

# TEC Investigation Report – Sobieski Consultants (Training Division) Limited

#### **Executive Summary**

- 1. In November 2018, the Tertiary Education Commission Te Amorangi Mātauranga Matua (TEC) completed a review of Sobieski Consultants (Training Division) Limited's (Sobieski's) single data return (SDR) submissions from 2015 to 2018. The review identified anomalies with 29 students who were enrolled in NC5432 National Certificate in Employment Skills (Level 1) (Youth Guarantee programme).
- 2. As a result we initiated an investigation to verify enrolments at Sobieski for 2015 to 2018. TEC staff visited Sobieski and completed this work in November 2018. Our review of Sobieski's enrolment records showed that due to the use of generic programme start and end dates, when students were rolled over into the following year, records were being incorrectly entered twice in the SDR.
- 3. The result was that Sobieski erroneously reported students in the SDRs as successfully completing the same courses twice, claiming TEC funding each time.
- 4. Sobieski also claimed funding for recognition of prior learning, which TEC does not fund, and for one student who at the age of 15 was below the eligibility threshold of 16 years.
- 5. As a result Sobieski is required to repay TEC \$111,375.52 (GST exclusive) in over-funding received during the 2016 to 2017 years.
- 6. Sobieski responded that this duplication of enrolments on the SDR occurred due to an administrative error when importing the information into its Student Management System (SMS).
- 7. On 4 February 2019, Sobieski requested NZQA to cancel its registration as a PTE. From this date, Sobieski is no longer NZQA registered and therefore cannot receive TEC funding.

#### **Background**

- 8. Sobieski was a registered private training establishment (PTE) from 1 April 1993 to 4 February 2019. Most recently it offered one Youth Guarantee (YG) programme (NC5432 Employment Skills Level 1) that was funded by the TEC.
- 9. Sobieski is located at 42 Main Street, Awanui, in Northland.
- 10. The table below provides a breakdown of TEC funding for 2016, 2017 and 2018:

| Fund            | <b>2016</b> \$ GST exclusive | <b>2017</b> \$ GST exclusive | <b>2018</b> \$ GST exclusive |
|-----------------|------------------------------|------------------------------|------------------------------|
| Investment Plan |                              |                              |                              |
| Youth Guarantee | 222,443                      | 192,413                      | 192,413                      |
| Total           | 222,443                      | 192,413                      | 192,413                      |

- 11. An analysis of Sobieski's SDR returns found that 29 students over the 2015-2018 years were reported as being enrolled in, and having completed the same course twice, indicating that Sobieski may have been overfunded.
- 12. From November 2018, under section 159YG (6), the TEC stopped Sobieski's monthly payments for the rest of the year to avoid incurring in any further potential debt.
- 13. To determine the extent of the issues, we initiated an investigation into Sobieski.

#### **Investigation Scope**

- 14. The scope of investigation looked at the organisation's compliance with Youth Guarantee funding conditions from 2015 to 2018, specifically:
  - > Student enrolments, including eligibility
  - > How information is recorded in the organisation's SMS
  - > Attendance records and course completion reporting
  - > Reporting of information through the SDR
  - > How courses were delivered by the organisation
- 15. TEC undertook interviews at Sobieski's office in Awanui with the Managing Director and Administrator.

#### **Investigation findings**

#### Students reported twice for the same courses

- 16. The investigation confirmed that 29 students in the sample of records reviewed were reported twice in the SDR between 2015 and 2018 as successful completions, with no adjustment to the EFTS delivered.
- 17. Sobieski allows for rolling enrolments, i.e. When Sobieski reports students through the SDR, it uses generic programme start and end dates of January to December. This means that students can start at any time during the year and will be rolled over into the following year to complete the remainder of their programme.
- 18. Consequently, when students are rolled over into the following year, Sobieski reports the same information again in the following year's SDR. This has resulted in students being reported as successfully completing the same courses twice. This practice is a breach of funding conditions in relation to supplying information through the SDR.<sup>1</sup>
- 19. Sobieski responded that the duplication of enrolments on the SDR occurred due to an administrative error when importing the information into its SMS.

