



TEC Investigation Report - Face and Beauty Academy Limited (8603)

Executive Summary

1. In September 2019, the Tertiary Education Commission - Te Amorangi Mātauranga Matua (TEC) received confidential complaints regarding Face and Beauty Academy Limited (Face and Beauty)'s delivery of its New Zealand Certificate in Barber Skills (Level 3) (The Certificate).
2. TEC investigators met with three of the complainants to discuss their concerns prior to the course completion in December 2019. After this meeting formal complaints were submitted to Face and Beauty in 2020 and a formal investigation was initiated.
3. Interviews were conducted with both learners and past and previous staff from Face and Beauty. The responses highlighted that students enrolled in the Certificate did not have a full time permanent tutor from 2 July 2019 until 14 October 2019. There were also issues around the self-directed learning (SDL) component of the course, in that it was not robustly monitored and evidenced.
4. Face and Beauty assisted with the investigation by providing documentary evidence and responses to queries. While Face and Beauty showed in its submission to the TEC that SDL was mapped and planned out, the TEC could not find any evidence that these hours had occurred, which was corroborated by student interviews. Consequently, a funding recovery of \$6,830.71 for SDL hours was necessary.
5. In its response, Face and Beauty told the TEC that since the PTE merged with NZST, full SDL checks are now in place and part of NZST's project plans, meaning all its PTE are under the same scrutiny for SDL monitoring. While we note that this qualification is no longer offered, we expect that compliance of overall learning hours and a follow up audit will be scheduled to ensure that there are sufficient practices in place.

Background

6. Face and Beauty is a TEC funded registered private training establishment (PTE) located in Tauranga. It was bought by and merged with the New Zealand School of Tourism (NZST) in July 2019, which brought new management to the PTE.
7. Face and Beauty offers courses in Hairdressing, Beauty Therapy and Makeup Artistry. The New Zealand Certificate in Barber Skills (Level 3) (The Certificate) was last offered in 2019, and it aimed for its graduates to gain fundamental skills and knowledge to begin working as an entry level Barber. This qualification was delivered over 43 weeks (excluding holiday weeks) and 1204 total learning hours, comprised by 4 days of directed learning hours per week onsite with tutor guidance, and 2 hours of self-directed learning hours per week.

8. The table below provides a breakdown of TEC funding received between 2018 and 2019:

Fund	2018 Actual GST exclusive	2019 \$ GST exclusive	Actual
Investment Plan			
Student Achievement Component Level 3 and above (SAC3+)	\$722,751.00	\$734,315.00	
Equity Funding	\$683.00	\$439.00	
Fees-free	\$315,882.00	\$263,000.00	
Total	\$1,039,316.00	\$99,7754.00	

Investigation Scope

9. The scope of the investigation looked at the organisation's compliance with TEC's funding conditions for 2019 following the issues raised in the complaints, specifically:
- Evidence to show whether total approved and funded hours for the Certificate were fully delivered for the duration of the programme, particularly self-directed learning hours (SDLH),
 - Enrolment and attendance records, and assessment results,
 - Evidence to assess the validity of the received complaints stating that students did not have a full time tutor between July and October 2019,
 - Together with NZQA, evidence to assess whether students' learning outcomes were or were not achieved, as a result of the alleged lack of support and resources provided to students.
10. The TEC did not visit the premises of Face and Beauty in Tauranga, due to the Covid-19 restrictions in 2020. Evidence relating to students enrolments and course delivery was provided to the TEC by Face and Beauty staff.

Investigation Findings

Self-Directed Learning

11. The Certificate is a NZQA approved programme made up of 120 credits. It has a total of 1204 total learning hours, of which 86 are SDL hours scheduled to occur for 2 hours per week on Fridays. These hours are aligned with what has been approved and funded by the TEC, and is entered in the *Services for Tertiary Education Organisations* system (STEO).¹
12. When assigning EFTS values to qualifications, TEOs must adhere to condition 6.7². Included in this condition is a requirement to breakdown the notional learning hours in the STEO website. The notional learning hours comprise of learning activities which must be planned and communicated to the student. Included in these activities are "self-directed learning activities that the student is expected to engage with/participate in".
13. An analysis of Face and Beauty's Single Data Returns (SDR) identified that over the 2018-2019 years, nine students were reported as being enrolled in the Certificate³. The TEC interviewed seven students enrolled in the Certificate, and responses were consistent in that students were never advised what to do on Fridays. No

¹ This forms the basis for the TEC's funding of the programmes and any variance between STEO/programme approvals and what is being delivered will have potential funding consequences.

² Student Achievement Component – Provision at Level 3 and above. Full conditions can be found [here](#)

³ One student withdrew from the course and stopped attending early on.

expectations were outlined and there were no checks in place to assess whether students had done study specified for SDL hours.

