

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

External Evaluation and Review Report

Front-Line Training Consultancy Limited

Date of report: 22 June 2021

About Front-Line Training Consultancy Limited

Front-Line Training provides foundation-level vocational education and training as well as employment placement services to youth and adult students, to meet the needs of the business and service sectors.

Type of organisation:	Private training establishment (PTE)		
Location:	416 Dee Street, Invercargill		
Code of Practice signatory:	No		
Number of students:	587 (137 equivalent full-time students in 2020) Māori 137 (23 per cent), Pasifika 10 (2 per cent)		
Number of staff:	16 full-time equivalents		
TEO profile:	Front-Line Training Consultancy		
Last EER outcome:	NZQA was Highly Confident in the educational performance and Confident in the capability in self-assessment of Front-Line Training at the last EER conducted in June 2016.		
Scope of evaluation:	Youth Guarantee-funded delivery; students are enrolled in programmes leading to the New Zealand Certificate in Foundation Skills (Level 1); New Zealand Certificate in Hospitality (Level 2); New Zealand Certificate in Retail (Customer Service and Sales Support) (Level 2); and the New Zealand Certificate in Tourism (Introductory Skills) (Level 2)		
MoE number:	9671		
NZQA reference:	C45731		
Dates of EER visit:	30 March-1 April 2021		

Summary of Results

Front-Line Training is meeting well the important needs of its students and key stakeholders. The PTE has a robust culture of self-review that has been mostly effective across many key areas, supporting some significant and ongoing improvements.

Highly Confident in educational performance	Student achievement is generally strong. The majority gain qualifications; Māori students achieve well. Nearly all graduates progress to further study or employment. Students develop core life/workplace skills, and their wellbeing improves. Front-Line is also highly effective at placing its Ministry of Social Development clients into sustainable employment.		
Confident in capability in self- assessment	Two recently approved programmes match well the important needs of students, staircasing them from a structured to a more independent approach to learning. This prepares them well for work or study. Well- qualified, experienced and capable teaching staff are committed to supporting student to progress. There is a systematic whole-of-organisation approach to pastoral care.		
	The established and able leadership team effectively supports high performance, through a culture of high expectations and often robust self-review of many key activities. The programme review was of high quality and led to clear improvements. However, it was an oversight to not comprehensively track completions, though the impact was not significant. The management of important compliance requirements is generally strong.		

Key evaluation question findings¹

Performance:	Good	
Self-assessment:	Good	
Findings and supporting evidence:	The EER focus area was Youth Guarantee-funded students who have not had success in mainstream education. Front- Line is effective in supporting these students to achieve. Students learn relevant knowledge and skills. The majority ga qualifications: generally, this is their first formal qualification. ² Assessment and moderation practice gives confidence in the validity of these results. Students improve their literacy and numeracy, though the assessment tool evidence was mixed. Course completions are similar to or lower than the PTE sector median, but qualification completions are mostly higher. Māor students generally achieve at similar or higher rates than non Māori. This is a significant accomplishment. Overall achievement is generally strong. The tracking of individual and cohort completions is systemation Detailed information is used to effectively support individual students and cohorts to complete. However, while the PTE monitors aggregate completions, its monitoring was not direct aligned with the Tertiary Education Commission performance	
	indicators. Some benchmarking was undertaken. The impact of this gap on achievement is limited.	
Conclusion:	Educational achievement is generally strong. The self- assessment of achievement is mostly sound, supporting students to complete and achieve.	

1.1 How well do students achieve?

¹ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

² Refer to Appendix 1, Tables 1 and 2 for further details.

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

Performance:	Excellent
Self-assessment:	Excellent
Findings and supporting evidence:	Front-Line's training and related services offer students, business clients, funding agencies and community stakeholders high quality outcomes. Many students on the Youth Guarantee programme are retained, achieve their educational goals and personally develop. Their lives and wellbeing improve, and they become more connected, though the quality of evidence for this could be strengthened. Graduates apply their knowledge and skills in the workplace and in their daily lives. Ninety-five per cent (58/61) of graduates from 2018-2020 progressed to further study or employment. Detailed and analysed destination evidence validates these excellent outcomes. ³
	Employers value gaining employees with the required entry-level attributes. Community stakeholders value how Front-Line provides meaningful pathways for youth at risk and the contribution their graduates make to the region. Consistency review submissions have significantly improved and convincingly show Front-Line's graduates were demonstrating the intended graduate profile outcomes.
	The Ministry of Social Development southern regional manager rated Front-Line as often ⁴ the highest-performing organisation in the region for placing its clients into sustainable employment.
Conclusion:	Front-Line consistently delivers high-value outcomes for its students and key stakeholders. It has collected and analyses mostly high-quality information, which has improved since the last EER.

³ Refer to Appendix 1, Table 3 for further details.

⁴ If not highest in a year, Front-line was the second highest.