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 $<sup>^{\</sup>mathbf{1}}$  This is demonstrated with an example in Appendix  $\mathbf{1}$ 

#### **Recognition of Prior Learning (RPL)**

- 20. As part of the enrolment process, Sobieski prints out the student's NZQA Record of Achievement and checks for any unit standards the student may have already achieved. This is recorded in a spreadsheet to ensure that the student does not re-sit that particular unit standard.
- 21. However, Sobieski has not adjusted the EFTS value in the SDR to ensure that funding is not claimed for any prior learning. This is a breach of Youth Guarantee funding condition 4.7 which states:

You must not seek YG Fund Funding for recognised prior learning credited to a student. To ensure that you are able to comply with this Condition, you must:

- (a) ask a student to specify prior learning he or she has undertaken,
- (b) before admitting each student into the programme, review that information as it relates to each student, and
- (c) retain documents that confirm that the student has demonstrated the required knowledge or skill.
- 22. From the sample of 29 student records reviewed, Sobieski had recorded in their spreadsheet 11 students who already had prior learning for which it claimed funding.

#### Age Eligibility

- 23. Our analysis also identified one instance where a student did not meet the age eligibility criteria for Youth Guarantee funding. Requirements for age eligibility are contained in funding condition YG 4.1(b)(iv), which states:
  - (b) You must ensure that a student enrolled in a Youth Guarantee provision programme for which YG Fund Funding is being used is a student who meets and continues to meet the following eligibility criteria:

...

(iv) is either:

A. aged 16 to 19 years (inclusive) at the time he or she commences the Youth Guarantee programme; or

- B. 15 years of age at the time he or she commences the Youth Guarantee programme, and has an early leaving exemption from his or her school, that has been approved by the Ministry of Education.<sup>2</sup>
- 24. We identified one student who was 15 at the time the student began the course. This is below the eligibility threshold of 16 years old, and we did not sight an early leaving exemption from the school or from the Ministry of Education.

#### **Funding Implications**

25. As a result of the issues identified, Sobieski was over-funded by \$111,375.52 for the 2016 and 2017 years.

<sup>&</sup>lt;sup>2</sup> The relevant funding conditions are YG009 (2014), YG010 (2015), Youth Guarantee eligible student definition (2016), Funding condition 5.1(a)(iv) (2017), Funding condition 4.1(a)(iv) (2018) and Funding Condition 4.1(b)(iv) (2019).

#### Sobieski has ceased its operations

- 26. Their remaining students completed their programme of study in December 2018.
- 27. On 11 February 2019, the TEC received confirmation from NZQA that Sobieski had voluntarily cancelled its registration, dated 4 February 2019.
- 28. With effect from 4 February 2019, Sobieski is no longer a registered PTE and has ceased operations.

#### **Next steps**

29. Sobieski is now an unregistered PTE and therefore cannot receive TEC funding.

#### **Conclusion**

- 30. The testing of 29 students undertaken has shown that Sobieski erroneously claimed funding twice for 29 students, and therefore need to repay \$111,375.52 (GST exclusive) to the TEC.
- 31. The TEC will work with Sobieski to determine how to best proceed.
- 32. Sobieski staff have been open during the investigation process and have taken efforts to rectify any issues. They assisted the TEC throughout the investigation by providing access to information, completing documentation where required and answering questions.

