

QUALIFY FOR THE FUTURE WORLD KIA NOHO TAKATŪ KI TŌ ĀMUA AO!

# Report of External Evaluation and Review

**Gisborne Development Incorporated** 

Not Yet Confident in educational performance Not Yet Confident in capability in self-assessment

Date of report: 25 August 2016

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MoE Number:9660NZQA Reference:C22236Date of EER visit:28 and 29 April 2016

## Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.

## Introduction

### 1. TEO in context

Name of TEO:	Gisborne Development Incorporated (GDI) www.gisbornedevelopment.co.nz		
Туре:	Private training establishment (PTE)		
First registered:	29 July 1991		
Location:	161 Carnarvon Street, Gisborne		
Delivery sites:	As above		
Courses currently	Pathway To Carpentry Industry (level 3)		
delivered:	Pathway to Construction Industry (level 2)		
	Pathway to Joinery Industry (level 2)		
	Pathway to Motor Industry - Mechanics (level 2)		
	• Pathway to Painting and Decorating Industry (level 3)		
	• Pathways to Mechanical Engineering (levels 1-2)		
Code of Practice signatory:	No		
Number of students:	Domestic: 49 students (63 equivalent full-time students) in 2015		
	78 per cent Māori and 97 per cent under 20 years of age		
Number of staff:	Eight full-time equivalent staff		
Scope of active	Manufacturing Skills (to level 4)		
accreditation:	Mechanical Engineering (to level 4)		
	Carpentry (to level 4)		

- Joinery (to level 4)
- Automotive (to level 3)
- Cabinetry (to level 3)

For further details: <u>http://www.nzqa.govt.nz/providers/nqf-</u> accreditations.do?providerId=966011001

Distinctive characteristics: GDI is a provider with a long-term commitment to support youth into industry-based apprenticeships, further training and employment. The PTE's programmes aim to develop foundation-level generic and trades knowledge, skills and attitudes in Youth Guarantee-funded trainees. The programme delivery consists of knowledge learnt in a classroom and practical skills learnt and applied in purpose-built trade workshops. The trainees are then placed for one day a week with an employer, applying their learning in a workplace. The provider has a small amount of The Secondary Tertiary Alignment Resource (STARs) funding to enable local school students to experience trades training.

Recent significant changes: Youth Guarantee funding was increased with the termination of the Foundation-Focused Training Opportunities (FFTO) funding pool at the end of 2014. Therefore, nearly all trainees are now under the age of 20 years. Approval was received from NZQA for 6 trade programmes between February 2013 and February 2014. The long-term chief executive formally resigned in March 2016, and the office manager was appointed to the new role of centre manager. Three new teaching staff replaced established staff in 2015.

Previous quality assurance history: The first external evaluation and review (EER) of GDI took place in May 2012; NZQA was Highly Confident in the educational performance and Confident in the capability in self-assessment of the PTE. The rating for the focus area of governance, management, and strategy was Good in educational performance and Adequate in selfassessment. For the other focus area of Youth Guarantee and Training Opportunities programme provision the ratings were Excellent and Good.

A Tertiary Education Commission (TEC) audit (January 2015) found the PTE compliant, except for:

 several just-expired unit standards that needed to be updated for assessment in 2015 • the progress of students not being monitored against the literacy and numeracy assessment tool.

The external moderation results of GDI were as follows:

- The Motor Industry Training Organisation (MITO) report concluded that the marked samples for one unit standard met the national standard. MITO was satisfied with GDI's assessment activities after a site visit (October 2014). However, concern was expressed about internal moderation processes. MITO 'highly recommended' that GDI implement internal moderation procedures of pre-and post-assessment activities.
- The Building and Construction Industry Training Organisation report (11 May 2015) concluded that the marked samples for four out of five unit standards met the national standard. One unit standard that was moderated was not the latest version of the unit. The moderation included a campus visit; some positive comments were made about the programme delivery.
- The Competenz report (30 October 2015) concluded that the assessment materials for one unit standard met the national standard.
- The NZQA Moderation report (December 2015) concluded that the marked samples for two unit standards met the national standard.

