



NEW ZEALAND QUALIFICATIONS AUTHORITY
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Report of External Evaluation and Review

Royal Business College Limited

Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 22 December 2016

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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:	Royal Business College Limited (RBC)
Type:	Private training establishment (PTE)
First registered:	1 August 1996
Location:	447 Blenheim Road, Sockburn, Christchurch (Ground Floor and Level 1)
Delivery sites:	447 Blenheim Road, Sockburn, Christchurch (Ground Floor and Level 1) 60 Federal Street (Levels 2 and 3), Auckland 198 Federal Street (Level 2), Auckland 234-238 Jellicoe Street, Te Puke 215 Railway Road (Level 5, The Tower) Hastings
Courses currently delivered:	<ul style="list-style-type: none">• National Diploma in Business (Levels 5 and 6)• National Diploma in Computing (Level 5)• RBC Diploma in Computing (Level 6)• RBC Diploma in Business Management (Level 7)• RBC Diploma in Entrepreneurship (Level 7)• RBC Diploma in Information Technology (Level 7)• RBC Diploma in Horticulture (Level 5)
Code of Practice signatory:	Since 2002
Number of students:	Domestic: 37

International: 928. Most international students are from India (90 per cent).

The following number of international learners were enrolled at each campus at the time of the external evaluation and review (EER):

- Auckland: 417
- Christchurch: 294
- Te Puke: 163
- Hastings: 54

The programme with the highest enrolments is the level 7 Diploma in Management (363 enrolments). Enrolments in all level 7 programmes make up well over half of RBC's enrolments (519 enrolments).

Number of staff: 48 full-time and 20 part-time staff

Scope of active accreditation: Please refer: <http://www.nzqa.govt.nz/providers/nqf-accreditations.do?providerId=835222001>

Distinctive characteristics: RBC has been registered as a PTE since 1996. Educational delivery is face-to-face across five delivery sites. RBC mainly delivers business and information technology programmes to international learners from India.

Recent significant changes: Learner numbers have more than doubled since the last EER, from 630 learners in June 2014 to 1,440 learners in August 2015.

After the previous principal left the organisation, the Chair of RBC's academic advisory committee – an individual with significant educational experience, including providing advice at a senior level and in matters relating to quality assurance and quality management systems and processes – was appointed acting principal in September 2015.

Previous quality assurance history:

At the last external evaluation and review (EER) in 2014, NZQA was highly confident in RBC's educational performance and confident in its capability in self-assessment.

Since the last EER, RBC has been the subject of a lot of external monitoring and quality assurance activity. This EER was scheduled following a series of compliance concerns that arose. Table 1 in the appendix to this report provides a summary of issues that have arisen and which are discussed below.

Compliance concerns

Level 7 Diploma in Business Management

In February 2016, two NZQA evaluators from the ITP and Degrees team in NZQA's Quality Assurance Division evaluated RBC's delivery of the level 7 business management programme. Areas for improvement were identified. For example, the assessment moderation system is not considered effective as the level of sampling does not provide enough information to draw conclusions on the assessment of students. Teachers teach across all modules. This is not considered suitable at level 7 as students do not benefit from the expertise of lecturers in their specialist discipline areas.

NZQA also found that one programme module had been substituted for another without NZQA approval. At the time of the February 2015 visit, class sizes exceeded the maximum of 20 provided for in programme approval. Prior to the EER site visit, RBC has changed its class sizes and was actively undertaking site monitoring.

NZQA found that the occurrence of these issues did not show evidence of effective processes or procedures to review programme design or delivery.

RBC is required to submit an action plan to respond to these issues.

Unauthorised programme changes and delivery site

In May 2015, NZQA identified that RBC had made unauthorised changes to two programmes (changes for one programme were made in 2012). In June 2015, NZQA also became aware that RBC had been delivering from a non-approved site for over a year. The

site approval was subsequently granted in September 2015, and RBC reverted to delivery of the two programmes in line with the original programme approval.

Non-reporting of credits for two local programmes

NZQA issued RBC with a compliance notice in April 2015. RBC had not reported credits for learners enrolled in two of RBC's local programmes containing unit standards. RBC complied with the notice by reporting all previously achieved credits for the two programmes. One of these was its horticulture programme.

Horticulture: Not meeting consent and moderation requirements

Since 2012/13, RBC had not met the consent and moderation requirements of Primary ITO, the standard-setting body for horticulture standards. This meant that RBC also did not meet NZQA's consent to assess rules.

In June 2013, RBC agreed that it would not assess against and report any unit standards for which Primary ITO was the standard-setting body until all issues had been resolved. RBC continued to deliver the level 5 RBC Diploma in Horticulture. Despite being RBC's own programme, it still contained unit standards for which the ITO was the standard-setting body.