14. Responses received during the course of the investigation included students describing the two hours of SDL as:
 - Nothing was organised for the Friday and it was considered a free day (Classes were only taught Monday to Thursday and the only work done was during class hours those days).
 - One student proactively used time to engage with local industry for learning opportunities, as there were no planned activities given to students by Face and Beauty.
15. As discussed in paragraph 19 below, Face and Beauty showed in its submission to the TEC that SDL was outlined in the scheme of work and linked to unit standards. However, based on the interview responses, the TEC could not find any evidence that these had occurred, which was corroborated by student interviews.
16. It is the TEC's expectation that all approved and funded learning hours are delivered and are able to be evidenced by TEOs.

Tutor vacancy and student interview responses

17. Face and Beauty's barbering tutor commenced in February 2019 and subsequently resigned, departing from Face and Beauty on 2 July 2019. Evidence provided from Face and Beauty and student and staff interview responses indicate that, after the tutor's resignation, there was no permanent replacement tutor appointed until 14 October 2019.
18. The investigation did note as per Face and Beauty's response to the TEC that provisions had been made for the learners to be incorporated into hair dressing classes led by Face and Beauty's hairdressing lead trainer, barbering relief tutors were provided for certain short periods, and out of district learning opportunities were offered.

Face and Beauty Response

19. Face and Beauty provided a written response and supporting evidence. In its response, Face and Beauty acknowledged that the barbering tutor had left, but that training was provided to the barbering students and covered through hairdressing tutors, relief tutors were used to deliver parts of the barbering course, some learners were sent out of district for learning opportunities, and a new barbering tutor was appointed full time starting on 14 October 2019.
20. It also told TEC that the two hours per week of SDL referred to the particular unit standard that students are studying on different weeks. Face and Beauty staff provided an example for a particular unit standard (U.S 25435 – showed in the image below) where students had to do research and write about the specific topic of the particular unit standard. One staff member also told TEC that hairdressing tutors were available on Fridays to help with questions or doubts.

WEEK 29 13 - 17 August 2018	Week 29 Monday	SUBJECT / ACTIVITY	Unit	Assessment	Live Model Mannequin	Re-Sits	Literacy & Numeracy
2 hour SDL session hours of learners own time	SDL Day	Unit Standard 25435 - Create appointments & maintain appointments systems & records in salon environment (Assignment)- Learner to apply 2 hours research and writing toward this assignment					
	Monday		Unit	Assessment		Re-Sits	
9am – 10.30am	Session 1	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
10.45am – 12.15pm	Session 2	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
12.45pm – 2.15pm	Session 3	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
2.30pm - 4.00pm	Session 4	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
	Tuesday						
9am – 10.30 am	Session 1	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
10.45am – 12.15pm	Session 2	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
12.45pm – 2.15pm	Session 3	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
2.30pm - 4.00pm	Session 4	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
	Wednesday		Unit	Assessment		Re-Sits	
9am – 10.30am	Session 1	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
10.45am – 12.15pm	Session 2	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
12.45pm – 2.15pm	Session 3	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
2.30pm - 4.00pm	Session 4	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
	Thursday						
9am – 10.30am	Session 1	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
10.45am – 12.15pm	Session 2	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y
12.45pm – 2.15pm	Session 3	Training salon, students practice skills on clients and can	(Mixture)	1.5	Live model	Yes	Y
2.30pm - 4.00pm	Session 4	collect evidence and sit assessments, for practical units delivered.	(Mixture)	1.5	Live model	Yes	Y

21. Face and Beauty's new Senior General Manager also stated that, as the PTE was merged with NZST, there was a gap in SDL monitoring processes and that full SDL checks are now in place and part of NZST's project plans, meaning all its PTEs are under the same scrutiny for SDL monitoring.

Funding recovery and recommendations

22. While Face and Beauty were able to outline that SDL hours were mapped to unit standards, there was no expectation or direction provided to the students. In the interviews, the students stated that there was no expectation to do any work on the Friday and there was no requirement to do things such as the written assignment discussed above.

23. Based on this analysis, the TEC was unable to find any evidence that the SDL hours occurred and were evidenced, therefore resulting in a shortfall of 86 hours (the SDL hour component). This shortfall attracted a funding recovery for non-delivery of self-directed learning hours⁴ of \$6,830.71.

24. While we note that this qualification is no longer offered, we expect that compliance of SDL, and overall learning hours, will be part of Face & Beauty's processes included in any future or similar offerings of this qualification. A follow up audit will be scheduled to ensure that there are sufficient practices in place.

Conclusion

34. The investigation of the Certificate offered in 2019 found that Face and Beauty failed to deliver the expected learning hours for the programme, particularly its SDL component. Face and Beauty did not provide students with sufficient guidance, and did not monitor whether SDL hour requirements were being met. Consequently, the TEC determined that there was shortfall in SDL hours and a funding recovery for this component was necessary.

35. Face and Beauty has addressed these issues, which will be confirmed with a follow-up audit in the next year.

⁴ TEC SAC Level 3+ funding conditions 7.1 (a) and 16 (a).