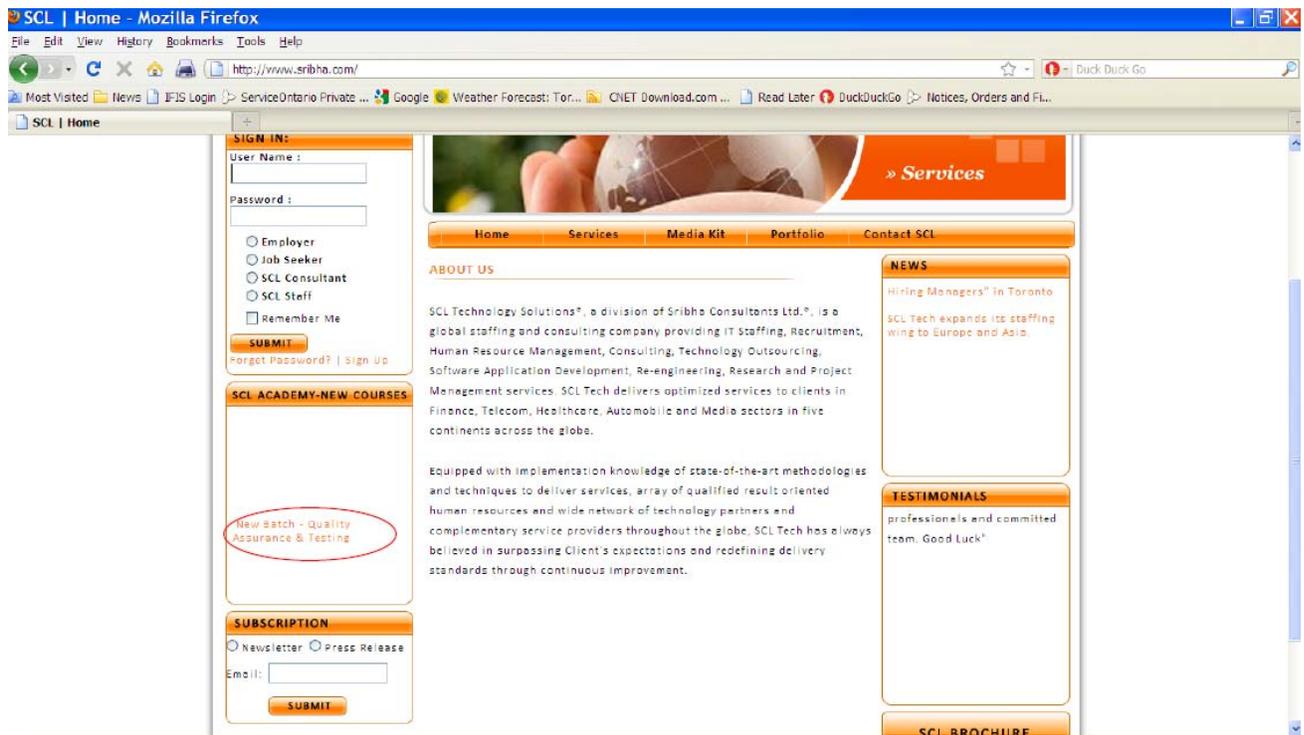
[13] _____ and _____ verified that the School was currently running a Quality Assurance and Software Testing program in the evenings. The current session started on May 16, 2011 meeting every week day from 7 pm to 9 pm. The program is 4 to 6 weeks long (40 – 60 hours). The current program costs a total of \$3,000.00; \$1,500 is required as the first payment with the remaining being invoiced while the program is running.

[14] They also stated that the Software Business Analysis program was running but it was integrated with the Quality Assurance and Software Testing program. No other programs were being offered at this time. A student list was produced showing that 20 students were enrolled in the most recent session. As well, several email receipts for the initial \$1,500 payments were printed out.

[15] and stated the current Quality Assurance and Software Testing program is not the same as the one they are submitting for approval by the Superintendent. They claim the current program is targeting those who have an experienced software background and therefore are seeking upgrading to skills they already possess. When the Designates asked if there was some criteria or testing to verify the skill level of the student prior to entering the program, both replied that there was no current process in place to confirm the student's previous computer experience.

[16] The School's advertising does not state a pre-requisite or that previous experience is necessary. The two employees stated that it would be possible for a student with no computer background to enrol in the program but also stated that the student would have difficulty understanding the concepts of the program without that previous background.

[17] Subsequent to the field visit, on June 23, 2011 a Designate re-visited the website: www.sribha.com and discovered that the home page now had a link to an SCL Academy webpage.