In July 2015, NZQA identified that RBC was continuing to use Primary ITO's materials and unit standards and copywriting the material as RBC's. In October 2015, NZQA imposed a condition on RBC's accreditation to deliver its horticulture programme. The condition contains two parts. One part required RBC to engage an assessment partner for its horticulture programme, and this has been met. The other part required RBC to stop enrolments onto the horticulture programme until it received the full confidence of Primary ITO. RBC has met that part to the extent that it has stopped enrolments. It intends inviting an ITO review of its capability once it has completed and embedded all quality improvement actions underway in that programme.

English language proficiency

In late 2014, Immigration New Zealand raised concerns that 56 per cent of visa applications for study at RBC were declined from India due to insufficient English language proficiency. RBC made changes to its enrolment process, including in-depth 'live' interviewing using Skype.

Following a monitoring visit to RBC in February 2016, NZQA wrote to RBC in March 2016 requiring evidence to show that English language requirements had been met for 14 students. In that letter, NZQA identified that since the October 2015 change to Rule 18 of the Programme Approval and Accreditation Rules 2013, Immigration New Zealand had declined visas for three students whose English language capability was unsatisfactory – two had been accepted for enrolment by RBC and one had a falsified document. NZQA communicated that at the monitoring visit it had identified one further student as having a falsified document.

Following the provision of information requested by RBC, NZQA wrote to RBC in May 2016 identifying that six students had been accepted onto RBC's programmes for whom there had not been evidence of the requisite English language proficiency certification – this reflected one of the 14 learners identified at the monitoring visit, the three learners referred to in NZQA's March 2016 letter as having had visas declined by Immigration New Zealand, the one learner that NZQA identified at the monitoring visit as having a falsified certificate, and one further learner subsequently identified by Immigration New Zealand in April 2016.

In response to the two instances of falsified documents, RBC has since instigated International English Language Testing System (IELTS) verification checks to contribute to the assurance of the authenticity of student certification.

Review by Deloitte on behalf of the Tertiary Education Commission

In late 2014, the Tertiary Education Commission (TEC) announced it would be completing focused reviews of six providers who had a high level of sub-contracting and/or programmes with high completion rates and/or

rapid growth. RBC was reviewed by Deloitte on behalf of the TEC in 2015.

The review focused on one level 5 and one level 6 programme. Key aspects of the review included whether programmes were being delivered in accordance with funding and programme approval requirements, complied with required teaching hours and weeks, and whether there was evidence of sufficient enrolment and assessment records.

Deloitte found no significant issues and did not recommend any further reviews. It gave some recommendations for improvement. The report can be accessed at:

<http://www.tec.govt.nz/Documents/Reports%20and%20other%20documents/Deloitte-report-Royal-Business-College-01-April-2015-Part-one.pdf>

NZQA national external moderation

RBC has met most NZQA national moderation requirements in 2014 and 2015:

- 2015 – 3 of 4 unit standards moderated fully met requirements
- 2014 – 7 of 9 unit standards fully met requirements.

Other:

In February 2016, the NZQA risk team undertook a monitoring visit to RBC's Auckland and Te Puke campuses. This visit focused on enrolment requirements (e.g. English language proficiency testing), classroom numbers and communal facilities, and compliance with the Code of Practice for the Pastoral Care of International Students. NZQA required some corrective actions, which have since been completed by RBC (e.g. amending handbook information and addressing classroom sizes).

2. Scope of external evaluation and review

The mandatory focus area Governance, management and strategy was included in the scope of the EER.

International learners was a focus area, since nearly all learners at RBC are international.

RBC's level 7 programmes were selected as one focus area, as this is an area where RBC has recently experienced significant growth. Level 7 programmes represent over half of what the organisation delivers. Selecting this focus area also aligned with a recent focus of RBC on obtaining agreements with higher learning institutes with the aim of developing academic pathway opportunities for RBC graduates.

Robustness and consistency of key policies and practices across the organisation was the other focus area. This focus area was selected because RBC delivers over four campuses and RBC had indicated some recent changes and improvements to strengthening engagement and sharing across delivery sites.

Level 5 and 6 programmes and domestic learners were not included as focus areas. The learner numbers were not as significant as RBC's international enrolments at level 7.

The horticulture programme was not included as a focus area since NZQA had already had extensive engagement with RBC around this programme and because there is currently in-depth work being undertaken by RBC and its assessment partner in this area. Key issues with that programme have been clearly identified and corrective actions are underway.

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.

Two evaluators conducted the EER.

All but one of RBC's four campus locations was visited. The evaluation team did not visit Hastings as this site had the smallest delivery and was visited during the previous EER. The evaluators conducted a phone interview with the Hastings director of studies (and level 7 tutor) during the EER.