### 2. Scope of external evaluation and review

The lead evaluator reviewed documents submitted by GDI, including various external moderation reports, as well as NZQA and TEC-held data. A scoping meeting was held via video chat with the centre manager. The two key focus areas selected and the rationale for them being chosen were:

- Governance, management and strategy, as this is a mandatory focus area.
- All of the trades training programmes. This focus was chosen as GDI is a small provider offering similarly structured foundation-level training to trainees who come from similar backgrounds.

### 3. Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published policies and procedures. The methodology used is described fully in the web document Policy and Guidelines for the Conduct of External Evaluation and Review available at: http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

The NZQA team of two evaluators visited the GDI delivery site over one and half days, including a tour of the different workshops and classrooms. The team met with:

- The director of the trust, the centre manager, the five trades tutors, the office administrator, and the modern apprenticeship coordinator/previous chief executive
- Eleven randomly selected trainees from each of the training programmes; five employers and three graduates/now apprentices selected by the PTE; a representative of a youth transition service.

Phone interviews were conducted with a representative of another youth transition service and two representatives from different industry training organisations.

The evaluators reviewed NZQA and TEC documentation, various external moderation reports, a self-assessment summary, the PTE's TEC investment plan 2015-2016, the quality manual 2016, numerous internal moderation documents, student achievement data and other related documentation provided. The provider's website was also viewed.

## Summary of Results

### Statement of confidence on educational performance

NZQA is **Not Yet Confident** in the educational performance of **Gisborne Development Incorporated (GDI).** 

GDI is meeting the most important needs of some of its students, local employers and industry stakeholders. The key points supporting this judgement are:

- There is evidence that some GDI students are developing foundation-level trade and workplace skills. Over the past three years, between 12 and 19 per cent of students completed a qualification. This is considerably lower than most other Youth Guarantee providers. Students are achieving numerous and relevant unit standards and some are performing in the workshop or in their work placement.
- There is variable evidence that a significant proportion of students are going on to further training or employment. Over the past four years, between 13 and 16 per cent of students have clearly gained a paid apprenticeship. There is basic evidence, over that same period, that around 30 per cent have re-enrolled with GDI or gone on to further training elsewhere. There are indications that 33-40 per cent of students over this period have gained some form of paid work. The evidence provided, however, does not support a strong performance rating.
- GDI programmes are based on industry-prescribed material and content. Experienced tradespeople train their students, using a mix of classroom-based theory, practical learning in fit-for-purpose workshops and work experience in a local trades business. There is evidence of some effective teaching taking place. New staff appear to be well supported. Assessment and moderation is sound overall, although there are gaps. GDI provides some good support and guidance to keep a proportion of the students engaged.
- The effectiveness of GDI governance and management is variable and at times weak. The newly appointed centre manager is well respected and an experienced leader. However, some of the systems used to track educational achievement are not suited to the current tertiary education environment.

### Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Gisborne Development Incorporated.** 

The self-assessment undertaken does not address some key areas of the organisation and the information collected is of variable quality. The key points supporting this judgement are:

- GDI has a reasonable understanding of individual and class educational achievement, but a limited understanding of how many students are achieving. The prime measure of educational achievement – tracking total credits achieved by all students – is not a meaningful measure. The PTE has not monitored qualification completions or benchmarked against contracted outcomes or similar Youth Guarantee providers. Qualification completions have not improved over the past four years.
- The data gathered for tracking employment and further training outcomes is of variable quality. There was some evidence of this information being used to inform decision-making.
- GDI has a good understanding of the needs of local trades employers, and has often been responsive to their needs.
- The automotive programme teachers have reviewed some of their practices and significantly improved their internal moderation practices.
- There is no systematic feedback gathered and analysed from students, graduates or employers; GDI relies on more informal oral mechanisms to judge students' performance. Similarly there was no evidence of a formal review of the effectiveness of the support and guidance provided.
- Overall, there is not a clear and consistent approach to self-assessment across the organisation.