1.3 How well do programme design and delivery, including learning and assessment activities, match the needs of students and other relevant stakeholders?

Performance:	Excellent
Self-assessment:	Good
Findings and supporting evidence:	Since the last EER, Front-Line has developed two new approved programmes with a stronger vocational focus. The programmes staircase students from an initially highly structured learning approach to more independent learning, preparing them well for entry-level employment or further study. Front-Line brings in guest speakers, students visit local businesses/places of interest, who offer them work placements (for example, with Age Concern and a local hotel) and students develop small business projects. Through this activity students improve their work and life skills. The PTE is highly engaged with employers and is familiar with their needs through its employment placement service and the training delivered to business clients. There are clear expectations of student dress and behaviour which supports the students to be work-ready and aids their personal development.
	Front-Line has a strong emphasis on maintaining educational standards. Literacy and numeracy are integrated into assessment and delivery, such as calculating the fruit needed to make jam after visiting a blueberry farm. There is a sound approach to assessment. External moderation results have been generally strong. However, internal post-assessment moderation is not systematically scheduled. Student feedback is positive about the small classes and the delivery being engaging and the content relevant to their lives. For example, they are taught how to maintain a car. An NZQA programme monitoring report (26 March 2021)
	commended the quality of the programme review undertaken. There is ongoing review of the programmes, which is reflected in a Type 2 change being approved in early 2020.
Conclusion:	The new programme design and delivery match well the needs of students and key stakeholders. Self-assessment practice is generally strong.

1.4 How effectively are students supported and involved in their learning?

Performance:	Excellent		
Self-assessment:	Excellent		
Findings and supporting evidence:	Front-Line has a long-term commitment and well-earned reputation for effectively supporting students who have had disrupted education and often strained relationships with their families/whānau. Front-Line has developed a family environme that wraps around its students. It employs trained teachers who empathise with their youth students and systematically monitor their educational achievement. Sometimes the family is involve in providing pastoral care. A case study selected for the EER reflected this high level of pastoral care. The PTE also clearly targets students who have the capability to study and achieve foundation-level, vocationally focused qualifications. Communit stakeholders who were interviewed witnessed Front-Line often having a significant, and sometimes critical, impact on its youth students.		
	Front-Line undertook a robust review of its domestic pastoral Code of Practice ⁵ in 2021, concluding it had implemented most of the key outcomes. A formal learner council has now been established to strengthen the student voice. During the EER process, student representatives actively voiced concern and had confidence that matters raised were addressed by management. The students highly rated the overall support they received.		
	Front-Line has been effective in supporting many students to successfully complete their studies. It is notable that Front-Line has attracted significant Māori enrolments and these students have generally achieved well. ⁶		
Conclusion:	Front-Line is highly effective in supporting students to stay involved in their learning. The organisation actively reviews how well it supports its students, and makes improvements as necessary.		

⁵ Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice 2019

⁶ See 1.1

Final

1.5 How effective are governance and management in supporting educational achievement?

Performance:	Excellent			
Self-assessment:	Good			
Findings and supporting evidence:	Front-Line has a clear and established purpose and direction. It has developed strong relationships with key stakeholders. The PTE has a reputation for professionalism, integrity and duty of care to its students/clients. It has developed a range of effective systems and procedures to support consistent practice. The leadership team of this small organisation is experienced, capable and evolving. The director is conscious of the importance of continuity and the need to effectively address this matter. The leadership have engaged, generally retained and supported qualified teachers committed to meeting the complex needs of the students. There is a coherent and organised approach to providing substantive professional development. Front-Line was well-placed to effectively respond to the COVID- 19 lockdown with hardware and software in place to enable remote learning.			
	The organisation has an authentic, reflective culture of self- review which supports ongoing improvements across many key activities. This report notes some gaps in achievement data analysis, moderation as well as compliance. However, these gaps have not had a significant impact on overall educational performance and have been generally effectively managed.			
Conclusion:	The Front-Line leadership team effectively supports a generally high level of educational performance that meets the important needs of the students and stakeholders. Any gaps have not had a significant impact. There is a generally robust system of self- review which has supported a range of improvements.			

1.6 How effectively are important compliance accountabilities managed?

Performance:	Good			
Self-assessment:	Good			
Findings and supporting evidence:	 Front-Line has a range of sound systems and practices in place to manage its key compliance requirements. The key points are: A NZQA programme monitoring report (26 March 2021) commended the programme⁷ review undertaken as 'Excellent', including confirming the programme was being delivered as approved, as did the Tertiary Education Commission audit (13 May 2020). The audit identified a few minor non-compliance issues to be addressed through an action plan. 			
	A Ministry of Social Development audit (2021) concluded that all its key requirements were met.			
	• Front-Line actively cooperates with and manages its subcontractor, Goldstar Training Limited, through an updated agreement. However, there is no overarching quality audit or monitoring of key requirements, including an explicit schedule for internal post-assessment moderation.			
	• Front-Line has mostly completed its NZQA compliance requirements in an appropriate and timely fashion. However, a small percentage of unit standard achievement results were reported late for Front-Line and its subcontractor.			
	• The organisation has participated in five consistency reviews from 2017-2020 and was (at the end of the process) rated 'Sufficient' in all. The latter submissions were of improved quality.			
	 The Code⁸ review was robust and led to some changes in practice, as previously noted. 			
Conclusion:	Front-Line has been mostly effective in managing its important compliance accountabilities. It has undertaken reviews that have brought about improvements.			

