

Tertiary Education Commission

Peter Minturn Goldsmith School PTE

March 2015

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Sponsor:

Graeme Cahalane (Tertiary Education Commission, Manager,
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1. Executive summary

In accordance with our Contract for Services signed in December 2014 we performed an assessment of the Peter Minturn Goldsmith School PTE on behalf of the Tertiary Education Commission.

Background

The Tertiary Education Commission (“TEC”) requested PwC to undertake a focused assessment of a selected Private Training Establishment (“PTE”) Peter Minturn (New Zealand) Goldsmith School Limited (“Goldsmith School”) following the questions around its consistent high course completion rate.

The Goldsmith School is a PTE that is based in Auckland and provides specialised training in skills of the commercial goldsmithing and jewellery manufacturing.

Peter Minturn Goldsmith School delivers three progressive qualifications which are funded by the TEC through the Student Achievement Component (“SAC”) funding since 2004. These qualifications include:

- Certificate in Pre-Apprenticeship Goldsmithing and Jewellery (Level 4)
- Diploma in Goldsmithing and Jewellery (Level 5)
- Diploma in Goldsmithing and Jewellery (Advanced) (Level 6).

Objective and scope of this engagement

TEC engaged PwC to assess Peter Minturn Goldsmith School Limited compliance with the TEC student achievement component funding requirements.

This included an assessment of the processes and procedures used by the Goldsmith School to administer the SAC funded programmes and covered

students’ admission and enrolment, attendance, assessment and qualification completion processes.

The scope of this engagement included the three primary qualifications (specified above) delivered by Peter Minturn Goldsmith School over the period 2012 – 2014.

Peter Minturn Goldsmith School overview

Peter Minturn Goldsmith School is a family owned small private training establishment which delivers three progressive qualifications in goldsmithing and jewellery.

The Goldsmith School headcount includes seven full time employees; where four of them are members of the Minturn family responsible for overall management and administration functions (apart from 9(2)(a) who is also involved in tuition process), two employees are tutors and one employee is a consultant in the financial area.

Each qualification at Levels 4, 5 and 6 requires 40 weeks of study and takes one year to complete. Qualifications are progressive and students often after completing the Level 4 continue their study at Levels 5 and 6.

The Goldsmith School maximum capacity is 22 students per year across all three qualifications. In the year of 2014 there were 18 students enrolled with the School, including 8 students on Level 4, 7 students on Level 5 and 3 students on Level 6.

The Goldsmith School don’t have an automated student management system; the record keeping process is manual and supported by Excel spreadsheets and hard copy documents.

Key observations

Our engagement considered how the Goldsmith School ensures compliance with the TEC student achievement component funding requirements in relation to the admission, enrolment, assessment and qualification completion processes.

Our procedures included testing of a sample of 30 students who have been enrolled with the School to achieve goldsmithing and jewellery qualifications at Levels 4, 5 and 6 during the period of 2012 – 2014; interviews with the selected students and employees of the Goldsmith School. The sample we selected is detailed in the Appendix A to this report.

Our key observations from this engagement are summarised below. For detailed results of the procedures performed refer detailed observations section in this report.

1. Attendance requirements for SAC funded students

Each qualification delivered by Peter Minturn Goldsmith School takes approximately one year to complete and includes four terms of 10 weeks each. It is expected that students spend 40 hours per week and 40 weeks per year to achieve the qualification.

Students sign on their arrival and departure time in the “Full Time Roll” document on a daily basis. This information is subsequently entered into Excel spreadsheet to calculate students’ attendance rate which is included in the final score for each student. We noted that there is no formal requirement of a minimum attendance rate.

2. Single Data Return verification and submission

Single Data Returns (‘SDR’) are prepared for Peter Minturn Goldsmith School by Z&M Numerics bureau on the base of a contract. Z&M prepare required SDR reports on the base of the information provided by the Goldsmith School in Excel spreadsheets.