## Findings<sup>1</sup>

#### 1.1 How well do learners achieve?

The rating for performance in relation to this key evaluation question is Poor.

The rating for capability in self-assessment for this key evaluation question is **Poor.** 

GDI provides foundation trades training to young people who are not in education or employment, to go on to apprenticeships, paid work and further education. There is evidence that some students are making progress and learning. However, the evidence of student achievement is incomplete and the analysis inadequate. Based on the evidence provided at the EER, overall student achievement is therefore rated as weak.

The understanding of student achievement is mixed with one serious gap. Tutors and management effectively track the progress of each individual student and class in achieving unit standards. The students interviewed knew the units they needed to complete their qualification. The tutors and employers use job sheets and employer feedback forms to assess the performance of the students over time in the workshop or on their weekly work experience placements. Unfortunately, this rich and useful information is not collated and analysed to show the proportion of successful students and their level of progress. GDI tracks the total number of credits achieved, but this is not a current or meaningful benchmark to rate educational achievement.<sup>2</sup> Most importantly, GDI does not monitor how many students are completing each of their qualifications or programmes. In addition, the provider has not compared qualification and course completions against TEC contracted targets over time or against other Youth Guarantee providers. The PTE has not tracked the achievement of Māori students, as required by NZQA.<sup>3</sup> It is probable that the students who became apprentices (13 per cent of the total students in 2015) achieved well at GDI.

The EER team analysed the PTE's TEC published data. Table 1 shows that fewer than one in five GDI students achieved a qualification, well below both the TEC contracted target of 40 per cent and the rate of most other Youth Guarantee providers. This was a weak result. Māori students are completing qualifications at a similar rate to other GDI students. The external moderation reports give confidence that the GDI educational results are reliable for making judgements about student achievement. The provider would better able to show the

<sup>&</sup>lt;sup>1</sup> The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

<sup>&</sup>lt;sup>2</sup> <u>http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/how-nzqa-evaluates-educational-performance-in-external-evaluation-and-review/</u>

<sup>&</sup>lt;sup>3</sup> There are generally few if any Pasifika students enrolled at GDI.

educational progress their students make if they tracked the often limited prior academic achievement and work readiness of the students when they enrol at GDI.

Year	All students	Māori students	National rate
2013	12%	12%	43%
2014	18%	17%	56%
2015	19%	Not available	Not available

Table 1. GDI qualification completions (%) 2013-2015, All and Māori students and national completion rates  $^{\rm 4}$ 

Source: TEC published performance data.

1.2 What is the value of the outcomes for key stakeholders, including learners?

The rating for performance in relation to this key evaluation question is Adequate.

The rating for capability in self-assessment for this key evaluation question is **Adequate.** 

GDI has strong and established relationships with the local trade sector and understands what these employers need. They require young employees who have good work habits and attitudes and foundation-level technical and work skills. The EER team interviewed a few employers and the apprentices they had taken on in 2015. These stakeholders mostly agreed that GDI had prepared their graduates with a good work ethic and real-life work-readiness and a basic technical proficiency. There was some evidence that GDI is a primary source for apprentices in some trades for the local region. The industry training organisations' reports and the representatives spoken to view GDI overall as a sound trades training provider responding to the needs of the sector. This was a strong outcome for the employers and the seven apprentices they employed. There was, however, no feedback gathered from the other recorded employers of the fourteen 2015 graduates who were not apprentices.