[18] The new webpage displays a link to “Course Catalog” that when clicked produces the following:


[SCL Academy](#) > Software Quality Assurance and Testing

 To search, type and hit enter

[Twitter](#)

Software Quality Assurance and Testing

Program Name: Software Quality Assurance and Testing

Duration: 8 weeks, 2 hours/day, 3 classes/week

Start Dates: Summer, Fall, Winter. Start dates are subject to change

Credential Awarded: Certificate of Quality Assurance

Course Description

Software Quality Assurance practices an effective practice to reduce software costs and increasing customer satisfaction through prevention of product defects. This course emphasizes on understanding the fundamentals of software engineering and development and how the principles of software quality assurance can be employed to optimize software quality. The program is designed to bring new software testers up to speed quickly. Course material introduces students to systematic testing of software systems, software verification, symbolic execution, software debugging, quality assurance, measurement and prediction of software reliability, project management, software maintenance, software reuse, reverse engineering. Course covers from basics to structured software testing methodologies.

Course Requirement

The requirements to enter this program are, at a minimum, a high school diploma or General Education Development (GED) certificate. Familiarity with Windows is preferable but not mandatory.

Fee Schedule

Domestic Students:

Registration Fee (non-refundable)	\$ 288
Tuition Fee	\$ 864
Materials Fee	\$ 288
Total Fee	\$ 1440

International Students:

Registration Fee (non-refundable)	\$ 576
Tuition Fee	\$ 1728
Materials Fee	\$ 576
Total Fee	\$ 2880

Please Note:

- 1) All prices are in Canadian dollars
- 2) Students are eligible to withdraw from the academy with the tuition fee refund within the first week of class.
- 3) SCL Academy reserves the right to change this Fee Schedule without notice.

Course Materials

Curriculum

Week 1

An overview of the maintenance and testing activities within the software Development Life





cycle. This segment of the course will cover the basic concepts of software quality, quality attribute and tradeoffs. (6 hours)

- Introduction to Software
- Software Projects
- What happens in a software firm?
- Software Delivery Models
- Software Architecture
- Types of Software projects
- Types of Software Applications
- Software Development Life Cycle (SDLC)
- SDLC Methodologies
- Implementing SDLC
- Project Teams
- Project Documentation

Week 2

This segment of the course will focus on the strategy to plan quality management activities, how to interpret and act on the results and how to make quality pervasive in an organization. It is an introduction to software availability, measurement and prediction of software reliability. (6 hours)

- Quality Assurance
- Quality Control
- Testing-Introduction
- Process Management
- Business Process Re-engineering
- Process Improvement
- Process Implementation
- Quality Standards
- CMMI, ISO, Six Sigma, ITIL
- Requirements Analysis
- Requirements Review
- Change Management
- Configuration Management

Week 3

Testing strategies, including unit level, path and data flow testing, domain testing, decision tables, and state-based testing. Coverage metrics, impact of object-oriented testing, effort, efficiency, and effectiveness concerns. (6 hours)

- Testing Methodologies
- Manual vs. Automation
- Automation Framework
- Test Plan
- Test Strategy
- Test Approach
- Types of Testing
- Testing tools
- Vendor Analysis
- Test Scenarios

Week 4

This segment of the program covers software testing- test objectives and test coverage, the time frame within which software testing should be conducted and the strategies that are to be used while testing.

- Test Cases and Test Scripts
- Test Data Generation
- Test Environment
- Configuration
- Test Estimates and Scheduling
- Testing Meetings
- Test Documentation
- Test Reports

- Test Execution
- Defect Management
- Defect Life Cycle
- SQL

Week 5

An introduction to QTP, Mercury Winrunner, Loadrunner. QTP is an automated functional Graphical User Interface (GUI) testing tool that allows the automation of user actions on a web or client based and desktop computer application. It is primarily used for functional regression test automation. HP Mercury Winrunner works as part of a functional test suite; it works together with Mercury Interactive WinRunner and HP Quality Center and supports enterprise Quality Assurance. (6 hours)

- UNIX
- Mainframes
- HP Mercury Quick Test Pro
- HP Mercury Quality Center
- HP Mercury Loadrunner
- IBM Rational Functional Tester
- IBM Rational Clearquest
- QA Leadership Skills
- Problem Solving Skills
- Negotiation Skills

Week 6

This segment of the course focuses on team management and teaches students how to effectively work in a team setting. (6 hours)

- Analytical Skills
- Time Management Skills
- Communication Skills
- Presentation Skills
- Team Spirit
- Flexibility
- Strengths
- Weaknesses
- Conflict Resolution
- Handling Pressure
- Non- Verbal Communication

Week 7

Bridging trainees' knowledge and client expectations is an important step towards building a career in the IT field. This segment of the course will provide students support in resume and interview preparations.