### **Appendix 1: Dual enrolments in the SDR**

#### **Supply of Information**

- 33. Section 159YC(1) of the Act provides that a tertiary education organisation (TEO) that receives funding must supply to the TEC, from time to time, in the form specified by the TEC, any financial, statistical, or other information that the TEC requires the TEO to supply.
- 34. In line with the Act, the funding letters that were provided to Sobieski specified the following funding condition:

TEO to supply enrolment information to the TEC

Single Data Return (SDR)

- (a) You must:
  - (i) supply to us information about each student enrolled in a course by completing the fields in the SDR in accordance with the SDR Manual and its appendices, and
    - (ii) submit the information on or before the date we specify.
- (b) You must submit the SDR through the Services for Tertiary Education (STEO) website. For more information, please refer to the SDR Manual and SDR Appendices.<sup>3</sup>
- 35. The SDR Manual provides that the responsibility for checking the integrity of the data provided rests with the TEO. To ensure the integrity of the data, TEOs are required to undertake data validation checks, to see any inconsistencies that arise in comparing frequency counts from previous years' data, and to correct errors before submitting the data.
- 36. Since 2015, manager directors are required to sign off the summary reports for all SDR submissions.

#### **SDR Manual**

- 37. The SDR manual highlights two relevant scenarios when reporting for students for course completions:
  - > Completed course successfully By the extraction date, the learner has met the requirements for successful completion as set out in the approved course descriptor or outline. This student enrolment will be captured as a course completion in the SDR return outline. This student enrolment will be captured as a course completion in the SDR return.
  - > **Still to complete course** valid extension or grade not yet available. By the extraction date, the completion date for the course has passed but an extension or resubmission has been granted or the grade is not yet available. A completion will be returned in a later SDR.
- 38. The supply of information through the SDR by Sobieski highlighted the following irregularities relating to enrolments in the same course occurring twice.

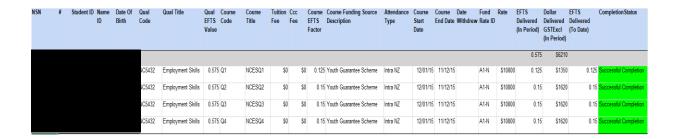
#### **Dual** "successful" enrolments

39. In several instances, Sobieski recorded that the student "completed the course successfully" in final SDRs for two consecutive years. The following SDR extracts highlight how the student was reported in the December 2015 and then in the December 2016 SDR:

<sup>&</sup>lt;sup>3</sup> The relevant funding condition is YG 2 (a)(i) and (ii), and YG 2 (b)

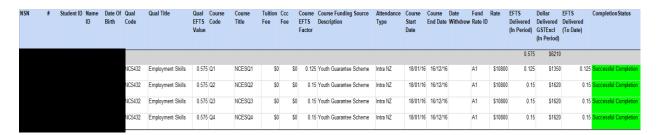
 $<sup>^4</sup>$  As per enrolment records, the student's start date was 14/04/2015 and end date was 14/04/2016.

#### **December 2015 SDR extract**



- 40. Based on how the PTE teaches out the programme, the student completed courses Q2, Q3 and Q4 in 2015 (as these courses are generally taught from April onwards). The student then returned in 2016 to complete course Q1.
- 41. In the December 2015 SDR (above), the student was reported as successfully completing all four courses. This reporting is not correct. In reality the student only successfully completed courses Q2, Q3 and Q4.
- 42. Course Q1 must be reported with the course completion indicator 'Still to complete course course end date not yet reached'.
- 43. When the PTE submitted the December 2016 SDR (below), they reported the same student as successfully completing all four courses again. This reporting is not correct. In reality the student only completed course Q1 in 2016, and as such, only course Q1 should be reported in the December 2016 SDR with the relevant completion indicator.

#### **December 2016 SDR extract**



- 44. Our analysis showed that the above situation occurred for 29 students from 2015 to 2018.
- 45. Sobieski had students enrolled twice in the same course for two consecutive years, when they already appeared as successfully completing the course in the first enrolment.
- 46. As a result of the way in which Sobieski reported students in the SDRs, funding was incorrectly claimed. Sobieski claimed funding twice by reporting the same students in two December SDRs. The 'Dollar Delivered' field indicates the TEC funding for each course.