The GDI students interviewed said they seek apprenticeships, preferably for work in trades, or further training to assist them to gain work. There was evidence of variable quality showing between 77 and 92 per cent of students each year over the last four years gained an apprenticeship, paid work or went into further training. These percentages indicate a strong result for these students. There was reliable evidence that between 12 and 16 per cent gained an apprenticeship. Over the same period, there were basic records showing that a significant, though declining, proportion (46, 43, 32 and then 27 per cent) gained paid work. However, the evidence provided did not show where these students worked, their role, and how many were in trades-related employment or otherwise. Seasonal employment to

<sup>&</sup>lt;sup>4</sup> The method GDI used for collecting course completion data did not provide useful information.

some extent, is available in the Gisborne region to those without trades training; so this type of employment is less significant than gaining work in trades-related industries. GDI needs better to explain and evidence how their training assists their students to gain different types of employment. Thirty to 44 per cent of total GDI students were reported as going on to further training.<sup>5</sup> There were no details provided or analysis undertaken about where they trained, or the type or level of training the students undertook. GDI did not identify how many students were reenrolling at GDI the following year; TEC data indicates the numbers doing so were significant. It was noted in Findings 1.1 that just between 12 and 19 per cent of the students each year gained a qualification in the last three years. There was no formal feedback gathered from exiting students or graduates identifying what they had gained from their GDI training. It is clear a minority of students gain significant value from GDI training. The evidence is unclear about what value the training offers the remainder.<sup>6</sup> Due to the lack of sound evidence and analysis of these destinational outcomes, a strong performance rating is not warranted.

1.3 How well do programmes and activities match the needs of learners and other stakeholders?

The rating for performance in relation to this key evaluation question is **Good**.

The rating for capability in self-assessment for this key evaluation question is **Adequate.** 

GDI has a range of established relationships and is actively engaged with the trades industries. There is reasonable evidence from employers, students, industry training organisations as well as GDI staff and documents reviewed, that the programmes are relevant and responsive to the needs of key stakeholders.

Programme and activities are structured to support learning. The GDI Pathway programmes use materials prescribed by the relevant industry training organisations, with one exception<sup>7</sup>, so students can gain nationally defined certificates. Each student has an individualised schedule of unit standards that provides a pathway to qualification completion. Students interviewed were clear about how many unit standards they needed to complete for their qualification.

<sup>&</sup>lt;sup>5</sup> This does not include those students gaining an apprenticeship

<sup>&</sup>lt;sup>6</sup> One tutor had kept his own personal record of his 2015 class results. Of the 10 enrolled students, four gained a qualification (two of these four have been offered employment and an apprenticeship), four students returned in 2016, and two students did not complete the course. This evidence indicates positive outcomes for the majority of the class.

<sup>&</sup>lt;sup>7</sup> There are no developed materials by the Building and Construction ITO, the industry training organisation responsible for the painting and decorating trade; the ITO has approved materials that GDI submitted for pre-moderation.

The daily schedule is classroom learning in the morning, with workshop activity in afternoon. Work-based learning takes place with an employer each Friday. Students complete written notes about their work-based learning using a structured template, reinforcing student learning and providing tutors and employers with an opportunity to assess learning. There is ongoing formal and informal feedback provided to the students on their performance. Literacy and numeracy is assessed on enrolment, but not clearly monitored as the funder requires. The PTE has reasonable concerns about the accuracy and overall value of the TEC assessment tool. However they need to develop a more systematic way to track the literacy and numeracy progression of their students.

There was some limited evidence of the programmes and activities being reviewed. The students interviewed during this EER said the programme overall was working well for them and better than their learning experience at school. The industry training organisation site visit reports made mostly favourable comments about programme delivery. Formal student feedback forms have not provided useful information, yet the PTE has not explored other ways to identify how well the programmes are meeting the students' needs. There was evidence, particularly with the automotive programme, of programme changes being amended, such as some elective unit standards being changed. GDI has provided feedback to the industry training organisations on the quality of their materials and has been active in the NZQA-initiated targeted review of the trades qualifications.

#### 1.4 How effective is the teaching?

The rating for performance in relation to this key evaluation question is Good.

The rating for capability in self-assessment for this key evaluation question is **Adequate.** 

There is reasonable evidence that the teaching is generally effective. GDI employs experienced tradespeople that the employers who were interviewed respected and viewed as knowing clearly the required industry standards. The industry training organisation representatives, supported by some site visit reports, had general confidence in the quality of teaching at GDI.