The SDR reports include Summary Report Certification and Authorisation (current student profile), Course Completion for the return period, and Student Enrolment Summary reports.

These reports are verified and confirmed by the Goldsmith School before being submitted to the Ministry of Education and Tertiary Education Commission. However, we noted that the verification process was inconsistent and resulted in a discrepancy in the 2013 SDR report.

We reconciled student completion status reports kept by the School with the information submitted in the SDR reports for the period 2012 - 2014 and noted that the number of qualified students in the 2013 SDR report was 19, however, according to the School records there were only 18 students who have successfully completed the qualification that year.

The discrepancy has not been identified by the Goldsmith School and indicates that the existing controls used to verify and confirm SDR reports are not fully effective and require improvements.

Overall comments

Based on the testing of documentation provided to us and interviews with Peter Minturn Goldsmith School employees and selected students, we did not identify major cases of non-compliance with the student achievement component funding requirements, except for:

- The incorrect SDR report submitted in 2013, and
- No formal requirement for a minimum attendance rate.

Acknowledgment

We would like to thank the Peter Minturn Goldsmith School team for their cooperation and support during our engagement. If you have any questions regarding this engagement, please do not hesitate to contact me.

Section 9(2)(a) of the OIA

12 March 2015

Date

David Nalder
Partner
Wellington
PricewaterhouseCoopers

Overall management comment:

The School is pleased with the focus review outcomes and will continue to identify and improve its processes to continue to offer excellent learning outcomes.

In response to the Key Observations:

1. Attendance requirements for SAC funded students

Achievement criteria for the qualifications offered have been approved by NZQA and these are based on students overall marks. There is no requirement for attendance in this approval.

However, given the Jewellery Trade is in the midst of a Targeted Review of Qualifications the School will give consideration to the inclusion of an acceptable minimum attendance rate in the programme development and resubmission in 2015.

2. Single Data Return verification and submission

The error was notified to Z&M Numeric the day after it was found and the SDR return corrected accordingly.

A second review of the reports prepared by Z&M Numeric will be put in place to help mitigate the risk of any future clerical errors.

2. Detailed Observations

SAC funding requirements	Procedures performed	Observations
1. Student admission and enrolment processes		
<p>The TEC Student Achievement Component funding requires compliance with the following rules in relation to students:</p> <ul style="list-style-type: none"> • Student has to have domestic student status (Rule ENR002) • Peter Minturn Goldsmith School ('PMGS') must keep admission records that (Rule ENR026): <ul style="list-style-type: none"> • confirm whether they have admitted, re-admitted or not admitted each learner • are an auditable record of admission decisions with relevant documentation until the period has passed in which learners may appeal against an admission decision • PMGS must verify learner (EFTS greater than 0.03) full legal name, date of birth, gender, citizenship or residency status (Rule ENR028) and must record sightings of documents of identity, date of birth, citizenship and residency (the person who sighted the documents must sign and date the learner's enrolment record) (Rule ENR031) • PMGS must access the National Student Index (NSI) and complete the following (Rule ENR036): 	<p>For a sample of SAC funded students enrolled with Peter Minturn Goldsmith School ('PMGS') to achieve qualifications in Goldsmithing and Jewellery during the period 2012 – 2014 we performed the following:</p> <p>a) Checked that student domestic status, identity and citizenship have been verified by PMGS (copies of sighted documents were provided).</p> <p>b) Checked that there was documented evidence confirming that PMGS has checked students' eligibility for entering the programme and that admission/entering criteria have been met.</p> <p>c) Confirmed that enrolled students have NSNs.</p>	<p>For a sample of 30 SAC funded students enrolled with PMGS to achieve qualifications in Goldsmithing and Jewellery at Levels 4, 5 and 6 during the period 2012 – 2014 we have performed procedures specified in this table and obtained the following results:</p> <p>a) During the admission and enrolment process PMGS verifies student's domestic status (Australia, NZ, Pacifica islander passport holder or NZ permanent resident) by sighting the original Passport or birth certificate. Sighted documents are copied by the School and each student has to declare on his/her domestic status on the enrolment form. For the selected 30 students we obtained and inspected copies of their ID documents and enrolment forms. No exceptions were noted.</p> <p>b) Admission process includes audition and performing three practical exercises (make a square, a swaged "D" shaped wedding ring and a Star of David). The admission decision is recorded and signed off by the tutor on the Audition record or Learner Achievement Document (for the concurring students at Levels 5 and 6). We obtained and inspected signed Audition records and Learner Achievement documents for all 30 selected students. No exceptions were noted.</p> <p>c) We confirmed that all 30 selected students had NSNs.</p>