The EER was conducted over four days. The evaluation team engaged with the following people for the EER:

- the director and acting principal

- the four campus directors
- teaching staff
- staff responsible for international students
- external stakeholders
- RBC's moderation partner for the horticulture programme
- two members of the academic advisory committee
- learners enrolled in level 7 programmes
- RBC graduates.

A range of information and documentation informed the EER including, but not limited to:

- key information relating to recent compliance concerns
- RBC's quality management system
- the student handbook
- campus reports
- learner, staff and stakeholder survey feedback
- moderation information
- RBC's 2016 self-assessment summary document 'self-assessment actions undertaken by RBC'
- quality improvement plans
- examples of peer observations and staff appraisals and performance reviews
- achievement and outcomes information
- memoranda of understanding and pathway agreements
- learner files.

Summary of Results

Statement of confidence on educational performance

NZQA is **Confident** in the educational performance of **Royal Business College Limited**.

RBC has some effective processes in place that contribute to strong learner achievement, including:

- Strong academic support that is provided immediately if learners fall behind
- A learning environment where learners feel safe and supported
- Skills seminars provided to learners to develop skills for the workforce
- Targeted recruitment to employ experienced and qualified teachers who are familiar with teaching international learners, the New Zealand tertiary environment, and the industries in which they teach
- Expectations about educational performance are clear to staff.

Graduation rates are high but need to be considered alongside some recent areas identified for improvement by NZQA relating to teaching, assessment and moderation (refer Findings 1.1 and 1.4).

There is good, but not comprehensive, evidence of graduates progressing to higher study, gaining employment and establishing successful businesses.

Programme content and teaching methodologies are tailored well to match the needs of international learners for New Zealand-specific business knowledge. Employer feedback confirms that RBC's programmes are relevant to industry. A higher learning pathway established with a polytechnic, and progress towards another learning pathway with a university, is a further indicator of the relevance of RBC's programmes.

Alongside evidence of generally strong performance, leading to positive outcomes for students, there are also gaps in RBC's policies and high-level management processes. These gaps have led to key compliance issues that concern external stakeholders. They have occurred alongside a significant increase in learner numbers, as well as a period of transition involving changes in organisation oversight, governance and management. The compliance issues are summarised in a table in the appendix to this report.

In 2015, NZQA placed conditions on RBC's accreditation to deliver its horticulture programme. Although RBC has made positive progress with that programme, a statutory condition will remain on RBC's delivery of the programme until RBC regains the confidence of the relevant industry training organisation.

Other more recent instances of non-compliance identified by NZQA include: the replacement of a programme module without NZQA approval, classroom sizes

exceeding programme approval allowances, and evidence of a small number of learners being offered places at RBC without the appropriate English language proficiencies or documentation. RBC has responded or is responding to these concerns, and has put in place some stronger processes as a result, such as regular site compliance monitoring and IELTS verification checks (in addition to interviewing prospective learners from India).

RBC emphasises that it has always responded promptly to address valid issues or concerns identified by NZQA. However, the overall occurrence of these issues raises questions about the robustness of RBC's understanding or oversight of compliance requirements at a governance and management level.

The evaluators considered that there were three areas where RBC's quality management system policies and documentary evidence needed to be more explicit: processes for assessing English language proficiency, programme changes and ongoing contact with parents of international learners under 18-years of age.

Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Royal Business College Limited**.

There are some effective self-assessment processes at RBC contributing to generally strong learner outcomes and the meeting of learner needs. However, since the last EER, there have been some key compliance issues and gaps in self-assessment. The compliance concerns identified in this report appear to have arisen because of some gaps in RBC's quality assurance processes. The issues were detected by external agencies rather than through RBC's own self-assessment. Therefore, on balance, NZQA is not yet confident in RBC's capability in self-assessment at this point in time.

RBC's self-assessment processes have been used to make useful improvements:

- RBC monitors learner achievement closely and acts immediately, at an individual learner level, to respond to non-achievement. These practices contribute to strong learner achievement results.
- A well-crafted stakeholder survey informs RBC's understanding of stakeholder needs and the relevance of RBC's programmes. RBC uses employer feedback to modify teaching and programme content and enhance the relevance and currency of training.
- The PTE regularly reviews learner satisfaction with programmes, teaching and guidance and support, then uses the findings to make improvements.

However, RBC needs to increase its oversight of compliance matters across the whole organisation. This is particularly important given the further instances of non-compliance NZQA recently found.

RBC did not provide robust evidence of its self-review of Code of Practice provision, though the annual review process verbalised by RBC does sound in-depth and appropriate – see further information about this under Findings 1.5). The need to better document processes as evidence of self-assessment activity and to provide opportunities for reflection is a common theme in this report.

RBC's academic advisory committee can provide only limited governance and management insight to the extent that the current membership is without specific academic expertise in business management at level 7 or higher. This situation may be affecting the robustness of programme review and contributing to the areas of non-compliance identified by NZQA recently in relation to RBC's delivery of the level 7 business management programme. RBC is currently seeking to expand the membership of the committee.