A range of teaching approaches are used which suit the trades context and were valued by the students who were interviewed. GDI presents the tutor/training relationship as an employer/employee relationship to model to the trainees about how to behave in a trades environment. The hands-on learning in the workshop was seen as the most effective and most preferred teaching method because of its close similarity to a real workplace and to the majority of students' learning preferences. The fit-for-purpose workshop facilities are designed to prepare entry-level trades workers. Experience working in a real workplace was another key approach to consolidate and develop the abilities of the students. This applied learning is supported by classroom teaching, using pre-moderated materials and video resources accessed from the internet. Students spoke of the tutors 'breaking *Final Report* 

things down', patiently covering a topic in sufficient depth and breadth. Tutors provided extra support for students with literacy, numeracy and comprehension difficulties.

Assessment and moderation practice is satisfactory. There was evidence of informal and formal assessment taking place that was suited to the workshop environment. External moderation reports show that GDI assessment practices consistently meet the required national standards. However, the MITO report in 2014 also identified that formal internal moderation practices were absent. The EER team found that substantive and scheduled internal moderation had been implemented in the automotive trades programme. GDI plans to roll out this systematic approach across the organisation, and this improvement is required in the other programmes.

The self-assessment of teaching was variable in its quality. The formal feedback gathered from students was viewed as not being helpful for improving teaching practice, but no other processes had been trialled. The random selection of students interviewed during the EER were positive about the teaching of their tutors. There were clear signs of more experienced staff actively and effectively supporting new tutors to develop their teaching practice. Two experienced tutors have adult education qualifications, and the three newer tutors are currently enrolled in adult education qualifications. It is not clear whether formal observation of teaching took place, and the performance appraisal process looks rudimentary.

#### 1.5 How well are learners guided and supported?

The rating for performance in relation to this key evaluation question is **Adequate**.

The rating for capability in self-assessment for this key evaluation question is **Adequate.** 

There is reliable evidence that the guidance and support GDI provides helps some students to stay engaged in their studies. Evidence came from the key stakeholders interviewed and student files. However, the evaluators have reservations about the effectiveness of the support and guidance, given the significant proportion of GDI students not completing their studies.

GDI is a small, close-knit team, including both the office staff and trainers, who provide a whānau/family-type culture. Each student is known to staff given the high ratio of full-time staff to students at 1:8. All tutors provide guidance to students on a range of work and broader issues. Challenging individual cases were mentioned where family were involved in addressing the students' needs.

There is a systematic tracking of unit standard achievement to support students to complete their studies. For instance, tutors from one trade use a wall-chart showing the assessments required to pass. Students said this was a visual reminder and created a competitive environment that helped them to remain engaged. Student assessment plans and the implementation of action plans show *Final Report* 

there is a system that has been operating to support achievement. GDI students at times go out to do seasonal work and can return later to complete their programme. However, this approach is not well tracked and the retention rates are not clear. Some apprentices return to GDI tutors to get additional support after hours to complete their studies. The modern apprenticeship coordinator makes visits to the apprentices' workplaces. Employers valued that GDI tutors turn up on site to check on the progress and attendance of their work experience students. The students who were interviewed liked the friendly and relaxed atmosphere at GDI, including the banter reflecting a real-life trade environment. They also liked that they were expected to behave like paid trade staff: be on time, get themselves to work, and take the lead in arranging their own work experience. They felt confident to voice their opinions with tutors.

There is some evidence that GDI informally reviews the effectiveness of support and guidance given to individual students. The acquired experience of the manager and more established tutors was being passed on to newer staff. However, there was no indication of a systematic review of the overall effectiveness of the support and guidance to meet student needs so that higher numbers stay engaged and complete their studies. The absence of a formal review was identified in the last EER report. This is a significant gap given the high proportion of students not completing their studies.

## 1.6 How effective are governance and management in supporting educational achievement?

The rating for performance in relation to this key evaluation question is **Adequate**.