SAC funding requirements	Procedures performed	Observations
1. Student admission and enrolment processes		
<ul style="list-style-type: none"> • For learners without a National Student Number (NSN), assign an NSN and create the NSI record • For learners with an NSN, update the NSI record, if appropriate. • PMGS must meet the requirements of the Education Act 1989 in relation to admission and enrolment (Rule ENRo42): <ul style="list-style-type: none"> • The TEO provides information on qualifications, including courses • The learner applies to the TEO for admission and enrolment (separately or together) • The TEO verifies the learner's identity and citizenship • The TEO confirms the learner's eligibility to study • The TEO makes a formal offer to enrol the learner on a course or programme of study • The learner formally accepts the offer by signing it • The TEO records the enrolment • The TEO invoices the learner for any tuition fees • The learner pays any tuition fees or arranges for them to be paid 	<p>d) Checked that students had formal offer of enrolment issued and signed by PMGS.</p> <p>e) Checked that there was a documented evidence of the tuition fees (if applicable) payment by a student.</p> <p>f) Checked that students received documented confirmation of enrolment (receipt for payment for fees/course costs; or a student identification card; or a letter with details of the learner's courses) and enrolment contract signed by the student and PMGS.</p> <p>g) Checked for withdrawn students that there were relevant records, confirming withdrawals</p>	<p>d) PMGS makes a formal offer in the form of an Acceptance Letter. Prospective students have to formally accept the letter by returning signed confirmation. We obtained and inspected Acceptance Letters for 30 selected students, no exceptions noted.</p> <p>e) Students apply for a student loan from studylink or pay to the Public Trust directly (if self-funded). PMGS perform verification for students who apply for loans from studylink. For loans, the money will transfer to public trust from studylink. Public Trust pays PMGS on installment. PMGS provide the student with an enrolment form which is signed by the student first. School signs the form and finalises enrolment upon receipt of a payment confirmation (payment schedule) from the Public Trust. These documents are kept in student basic information file. Inspected payment confirmations for selected 30 students, no exceptions were noted.</p> <p>f) Student enrolment is documented on the enrolment form which is signed by the student and PMGS. PMGS also issues a student identification card. We obtained and inspected enrolment forms for selected 30 students and ensured that the documents were signed both by PMGS and students, no exceptions were noted.</p> <p>g) Students' withdrawal happens very seldom. There was one case in 2006 and another one this year. Status of the withdrawn students is indicated on the student file and in the Excel spreadsheet.</p>

SAC funding requirements	Procedures performed	Observations
1. Student admission and enrolment processes		
<ul style="list-style-type: none"> • The TEO records payment of any fees and any changes to enrolment, including withdrawal and refunds • The learner attends the course(s) beyond the period when a withdrawal with a refund applies • PMGS may make an enrolment offer in writing or electronically (Rule ENRO51) and must sign learners' enrolment forms, on paper or electronically, to declare the documentation is accurate and complete (Rule ENRO55) • PMGS must confirm a learner's enrolment by one the issue of a receipt for payment for fees/course costs; or issue of a student identification card; or a letter with details of the learner's courses and must validate learners' signed enrolment forms by countersigning them (Rule ENRO58) • PMGS must record domestic student and trainee withdrawals (Rule ENRO77) 		