- Interpersonal Skills
- Interview preparation
- Interview Management
- Spontaneity
- Illustrations
- Real-time Examples
- Domain Expertise
- Personality Development
- Challenges Faced
- Motivation
- Mapping Knowledge

Week 8

Continuation of week 7

- Work Culture Orientation
- Professional Etiquette
- Mock Interviews

[19] The webpage description of the program clearly states that the course duration is “8 weeks, 2 hours/day, 3 classes/week”. Two hours a day, three days a week equals six hours a week. Six hours a week multiplied by eight weeks equals 48 hours. The total fee listed is \$1,440 for Canadian students and \$2,880 for International students. The website also states that the “requirements to enter this program are, at a minimum, a high school diploma or General Education Development (GED) certificate. Familiarity with Windows is preferable but not mandatory.” The statements contained on the website contradict several statements made by the School’s representatives during the field visit and confirm that indeed the School is offering a vocational program and not an upgrading program.

[20] As a result of both the field visit and the information provided on the website found subsequent to the field visit, the Designate came to the conclusion that the School is advertising a vocational program. Despite the claims that the School is only providing an upgrading program, when the curriculum for the program currently being delivered and the curriculum for the program the School intended to submit for the Superintendent’s approval were compared, very little difference could be discerned. The program clearly meets cost and length requirements as outlined in Sec. 9(1) of Ontario Reg. 415/06.

[21] The Superintendent therefore finds that the School is advertising a vocational program that requires approval by the Superintendent under the Act, in contravention of Section 11 (2) of the Act.

B. Prohibition against providing unapproved vocational programs, contrary to section 8(1) of the Act

[22] A field visit to 1280 Finch Avenue West, Suite 602, Toronto was conducted on May 26, 2011. Two employees of Sribha consultants met with Designates to determine

what programs were being offered and whether these programs were vocational therefore needing approval by the Superintendent

[23] and verified that the School was currently running a Quality Assurance and Software Testing program in the evenings. The current session started on May 16, 2011 meeting every week day from 7 pm to 9 pm. The program is 4 to 6 weeks long (40 – 60 hours). The current program costs a total of \$3,000.00; \$1,500 is required as the first payment with the remaining being invoiced while the program is running.

[24] They also stated that the Software Business Analysis program was running but it was integrated with the Quality Assurance and Software Testing program. No other programs were being offered at this time.

[25] A student list was produced showing that 20 students were enrolled in the most recent session. As well, three email receipts for the initial \$1,500 payments were printed out.

First page of three-page student list:

7pm - 9pm

BATCH

ORIENTATION SESSION

May 16 2011				
S.NO	First Name	Last Name	Phone Number & Email ID	Address
1)				
2)				
3)				
4)				
5)				
6)				
7)				
8)				
9)				

One of three email receipts printed by the School:

From: [REDACTED]
Sent: May-16-11 10:58 AM
To: [REDACTED]
Subject: RE: Money Payment

Hi,

This is a confirmation that you have paid us \$1500.

Thanks and Regards

[26] [REDACTED] and [REDACTED] stated the current Quality Assurance and Software Testing program is not the same as the one they are submitting for approval by the Superintendent. They claim the current program is targeting those who have an experienced software background and therefore are seeking upgrading to skills they already possess. When the Designates asked if there was some criteria or testing to verify the skill level of the student prior to entering the program, both replied that there was no current process in place to confirm the student's previous computer experience.

[27] The School's advertising does not state a pre-requisite or that previous experience is necessary. The two employees stated that it would be possible for a student with no computer background to enrol in the program but also stated that the student would have difficulty understanding the concepts of the program without that previous background.

[28] Subsequent to the field visit, on June 23, 2011 a Designate re-visited the website: www.sribha.com and discovered that the home page now had a link to an SCL Academy webpage. (see paragraphs 14 and 15 for captured images of website pages).

[29] The webpage entitled "Course Catalog" clearly states that the course duration is "8 weeks, 2 hours/day, 3 classes/week". Two hours a day, three days a week equals six hours a week. Six hours a week multiplied by eight weeks equals 48 hours. The total fee listed is \$1440 for Canadian students and \$2880 for International students. The

website also states that the “requirements to enter this program are, at a minimum, a high school diploma or General Education Development (GED) certificate. Familiarity with Windows is preferable but not mandatory.” The statements contained on the website contradict several statements made by the school representatives during the field visit and confirms that indeed the school is offering a vocational and not an upgrading program.