⁷ For the programme leading to the New Zealand Certificate in Foundation Skills (Level 1).

⁸ Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice 2019

Focus Areas

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

2.1 Focus area: Youth Guarantee funded delivery

Performance:	Excellent
Self-assessment:	Good

Recommendations

Recommendations are not compulsory but their implementation may improve the quality and effectiveness of the training and education provided by the tertiary education organisation (TEO). They may be referred to in subsequent external evaluation and reviews (EERs) to gauge the effectiveness of the TEO's quality improvements over time.

NZQA recommends that Front-Line Training Consultancy Limited:

- Strengthen the monitoring and analysis of qualification and course completions (including for priority groups), and relevant benchmarking.
- Systematically schedule internal post-assessment moderation to ensure more representative coverage of assessment activity over time (that includes Front-Line's subcontractor).
- Develop and implement a more integrated periodic audit of its subcontractor, Gold Star Training Limited.

Requirements

Requirements relate to the TEO's statutory obligations under legislation that governs their operation. This include NZQA Rules and relevant regulations promulgated by other agencies.

There are no requirements arising from the external evaluation and review.

Appendix 1

Table 1. Course completion rates 2016-2019 (Private training establishment level 1-3 average completion rates)

Years	2016	2017	2018	2019
All students	76 (70)	51 (71)	74 (74)	54 (80)
Māori	83 (63)	56 (66)	74 (66)	68 (66)
Non-Māori & Pasifika ⁹	71 (78)	49 (78)	76 (80)	46 (79)

Source: Tertiary Education Commission data

Table 2. Cohort-based qualification completion rates 2016-2019 (Private training establishment level 1-3 average completion rates)

Years	2016	2017	2018	2019
All students	66 (62)	64 (61)	48 (63)	66 (64)
Māori	100 (53)	77 (55)	49 (57)	58 (56)
Non-Māori & Pasifika	60 (69)	56 (67)	48 (67)	69 (65)

Source: Tertiary Education Commission data

Table 3. Destination outcomes for Youth Guarantee graduates 2018-2020

Years	2018	2019	2020
Enrolments	54	50	55
Total graduates	23	19	19
Employment	15	8	9
Education	6	10	10
Positive outcomes of total graduates	91% (21/23)	95% (18/19)	100% (19/19)

Source: Front-Line Training data

⁹ Pasifika enrolments are very small and are not presented as individuals might be identified.

Appendix 2

Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/. 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.

Disclaimer

The findings in this report have been reached by means of a standard evaluative process. They are based on a representative selection of focus areas, and a sample of supporting information provided by the TEO under review or independently accessed by NZQA. As such, the report's findings offer a guide to the relative quality of the TEO at the time of the EER, in the light of the known evidence, and the likelihood that this level of quality will continue.

For the same reason, these findings are always limited in scope. They are derived from selections and samples evaluated at a point in time. The supporting methodology is not designed to:

- Identify organisational fraud¹⁰
- Provide comprehensive coverage of all programmes within a TEO, or of all relevant evidence sources
- Predict the outcome of other reviews of the same TEO which, by posing different questions or examining different information, could reasonably arrive at different conclusions.

¹⁰ NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.

Regulatory basis for external evaluation and review

External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2016, which are made by NZQA under section 253(1)(pa) of the Education Act 1989 and approved by the NZQA Board and the Minister authorised as responsible for Part 20 of the Education Act.

Self-assessment and participation and cooperation in external evaluation and review are requirements for:

- maintaining accreditation to provide an approved programme for all TEOs other than universities, and
- maintaining consent to assess against standards on the Directory of Assessment Standards for all TEOs including ITOs but excluding universities, and
- maintaining training scheme approval for all TEOs other than universities.

The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2018, the Consent to Assess Against Standards Rules 2011 and the Training Scheme Rules 2012 respectively. These rules were also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister.

In addition, the Private Training Establishment Rules 2018 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration. The Private Training Establishment Registration Rules 2018 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, training schemes and consents to assess and 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 Quality Assurance (including External Evaluation and Review (EER)) Rules 2016. 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 (<u>www.nzqa.govt.nz</u>). All rules cited above are available at <u>https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/</u>, while information about the conduct and methodology for external evaluation and review can be found at <u>https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/</u>.

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