SAC funding requirements	Procedures performed	Observations
2. Process around student attendance in programme and qualification completion		
<p>PMGS must record the following details of each learner's programme of study (Rule ENR089):</p> <ul style="list-style-type: none"> Confirmation of the learner's application, admission, enrolment contract and payment of tuition fees and associated costs The qualification(s) in which the learner is enrolled for the current and previous teaching periods The courses in which the learner is enrolled for the current and previous enrolment periods The programme or major in which the learner is enrolled, if relevant The enrolment period for which the learner is enrolled, including the start and end dates of the teaching period Attendance or submission of work to demonstrate the valid enrolment status of each learner in relation to whom Student Achievement Component funding is claimed <p>PMGS must record learner results and report on result information as follows (Rule ENR091):</p> <ul style="list-style-type: none"> The main assessment results of courses and/or qualifications for the enrolment period 	<p>For a sample of SAC funded students enrolled with PMGS we performed the following:</p> <p>h) Checked that there were records confirming student's application, enrolment and payment in a student management system</p> <p>i) Checked that there were records of courses/ programmes in which student is enrolled; including start and end dates of the teaching period</p> <p>j) Checked that there were records of student attendance of the course</p>	<p>For a sample of 30 SAC funded students tested in accordance with procedures specified in this table the following results were obtained:</p> <p>h) Students' application and enrolment contract are in the form of "Enrolment Form" with both parties' signature. Admission is in the form of "Acceptance Letter" and attached "Letter for Student Loan" with School's letterhead and Section 9(2)(a) of the OIA's signature. Payment of tuition fees and associated costs is recorded in the "Fee Protect School Trust Account Application" to Public Trust and "Payment Schedule" with both parties signature. Public Trust provides a "Receipt" on the money received for the tuition fee. Enrolment forms and payment confirmations are kept by the school in hard copies; Letter (Acceptance and Student Loan) are kept in soft copies, for results of our testing refer (d) – (f) above. No exceptions noted.</p> <p>i) For 30 selected students obtained and inspected their Induction program signing off paper which included Term plan, local course exercise list, exam rules, and student manual. Confirmed start and end dates of the teaching periods. No exceptions noted.</p> <p>j) Student attendance is manually recorded in a "Full Time Roll" document. Students are required to sign this document when they arrive or leave the building. Students' hours are daily entered into Excel file and summarized on a term and annual basis. Obtained and inspected Full Time Roll documents for selected students, no exceptions noted. We also noted that there is no minimum requirement of attendance; however we didn't identify any major gaps in the</p>

SAC funding requirements	Procedures performed	Observations
2. Process around student attendance in programme and qualification completion		
<ul style="list-style-type: none"> • Other relevant academic information, for example scholarships awarded • Information required for reporting to the Ministry of Education and the Tertiary Education Commission in the Single Data Return • Information required by StudyLink for learners who apply for student allowances and loans. 	<p>k) Checked that there was an evidence of students' submission of work</p> <p>l) Checked that there were records of students' submission of work and results of assessments supporting student qualification completion.</p>	<p>attendance records of the students selected for testing. According to our discussions with the PMGS employees, records of attendance are included in the final score calculation which impacts student's achievement of the qualification.</p> <p>k) "Student Record Sheet" is used to record the score of all exercises during the year of study. Each exercise has a detailed Course content with assessment and comments. "Student Exam Record Sheet" is a paper sheet to record the exam scores, Design, Written and Practical exams. Design exam is a customised work of design with criteria listed. Written is to write answers for 30 questions. Practical is make a ring or jewellery based on a picture and other requirements. For selected 30 students we obtained and inspected Course Content Student record sheets and student exam record sheets. No exceptions were noted.</p> <p>l) As per testing above, for all 30 selected students we were provided with sufficient documented evidence confirming submission of required work and performing assessments to support the qualifications granted.</p>

