



Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) audit report

- Education Services for Overseas Students Act 2000 (ESOS)
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (National Code)

Legal name of provider/applicant	Pramukh Group of Companies Pty Ltd
Date/s of audit	13 and 14 August 2013
Review of rectification evidence	2 November 2013

APPLICANT DETAILS			
Provider legal name	Pramukh Group of Companies Pty Ltd		
Registered business trading name	Harward International College	ABN	72 135 865 066
CRICOS ID number/s (if applicable)	03234B	CRICOS Expiry date (if applicable)	30/9/2015
Address	Level 9, 14 Queens Rd, Melbourne Vic		Postcode 3004
Phone	03 9866 7756	Fax	
E-mail	mrugeshpatel@pramukh.com.au	Website	http://www.harward.vic.edu.au/
Registration contact	Name Mr Mrugeshkumar Patel	Position	Director

REGISTERED TRAINING ORGANISATION DETAILS (if applicable)			
RTO Number	22332	RTO Expiry date	31 July 2015

AUDIT TEAM	
Lead auditor	Robert east
Audit team members	N/A

ASQA CONTACT DETAILS			
Phone	1300 701 801	E-mail	compliancemelb@asqa.gov.au

AUDIT DETAILS	
Audit type	<input type="checkbox"/> Initial registration <input type="checkbox"/> Renewal of registration <input checked="" type="checkbox"/> Extension to scope of registration (EOS) <input type="checkbox"/> New delivery site/s (NDS) <input type="checkbox"/> Increase to existing student capacity (IC) <input checked="" type="checkbox"/> Compliance monitoring <input type="checkbox"/> Work based training (WBT) <input type="checkbox"/> Other
Date/s of site visit/s	14 & 15 August 2013
Site/s visited	Level 9, 14 Queens Rd, Melbourne Vic 3004
Audit scope	ESOS Legislative Framework – part C: 7 -10 and Part D: Standards 1, 2.1 a-e, 6.2, 9.4, 10 & 14.
Integrated audit	Integrated Audit with the VET Quality Framework (Applications 1029481, 1035147, 1038562)

ORGANISATION	
Maximum Number of Students	
Current maximum capacity:	215
Actual number of students:	91
Requested increased capacity:	Nil
Audited recommended capacity:	No Change

The Pramukh Group of Companies Pty Ltd trading as Harward International College has been operating for approximately three years since its original registration in July 2010. The current CEO has been with the company since start up. The RTO is privately owned and has been registered as a CRICOS provider since November 2010.

The RTO is managed by the CEO Mrugesh Patel with assistance from:

- Muhammad Asim Khan – RTO Manager
- Internal Compliance group
- External compliance group

- Finance Manager
- Academic / Industry Board

The RTO utilises two external consultants, James Nash and Jim Richardson in its external compliance group and four industry representatives on its Academic / Industry Board to assist them with developing and validating training and assessment.

The RTO/organisation delivers classroom based training only from its Queens Rd premises in Melbourne.

The RTO's scope of registration includes:

- BSB40207 Certificate IV in Business
- BSB51107 Diploma of Management

and is currently seeking to add the the following

- BSB41307 Certificate IV in Marketing
- BSB51207 Diploma of Marketing
- BSB60507 Advanced Diploma of Marketing
- BSB60407 Advanced Diploma of Management

to its VET and CRICOS scope of registration.

The RTO's current enrolments include:

- BSB40207 Certificate IV in Business - 54
- BSB51107 Diploma of Management- 37

The RTO/organisation offers its training and services as a fee for service provider.

Total number of current enrolments in RTO as at audit date: 91

FOCUS OF AUDIT

Code	Qualification, course and/or program	Site/Venue	Student Capacity
BSB51107	Diploma of Management	Lvl 9, 14 Queen Street Melb	215
BSB60407	Advanced Diploma of Management	Lvl 9, 14 Queen Street Melb	
BSB51207	Diploma of Marketing	Lvl 9, 14 Queen Street Melb	

INTERVIEWEES

Staff (name and position)

Name	Position	Program (qualification, course etc)
Mrugesh Patel	CEO	All Courses
Muhammad Asim Khan	RTO Manager	All Courses
Jay Praful Kumar Patel	IT Support	All Courses

SUMMARY OF AUDIT OUTCOME

This audit was conducted under the *Education Services for Overseas Students Act 2000* (the Act) to assess compliance with requirements of the *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007* as identified under the Scope of Audit section above.

AUDIT OUTCOME

Audit status as at 14 August 2013

- The organisation **has NOT demonstrated compliance** with all compliance requirements reviewed for the audit.

The audit report describes the evidence of non-compliance identified. Each issue referenced must be rectified by the organisation with evidence provided to ASQA within **20 working days** of the date of the letter accompanying this audit report to demonstrate corrective actions implemented.