## **Appendix 2: List of RPL testing**

The following table includes the 11 students where Recognised Prior Learning was identified. The RPL units are highlighted in yellow.

|    | COURSE CODE Q1 0.125 EFTS |                 |                            |                                 |                                 |                           |                            | C                          | OURSE C                    | ODE Q2                     | 0.15 EFT                   | rs                        |                           | COUR                       | SE CODI                         | E Q3 0.15                       | 5 EFTS                          |                            |                            | COUR                            | RSE CODI                        | E Q4 0.1                        | EFTS                            |                          |                          | Total                |                                   |
|----|---------------------------|-----------------|----------------------------|---------------------------------|---------------------------------|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------------|---------------------------|----------------------------|---------------------------------|---------------------------------|---------------------------------|----------------------------|----------------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------------|--------------------------|----------------------|-----------------------------------|
| #  | NSN                       | Student<br>Name | 2780<br>(3<br>credit<br>s) | 2469<br>9<br>(2<br>credit<br>s) | 2470<br>9<br>(3<br>credit<br>s) | 496<br>(3<br>credit<br>s) | 7123<br>(2<br>credit<br>s) | 3503<br>(2<br>credit<br>s) | 1978<br>(3<br>credit<br>s) | 4248<br>(3<br>credit<br>s) | 4249<br>(4<br>credit<br>s) | 497<br>(3<br>credit<br>s) | 111<br>(5<br>credit<br>s) | 4252<br>(2<br>credit<br>s) | 1078<br>1<br>(3<br>credit<br>s) | 2662<br>3<br>(4<br>credit<br>s) | 2662<br>6<br>(3<br>credit<br>s) | 1294<br>(2<br>credit<br>s) | 1299<br>(4<br>credit<br>s) | 2662<br>7<br>(3<br>credit<br>s) | 2662<br>5<br>(3<br>credit<br>s) | 2662<br>4<br>(3<br>credit<br>s) | 2662<br>2<br>(4<br>credit<br>s) | 62<br>(3<br>credit<br>s) | 64<br>(2<br>credit<br>s) | Total<br>Fundin<br>g | RPL<br>incorrec<br>tly<br>claimed |
| 1  |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>270.00                      |
| 4  |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>180.00                      |
| 6  |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>180.00                      |
| 11 |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>270.00                      |
| 13 |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$720                             |
| 21 |                           |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>180.00                      |
| 22 |                           |                 |                            |                                 |                                 |                           |                            |                            |                            |                            |                            |                           |                           |                            |                                 |                                 |                                 |                            |                            |                                 |                                 |                                 |                                 |                          |                          |                      | \$<br>270.00                      |