SAC funding requirements	Procedures performed	Observations
3. Interviews with the students		
N/A	<p>We performed the following procedures in relation to 30 SAC funded students selected for testing:</p> <ul style="list-style-type: none"> m) Contacted the student (either by phone or via face-to-face interview) n) Verbally confirmed student identity o) Verbally confirmed that student had studied at PMGS (confirmed programme name, year of study) p) Checked if there was an admission process (eg interview) before enrolment q) Checked if attendance was required r) Checked if student has been assessed during the study s) Asked for any feedback on PMGS 	<p>We obtained contact details for 30 SAC students selected for testing and attempted to contact them, the following results were achieved:</p> <ul style="list-style-type: none"> m) We were able to contact all 30 students; with 9 of them we conducted face-to-face interviews and with 21 of them we conducted phone interviews. n) All 30 interviewed students verbally confirmed their identity. o) All 30 students confirmed that they studied at PMGS (including year of study and programme name). p) All 30 students confirmed that they had an audition process including practical exercises before they were enrolled with PMGS. q) All 30 students confirmed that they had to attend regularly to be up to speed with their study; attendance was recorded in the “Full time Roll” document. r) All 30 students confirmed that they have been regularly assessed during their study in accordance with their training plans, these included theoretical and practical assessment, and final exams. s) All 30 students provided positive feedback on their experience with PMGS.

Appendix A

3. Sample selection

SAC funded programmes

A sample of students for testing was selected from the report provided by TEC and showing all students enrolled with Peter Minturn Goldsmith School during the period 2012 – 2014. This includes all students enrolled in Certificate in Pre-Apprenticeship (Level 4), Diploma in Goldsmithing and Jewellery (Level 5), Diploma in Goldsmithing and Jewellery Advanced (Level 6). Per agreement with TEC we sampled 10 students per each qualification. Therefore we have selected 30 students from three qualifications over the period of 2012 – 2014.

#	Programme/ Qualification Name	Student NSN	FTSE (Full Time Student Equivalent)		
			2012	2013	2014
1	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery	Removed under section 9(2) (a) of the OIA		1	
2	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery				1
3	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery		1		
4	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery			1	
5	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery				1
6	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery			1	
7	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery				1
8	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery		1		
9	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery		1		
10	Certificate in Pre-Apprenticeship Goldsmithing and Jewellery		1		
11	Diploma in Goldsmithing and Jewellery				1
12	Diploma in Goldsmithing and Jewellery			1	
13	Diploma in Goldsmithing and Jewellery		1		
14	Diploma in Goldsmithing and Jewellery				1
15	Diploma in Goldsmithing and Jewellery		1		
16	Diploma in Goldsmithing and Jewellery			1	

#	Programme/ Qualification Name	Student NSN	FTSE (Full Time Student Equivalent)		
			2012	2013	2014
17	Diploma in Goldsmithing and Jewellery	Removed under section 9(2) (a) of the OIA		1	
18	Diploma in Goldsmithing and Jewellery		1		
19	Diploma in Goldsmithing and Jewellery			1	
20	Diploma in Goldsmithing and Jewellery			1	
21	Diploma in Goldsmithing and Jewellery (Advanced)		1		
22	Diploma in Goldsmithing and Jewellery (Advanced)			1	
23	Diploma in Goldsmithing and Jewellery (Advanced)			1	
24	Diploma in Goldsmithing and Jewellery (Advanced)		1		
25	Diploma in Goldsmithing and Jewellery (Advanced)		1		
26	Diploma in Goldsmithing and Jewellery (Advanced)		1		
27	Diploma in Goldsmithing and Jewellery (Advanced)			1	
28	Diploma in Goldsmithing and Jewellery (Advanced)				1
29	Diploma in Goldsmithing and Jewellery (Advanced)				1
30	Diploma in Goldsmithing and Jewellery (Advanced)				1

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