[30] The Superintendent therefore finds that the School is currently offering a vocational program that requires approval by the Superintendent in contravention of Section 8 of the Act.

C. Prohibition against operating a private career college, contrary to section 7 of the Act

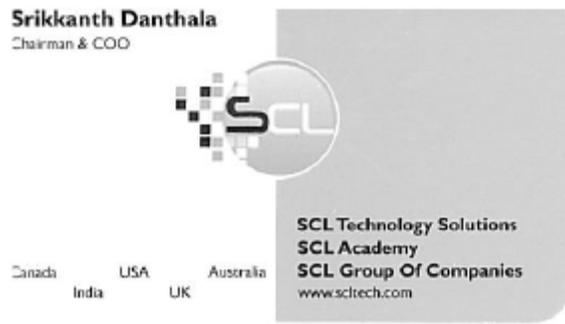
[31] Sribha Consultants, at the time of the field visit on May 26, 2011, had students attending an evening class in Quality Assurance and Software Testing at Suite 602, 1280 Finch Avenue, Toronto and in fact provided a copy of the student list for the Designates.

[32] The School representatives provided receipts for payment received for the Quality Assurance program.

[33] The School representatives also provided the names of the two instructors of the Quality Assurance program, one of which is the Chairman and COO of SCL Academy.



Regional Headquarters - North America	Corporate Headquarters
280 Finch Avenue West, Suite 602	145 Traders Blvd, Suite 1 & 2
Toronto, Canada	Mississauga, Canada
Phone: 416 661 5200	Phone: 905 890 5300 ext: 224
Fax: 416 661 5201	Fax: 905 890 5304
Cell: 416 648 5370	Email:



[34] Ste. 602, 1280 Finch Avenue W. is the location listed under “Contact” on the Sribha Consultant’s website. The website lists SCL Academy as a service being offered by SCL Technology Solutions. SCL Technology Solutions Ltd. is a registered Ontario corporation with the same corporate address and the same directors as Sribha Consultants Ltd

[35] SCL Academy’s online brochure lists its address as 1280 Finch Avenue W, Suite 602, Toronto, Ontario:

SCL ACADEMY

Optimizing Education - Redefining Careers[®]



Training and Placement Brochure

SCL Technology Solutions

1280 Finch Avenue W, Suite 602
Toronto, ON M3J-3K6, Canada

Phone: (416)661-5200 Fax: (416)661-5201

www.scltech.com

sclacademy@scltech.com

[36] On the Ontario Business Information System (ONBIS), SCL Academy was registered as a Business Name under Sribha Consultants Ltd. on November 9, 2009 with the same address as the corporation (Suite 602, 1280 Finch Avenue, Toronto) and “activity carried on” listed as “Private Career College.”

[37] The School has offered, provided, advertised and charged fees for a vocational program in Ontario, and maintains a physical presence in this province.

[38] The Superintendent therefore finds that the School was operating an unregistered Private Career College, contrary to s. 7 of the Act.

PRIOR CONTACT WITH THE MINISTRY

[39] On December 2, 2010 Sribha Consultants Ltd. pre-screened a Software Quality Assurance Testing program. The school was sent a response letter on December 3, 2010 stating that approval was required for the program.

[40] The school started inputting the program in RICC, however the status of the submission remains “in progress” and no hardcopy registration material or registration payment has been received by the Ministry.

INVESTIGATIVE METHODS USED

[41] In obtaining the above evidence the investigator conducted electronic searches for online information and advertising about the School. This allows the Designate to see how the School markets itself to consumers. Generally speaking, findings are based on advertising supplied or controlled directly by the School, rather than third party sources of information over which the School may exercise little control.

[42] The investigator used authority provided under Sec. 38 of the Act. The Act states that “...if in the Superintendent’s opinion, a person that is not a registrant is or was required to be registered, the Superintendent or person designated by the Superintendent may make such inquiries and conduct such examinations of the person’s affairs as the Superintendent or designate considers appropriate in the circumstances.” This can entail a field visit to the school, photographing the premises, inspection of documents, interviewing both staff and students, and removal or copying of any material, either electronic or paper, which the investigator feels is relevant to the investigation or inquiry. Use of these authorities allows the investigator to obtain

information about the school's activities which assists the Superintendent in reaching a determination.