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|   |   |     |                 |                            | COUR                            | SE CODE                         | Q1 0.12                   | 5 EFTS                     |                            | С                          | OURSE C                    | ODE Q2                     | 0.15 EFT                  | ·s                        |                            | COUR                            | RSE COD                         | E Q3 0.15                       | 5 EFTS                     |                            |                                 | COUR                            | SE CODI                         | Q4 0.15                         | EFTS                     |                          |                      | Total                             |
|---|---|-----|-----------------|----------------------------|---------------------------------|---------------------------------|---------------------------|----------------------------|----------------------------|----------------------------|----------------------------|----------------------------|---------------------------|---------------------------|----------------------------|---------------------------------|---------------------------------|---------------------------------|----------------------------|----------------------------|---------------------------------|---------------------------------|---------------------------------|---------------------------------|--------------------------|--------------------------|----------------------|-----------------------------------|
| # | ŧ | NSN | Student<br>Name | 2780<br>(3<br>credit<br>s) | 2469<br>9<br>(2<br>credit<br>s) | 2470<br>9<br>(3<br>credit<br>s) | 496<br>(3<br>credit<br>s) | 7123<br>(2<br>credit<br>s) | 3503<br>(2<br>credit<br>s) | 1978<br>(3<br>credit<br>s) | 4248<br>(3<br>credit<br>s) | 4249<br>(4<br>credit<br>s) | 497<br>(3<br>credit<br>s) | 111<br>(5<br>credit<br>s) | 4252<br>(2<br>credit<br>s) | 1078<br>1<br>(3<br>credit<br>s) | 2662<br>3<br>(4<br>credit<br>s) | 2662<br>6<br>(3<br>credit<br>s) | 1294<br>(2<br>credit<br>s) | 1299<br>(4<br>credit<br>s) | 2662<br>7<br>(3<br>credit<br>s) | 2662<br>5<br>(3<br>credit<br>s) | 2662<br>4<br>(3<br>credit<br>s) | 2662<br>2<br>(4<br>credit<br>s) | 62<br>(3<br>credit<br>s) | 64<br>(2<br>credit<br>s) | Total<br>Fundin<br>g | RPL<br>incorrec<br>tly<br>claimed |
|   |   |     |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   |                                   |
| 2 | 5 |     |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>270.00                      |
| 2 | 7 |     |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>270.00                      |
| 2 | 8 |     |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$450                             |
| 2 | 9 |     |                 | \$<br>270.0<br>0           | \$<br>180.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0          | \$<br>180.0<br>0           | \$<br>180.0<br>0           | \$<br>270.0<br>0           | \$<br>270.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0          | \$<br>450.0<br>0          | \$<br>180.0<br>0           | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0                | \$<br>180.0<br>0           | \$<br>360.0<br>0           | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>270.0<br>0                | \$<br>360.0<br>0                | \$<br>270.0<br>0         | \$<br>180.0<br>0         | \$<br>6,210.<br>00   | \$<br>180.00                      |

### Appendix 3: List of all student anomalies identified

EFTS highlighted in yellow indicate where funding has been claimed twice, and the student not eligible due to not meeting the age criteria is highlighted in green.

|    |     |                |   |   | EFTS claime                   | d in 2015 SDR            |                            |  | EFTS claime                   | ed in 2016 SDR           |                            | EFTS cla  | imed in 201                   | 7 SDR                    | EFTS cla   |                               |                          |                   |
|----|-----|----------------|---|---|-------------------------------|--------------------------|----------------------------|--|-------------------------------|--------------------------|----------------------------|---|-------------------------------|--------------------------|--|-------------------------------|--------------------------|-------------------|
| #  | NSN | Course<br>Code | Students actual start date (as per enrolment records) | Start date<br>and end date<br>reported in<br>2015 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2016 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end date<br>reported in<br>2017 SDR | Did not<br>complete<br>course | Successful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2018 SDR | Did not<br>complete<br>course | Successful<br>Completion | EFTS over claimed |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |
| 1  |     | Q2             | 14/04/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |
| -  |     | Q3             | 14,04,2013  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.3730            |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |
| 2  |     | Q2             | 21/09/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |
|    |     | Q3             | ,,  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          |                   |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             | -   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |
| 3  |     | Q2             | 28/07/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.2750            |
|    |     | Q3             |   | 11/12/2015  | 0.1500                        |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          |                   |
|    |     | Q4             |   |   | 0.1500                        |                          |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             | _   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |                   |
| 4  |     | Q2             | 15/02/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750            |
|    |     | Q3             |   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 0.0700            |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |                   |
|    |     | Q1             |   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |                   |
| 5  |     | Q2             | 15/02/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 1.1500            |
|    |     | Q3             | 13,02,2010  | Applicable  | icable                        |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 1.1300            |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |                   |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |
| 6  |     | Q2             | 19/05/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |
|    |     | Q3             |   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.0700            |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             | _   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |
| 7  |     | Q2             | 09/08/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.4250            |
|    |     | Q3             | 03, 03, 202   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               |                          | 0.1500                     | Applicable  |                               |                          | Applicable   |                               |                          |                   |
|    |     | Q4             |   |   | 0.1500                        |                          |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             | <br> -  |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            | <br><del> </del>                                      |                               |                          |  |                               |                          |                   |
| 8  |     | Q2             | 07/09/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |
|    |     | Q3             |   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          |                   |
|    | _   | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |
|    |     | Q1             | <br> -  |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |                   |
| 9  |     | Q2             | 28/11/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750            |
|    |     | Q3             | -   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          |                   |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |                   |
|    |     | Q1             | _   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |                   |
| 10 |     | Q2             | 27/10/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750            |
|    |     | Q3             | -   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          |                   |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |                   |
| 1  |     | Q1             | 06/06/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1250                   |                            | 16/01/2017  |                               | 0.1250                   | Not  |                               |                          | 0.5350            |
| 11 |     | Q2             | 06/06/2016  | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 0.5750            |
|    |     | Q3             | <u>l</u>  |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  | j                             |                          |                   |