Auditor's Name	Robert East	Signature	<i>R W East</i>	Date of Report	9 September 2013
-----------------------	-------------	------------------	-----------------	-----------------------	------------------

Audit status as at 3 November 2013

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

Auditor's Name	Robert East	Signature	<i>R W East</i>	Date of Report	2 November 2013
-----------------------	-------------	------------------	-----------------	-----------------------	-----------------

AUDIT SUMMARY OF ESOS ACT REQUIREMENTS

ESOS ACT COMPONENT		STATUS*
Education Services for Overseas Students Act 2000 - Sections		
9B	Fit and proper person	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
21	Record keeping	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
21A	Obligations relating to the agents of registered providers	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 – Registration on CRICOS		
7	Course duration	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
8	Work-based training	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
9	Mode and place of study	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
10	Arrangements with other providers	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 - Standards for Registered Providers		
1	Marketing information and practices	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
2	Student engagement before enrolment	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> NA
3	Formalisation of enrolment	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
4	Education agents	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
5	Younger students	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
6	Student support services	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
7	Transfer between registered providers	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
8	Complaints and appeals	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
9	Completion within the expected duration of study	<input checked="" type="checkbox"/> C <input type="checkbox"/> NC <input type="checkbox"/> NA
10	Monitoring course progress	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> NA
11	Monitoring attendance	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
12	Course credit	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
13	Deferring, suspending or cancelling the student's enrolment	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
14	Staff capability, educational resources and premises	<input type="checkbox"/> C <input checked="" type="checkbox"/> NC <input type="checkbox"/> NA
15	Changes to registered providers' ownership or management	<input type="checkbox"/> C <input type="checkbox"/> NC <input checked="" type="checkbox"/> NA
*STATUS: Status of audit findings when audit was conducted C = Compliant NC = Not Compliant NA = Not audited		

Audit Findings

STANDARD 2.2: STUDENT ENGAGEMENT BEFORE ENROLMENT

The provider did not establish the individual needs of the client, as it was not establishing what previous qualifications the student had already obtained and providing suitable guidance on the benefits to the student of enrolling in the desired course. One student sampled (Davinder Singh) was found to already hold the BSB40207 Certificate IV in Business and yet he was enrolled in the same course by the provider. A number of other students sampled, held qualifications at the same AQF level or in the same business area and yet were enrolled without any investigation into the benefit to the student in enrolling in the new course or the application of credit transfer or RPL.

STANDARD 10.3 COURSE PROGRESS

Gurwinderjeet Kaur had been enrolled in the Diploma of Management since 18 March 2013 and had not yet been deemed competent in any of the following units assessed:

- BSBMGT516C Facilitate continuous improvement
- BSBOHS509A Ensure a safe workplace
- BSBWOR502B Ensure team effectiveness
- BSBCUS501C Manage quality customer service
- BSBFIM501A Manage budgets and financial plans
- BSBMGT502B Manage people performance
- BSBADM502B Manage meetings
- BSBWOR501B Manage personal work priorities and professional development

As almost 2 study periods has transpired since commencement of the course and the provider did not offer any explanation for this lack of progress, it is clearly not implementing its course progress policy or its implementation strategy.

STANDARD 14.2 EDUCATIONAL RESOURCES

The library facilities required by the IBSA resources purchased for use by students studying the:

- BSB60407 Advanced Diploma of Management and
- BSB51207 Diploma of Marketing

were not available.

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

STANDARD 2.2: STUDENT ENGAGEMENT BEFORE ENROLMENT

The organisation is required provide:

- its current approach to establishing the needs of new students and why it allows prospective students to enrol in courses already obtained or courses which would have little vocational benefit to the student;
- why credit transfer or RPL is not being explained and offered to students when enrolling in qualifications in which they already hold similar qualifications;
- its policy on how it implements RPL and credit transfer and show examples of where it has been implemented;
- a robust strategy to identify student study requirements and provide suitable guidance on the most appropriate course to meet the student's needs.

Rectification Evidence provided 10 October 2013

The RTO provided an explanation of enrolment process for Davinder Singh as well a signed statement from Davinder stating that he had not provided the accurate details describing his previous training. The provider has also demonstrated that it has now implemented a robust system to ensure that all enrolling students are aware of the need:

- to accurately declare their previous training history;
- to offer RPL and Credit transfer and
- to clearly explain the courses they have on offer and their vocational advantages

Final Outcome

The provider now meets the requirements of this standard.

STANDARD 10.3 COURSE PROGRESS

The provider is required to:

- produce the final results for the student Gurwinderjeet Kaur recorded in its student management system;
- provide copies of the correspondence sent to the Gurwinderjeet Kaur regarding her course progress;
- provide evidence that the provider had implemented its intervention strategy for Gurwinderjeet Kaur and
- verification that all other students failing to meet the provider's course progress policy have been communicated with as described in its policy.

Rectification Evidence provided 10 October 2013

The provider had presented a history of the communications between the college and the student Gurwinderjeet Kaur which includes:

- implementation of its early intervention strategy;
- multiple attempts at communication with the student;
- evidence of the reasons for the student's poor performance;
 - death of a father and
 - divorce
- awarding the student a 3 month extension to her studies for compelling reasons

Final Outcome

The provider now meets the requirements of this standard.

STANDARD 14.2 EDUCATIONAL RESOURCES

The provider is to make available to students a complete set of resources which will enable the delivery of the:

- BSB60407 Advanced Diploma of Management and
- BSB51207 Diploma of Marketing

so that they will meet the requirements of the Training Package.

Rectification Evidence provided 10 October 2013

The provider has produced the following additional evidence:

- appropriate resources from Precision Group and Small Print
- Added the book Marketing in Black And White to the student's book list
- Added the \$200 materials fee to the enrolment form
- Purchased a number of text books and made them available to students through a library borrowing system.

Final Outcome

The provider now meets the requirements of this standard.