The rating for capability in self-assessment for this key evaluation question is **Poor.** 

GDI has a clear purpose to develop young people so they can pathway to industrybased apprenticeships, employment and further training. The permanent centre manager, who was the previous office manager, had been appointed to the role just one month before the EER visit. The new manager has the confidence of the chair of directors, staff and is respected by various key external stakeholders. GDI has a long-term reputation as an effective trades training provider among these stakeholders. The centre manager is seen as a capable and supportive leader, and has clear knowledge of the trades and education in this context. The organisation has recruited and retained some experienced trade staff as tutors.

However, there are some significant gaps in both the governance and management of this PTE. It is concerning that the measures GDI uses for monitoring student achievement and outcomes appear to be based on measures from the FFTO funding contracts (which ceased in December 2014) and earlier versions of Youth Guarantee funding contracts. The provider does collect some rich achievement information, but has not effectively reviewed and used this information. The destination information provided was rudimentary and was minimally analysed (the exception being those going into apprenticeships). The governance of the PTE has *Final Report*  ensured GDI is financially prudent but does not systematically monitor and review how well the organisation is meeting its core identified purpose, and specifically its TEC-contracted outcomes. The directors will soon include someone with a trades background.

More generally, there is not a whole-of-organisation commitment to robustly review performance across key priority areas to drive ongoing improvement. The key performance measures have been static for the past three years. There have been numerous gaps identified in this report. There are some signs of improved selfassessment in the management of the automotive programme.

### Focus Areas

This section reports significant findings in each focus area, not already covered in Part 1.

#### 2.1 Focus area: Governance, management and strategy

The rating in this focus area for educational performance is **Adequate**. The rating for capability in self-assessment for this focus area is **Poor**.

#### 2.2 Focus area: Foundation Trades Training

The rating in this focus area for educational performance is **Adequate**.

The rating for capability in self-assessment for this focus area is Adequate.

## Recommendations

NZQA recommends that Gisborne Development Incorporated:

- Track the prior academic achievement and work readiness of the students when they enrol at GDI. Analyse their education achievement to better show the progress they make while at GDI.
- Systematically monitor and review key educational performance indicators, including: completions of the qualifications and programmes offered, student retention rates, progression to higher-level study and re-enrolments, as well as trade and non-trade related work outcomes.<sup>8</sup>
- Develop a more systematic way to gain useful feedback from students, graduates, and employers that is effective in a trades industry context. Use this feedback to help guide decisions to improve performance.
- Review the effectiveness of the support and guidance that GDI offers, including identifying key factors that affect completions, and using recognised good practice.
- Strengthen the governance of the PTE to provide stronger oversight of performance, including clear reporting of educational performance, specific performance measures and enhanced governance capability.
- Access recognised external expertise while drawing on the experience and capability of the current GDI team, to assist in implementing these changes.

<sup>&</sup>lt;sup>8</sup> <u>http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/how-nzqa-evaluates-educational-performance-in-external-evaluation-and-review/</u>

## Appendix

### Regulatory basis for external evaluation and review

External evaluation and review is conducted according to the External Evaluation and Review (EER) Rules 2013, which are made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

Self-assessment and participation in external evaluation and review are requirements for maintaining accreditation to provide an approved programme for all TEOs other than universities. The requirements are set through the NZQF Programme Approval and Accreditation Rules 2013, which are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

In addition, the Private Training Establishment Registration Rules 2013 require registered private training establishments to undertake self-assessment and participate in external evaluation and review, in accordance with the External Evaluation and Review Rules (EER) 2013, as a condition of maintaining registration. The Private Training Establishment Registration Rules 2013 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes and/or registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the External Evaluation and Review (EER) Rules 2013.

The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

External evaluation and review reports are one contributing piece of information in determining future funding decisions where the organisation is a funded TEO subject to an investment plan agreed with the Tertiary Education Commission.

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz).

The External Evaluation and Review (EER) Rules 2013 are available at http://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/EER-Rules.pdf, while information about the conduct and methodology for external evaluation and review can be found at http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/.

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