|    |     |                |   |   | d in 2015 SDR                 |                          |                            | EFTS claime  | ed in 2016 SDR                |                          | EFTS cla                   | nimed in 201  | 7 SDR                         | EFTS cla                 |  |                               |                          |  |
|----|-----|----------------|---|---|-------------------------------|--------------------------|----------------------------|--|-------------------------------|--------------------------|----------------------------|---|-------------------------------|--------------------------|--|-------------------------------|--------------------------|--|
| #  | NSN | Course<br>Code | Students actual start date (as per enrolment records) | Start date<br>and end date<br>reported in<br>2015 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2016 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end date<br>reported in<br>2017 SDR | Did not<br>complete<br>course | Successful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2018 SDR | Did not<br>complete<br>course | Successful<br>Completion | EFTS over claimed                                |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |  |
|    |     | Q1             |   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |  |
| 12 |     | Q2             | 10/08/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750   |
|    |     | Q3             |   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | ]  |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          | 1  |
| 13 |     | Q2             | 18/05/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750   |
|    |     | Q3             | 1   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          |  |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |  |
|    |     | Q1             | _   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          | ]  |
| 14 |     | Q2             | 28/06/2016  | Not   |                               |                          |                            | 18/01/2016<br>16/12/2016                                 |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750   |
|    |     | Q3             | _   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | -  |
|    |     | Q4             |   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          | <del>                                     </del> |
|    |     | Q1             |   |   |                               |                          |                            |  |                               |                          |                            | 46/04/2047  |                               | 0.1250                   | 22/04/2040   |                               | 0.1250                   | <u> </u>   |
| 15 |     | Q2             | 17/07/2017  | Not<br>Applicable                                     |                               |                          |                            | Not<br>Applicable  |                               |                          |                            | 16/01/2017<br>22/12/2017                              | 0.4500                        | 0.1500                   | 22/01/2018<br>21/12/2018                                 |                               | 0.1500                   | 0.2750   |
|    |     | Q3             | -   | Applicable  |                               |                          |                            | Applicable   |                               |                          |                            | 22/12/2017  | 0.1500                        |                          | 21/12/2016   |                               | 0.1500                   | 4  |
|    |     | Q4             |   |   |                               |                          |                            |  |                               |                          |                            |   | 0.1500                        |                          |  |                               | 0.1500                   | <del>                                     </del> |
|    |     | Q1             | _   | Net   |                               |                          |                            | Net  |                               |                          |                            | 16/01/2017  |                               | 0.1250                   | 22/04/2010   |                               | 0.1250                   | <u> </u>   |
| 16 |     | Q2             | 17/07/2017  | Not<br>Applicable                                     |                               |                          |                            | Not Applicable   |                               |                          |                            | 16/01/2017<br>22/12/2017                              | 0.1500                        | 0.1500                   | 22/01/2018<br>21/12/2018                                 |                               | 0.1500                   | 0.2750   |
|    |     | Q3             | 1   | Аррпсавіс   |                               |                          |                            |  |                               |                          |                            |   | 0.1500                        |                          | 21/12/2010   | 0.1500                        | 0.1500                   | 1  |
|    |     | Q4<br>Q1       |   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   | 0.1500                        | 0.1250                   |  | 0.1500                        |                          | <del>                                     </del> |
|    |     | Q1<br>Q2       | -   | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1230                   |                            | 16/01/2017<br>22/12/2017                              |                               | 0.1500                   | Not  |                               |                          | 1  |
| 17 |     | Q3             | 15/09/2016  | Applicable  |                               |                          |                            | 18/01/2016<br>16/12/2016                                 |                               | 0.1500                   |                            |   |                               | 0.1500                   | Applicable   |                               |                          | 0.5750   |
|    |     | Q4             | 1   | 7.1010  |                               |                          |                            |  |                               | 0.1500                   |                            | ,,  |                               | 0.1500                   |  |                               |                          | 1  |
|    |     | 01             |   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |  |
|    |     | Q2             | 1   | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 1  |
| 18 |     | Q3             | 26/09/2016  | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 0.5750   |
|    |     | Q4             | 1   |   |                               |                          |                            |  |                               | 0.1500                   |                            | 1   |                               | 0.1500                   |  |                               |                          | 1  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  | 0.1250                        |                          |                            |   |                               |                          |  |                               |                          |  |
| 10 |     | Q2             | 0.4/07/0045   | 12/01/2015  | 0.1500                        | 0.1200                   |                            | Not  | 0.1500                        |                          |                            | Not   |                               |                          | Not  |                               |                          | 1 0 1050   |
| 19 |     | Q3             | 24/07/2015  | 11/12/2015  | 0.1500                        |                          |                            | Applicable   | 0.1500                        |                          |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.1250   |
|    |     | Q4             | 1   |   | 0.1500                        |                          |                            |  | 0.1500                        |                          |                            |   |                               |                          |  |                               |                          |  |
|    |     | Q1             |   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          |  |
| 20 |     | Q2             | 20/10/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750   |
| 20 |     | Q3             | 28/10/2016  | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 0.5750   |
|    |     | Q4             | 1   |   |                               |                          |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |  |
| 21 |     | Q2             | 19/05/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750   |
| -1 |     | Q3             | 13,03,2013  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.5750   |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |  |
|    |     | Q1             | _   |   |                               |                          |                            |  |                               | 0.1250                   |                            |   |                               | 0.1250                   |  |                               |                          | ]  |
| 22 |     | Q2             | 04/05/2016  | Not   |                               |                          |                            | 18/01/2016   |                               | 0.1500                   |                            | 16/01/2017  |                               | 0.1500                   | Not  |                               |                          | 0.5750   |
|    |     | Q3             | •   | Applicable  |                               |                          |                            | 16/12/2016   |                               | 0.1500                   |                            | 22/12/2017  |                               | 0.1500                   | Applicable   |                               |                          | 4  |
|    |     | Q4             |   |   |                               | 0.105-                   |                            |  |                               | 0.1500                   |                            |   |                               | 0.1500                   |  |                               |                          |  |
| 22 |     | Q1             | 00/07/2015  | 12/01/2015  |                               | 0.1250                   |                            | 18/01/2016   |                               | 0.1250                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750   |
| 23 |     | Q2             | 08/07/2015  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.5750   |
|    |     | Q3             | Ĺ   |   |                               | 0.1500                   | <u> </u>                   |  |                               | 0.1500                   |                            |   | <u> </u>                      |                          |  |                               |                          |  |

|    |     |                |   |   | EFTS claime                   | d in 2015 SDR            |                            |  | EFTS claime                   | ed in 2016 SDR           |                            | EFTS cla  | imed in 201                   | 7 SDR                    | EFTS claimed in 2018 SDR                                 |                               |                          |                   |  |
|----|-----|----------------|---|---|-------------------------------|--------------------------|----------------------------|--|-------------------------------|--------------------------|----------------------------|---|-------------------------------|--------------------------|--|-------------------------------|--------------------------|-------------------|--|
| #  | NSN | Course<br>Code | Students actual start date (as per enrolment records) | Start date<br>and end date<br>reported in<br>2015 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2016 SDR | Did not<br>complete<br>course | Successful<br>Completion | Unsuccessful<br>Completion | Start date<br>and end date<br>reported in<br>2017 SDR | Did not<br>complete<br>course | Successful<br>Completion | Start date<br>and end<br>date<br>reported in<br>2018 SDR | Did not<br>complete<br>course | Successful<br>Completion | EFTS over claimed |  |
|    |     | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          |                   |  |
| 24 |     | Q2             | 09/09/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |  |
| -  |     | Q3             | 03,03,2013  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.5750            |  |
|    | _   | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          | <br> -            |  |
| 25 |     | Q2             | 15/06/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |  |
|    |     | Q3             | -,,   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | -                 |  |
|    | -   | Q4             |   |   |                               | 0.1500                   |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q1             |   |   |                               | 0.1250                   |                            |  |                               | 0.1250                   |                            |   |                               |                          |  |                               |                          | -                 |  |
| 26 |     | Q2             | 31/03/2015  | 12/01/2015  |                               | 0.1500                   |                            | 18/01/2016   |                               | 0.1500                   |                            | Not   |                               |                          | Not  |                               |                          | 0.5750            |  |
|    |     | Q3             |   | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | -                 |  |
|    | -   | Q4             |   |   |                               | 0.1500<br>0.1250         |                            |  |                               | 0.1500                   |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q1             |   | 12/01/2015  |                               |                          |                            | 18/01/2016   |                               | 0.1250<br>0.1500         |                            | Not   |                               |                          | Net  |                               |                          | -                 |  |
| 27 |     | Q2<br>Q3       | 31/03/2015  | 12/01/2015  | 0.1500                        | 0.1500                   |                            | 16/12/2016   |                               | 0.1500                   |                            | Applicable  |                               |                          | Not<br>Applicable  |                               |                          | 0.2750            |  |
|    |     | Q4             |   | 11/12/2013  | 0.1500                        |                          |                            | 10/12/2010   |                               | 0.1500                   |                            | Арріісавіе  |                               |                          | Арріісавіе   |                               |                          | 1                 |  |
|    | -   |                |   |   | 0.1300                        | 0.4350                   |                            |  |                               |                          |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q1             |   | 12/01/2015  | 0.1500                        | 0.1250                   |                            | 18/01/2016   | 0.1500                        | 0.1250                   |                            | Not   |                               |                          | Not  |                               |                          | -                 |  |
| 28 |     | Q2<br>Q3       | 31/08/2015  | 11/12/2015  | 0.1500                        |                          |                            | 16/12/2016   | 0.1500<br>0.1500              |                          |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.1250            |  |
|    |     | Q3<br>Q4       |   | 11/12/2013  | 0.1500                        |                          |                            | 10/12/2010   | 0.1500                        |                          |                            | Дрисавіс  |                               |                          | Аррпсавіс  |                               |                          | -                 |  |
|    |     | Q4<br>Q1       |   |   | 0.1300                        | 0.1250                   |                            |  | 0.1300                        | 0.0626                   |                            |   |                               |                          |  |                               |                          |                   |  |
|    |     | Q2             |   | 12/01/2015  |                               | 0.1230                   |                            | 18/01/2016   |                               | 0.0626                   |                            | Not   |                               |                          | Not  |                               |                          | -                 |  |
| 29 |     | Q3             | 04/07/2015  | 11/12/2015  |                               | 0.1500                   |                            | 16/12/2016   |                               | 0.0756                   |                            | Applicable  |                               |                          | Applicable   |                               |                          | 0.2894            |  |
|    |     | Q4             |   | 11/12/2013  |                               | 0.1500                   |                            | 10/12/2010   |                               | 0.0756                   |                            | Арріісавіс  |                               |                          | Аррпсавле  |                               |                          | -                 |  |

TOTAL EFTS 14.7144