The quality and validity of self-assessment information is generally good in some areas. There are also some important areas where the quality and validity of self-assessment should be strengthened. There are opportunities for RBC to enhance the accuracy and parameters of its achievement data, which is a current focus for the organisation. NZQA does not consider that the extent of RBC's assessment sampling for moderation is effective or sufficient to reach conclusions on assessment.

Information on graduate destinations is a mix of actual and intended outcomes. It is not possible to gain a true picture of the extent of outcomes, as the different categories are not separately analysed. Also, graduate destinations and experiences are not tracked against pre-graduation goals. RBC is aware of this: they have very recently developed a discussion document for staff comment on the matter. In 2016 RBC intends to systematically track a sample of learners one year after graduation.

The evaluators found some small inaccuracies in the calculation of data. This perhaps shows that the organisation needs to oversee the accuracy of the information that they use and rely on. The instances the evaluators identified were not significant overall, but the data was unchecked and is the data the organisation relies on for self-assessment.

The annual reports for individual campuses are a useful improvement made by RBC using self-assessment information. However, the level of data analysed or presented is not always consistent. This impacts on the uniformity of performance information. While there is room to improve, NZQA also recognises that the reporting approach was new in 2015 and that some variation is expected. The campus reports are a worthwhile self-assessment initiative and provide some good insights on key performance matters at each campus.

Findings¹

1.1 How well do learners achieve?

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 **Good**.

RBC graduation rates appear consistently strong over the last two years, as seen in Table 1. The overall result meets RBC's internal target of a 93 per cent graduation rate.

	Overall	Christchurch	Auckland	Te Puke	Hastings
2014	96%	94%	93%	97%	100%
2015	95.5%	96% ²	95%	93% ³	98%

Source: RBC data

Graduation rates for level 7 programmes and across campuses (Table 2) are at a similar level in 2015.

	Christchurch	Auckland	Hastings	Te Puke
RBC Diploma Entrepreneurship (Level 7)	95%	93%	100%	100%
Diploma Business Management (Level 7)	94%	90%	97%	96.87%
RBC Diploma Information Technology (Level 7)	95%	93%	Not delivered	Not delivered

Source: RBC data

The figures exclude learners who enrolled later in 2015, but cannot complete until 2016 (due to rolling enrolments), and learners who have been granted an extension for completing. The data includes learners who enrolled later in 2014 and could not graduate until 2015.

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 The Christchurch and Auckland figures appear to exclude learners who have transferred to other RBC campuses. If included, they would each be around 90 per cent.

³ It would seem from the calculations that this figure should instead be 95 per cent.

Thus, the graduation rate represents the total number of learners graduating each year out of the total number of learners who are eligible to graduate. Learner withdrawals and non-completions are included and calculated in the percentages.

Table 3 shows learner non-completions out of all eligible completions in 2015 (excluding transfers to other campuses). There were low numbers of non-completions at each campus and in level 7 programmes in 2015 (mostly 5 per cent or less).

2015	Christchurch	Auckland	Te Puke	Hastings
Overall non-completions out of eligible completions	13/319 (4%)	34 ⁴ /588 (6%)	15/293 (5%)	3/87 (3%)
Level 7 non-completions out of eligible completions	7/187 (3%)	20/419 (5%)	3/104 (3%)	1/39 (3%)

Source: Evaluator's calculations from RBC data provided in individual campus reports

Some of RBC's calculations and campus figures include numbers of learners who have transferred to other RBC campuses, and some of this data does not. There were also a few miscalculations of data in the campus reports, with data in some reports less clear than others due to different analyses and presentation. While this does not impact significantly on overall organisation completions, it is an area that should be tidied up. A small difference in percentage (e.g. 95 and not 93 per cent) can be important for an organisation achieving in the 90-100 per cent range. RBC also expects each campus and programme to meet a 93 per cent achievement target in 2015.

The data calculation anomalies do not change the overall picture of strong achievement. RBC has also, very recently, developed a discussion document for staff aimed at establishing more specific parameters around collating and calculating graduation completion rates. This could potentially result in RBC tracking achievement by cohort, rather than by year. If adopted, this would strengthen the consistency and accuracy of data collation and would add to RBC's understanding of learner achievement.

Strong achievement is supported by close monitoring of the progress of individual learners. At each campus, weekly staff meetings focus on learner achievement, and teachers regularly report to campus and head office management about learner achievement at consistent intervals. If a learner falls behind, this is immediately picked up and addressed through an improvement action plan tailored

⁴ This is an approximate figure. Completion information provided for a level 5 and level 6 programme identify the graduation completion percentages, but it is not clear what the actual number of withdrawals are from the descriptions given.

to the individual learner. This process is consistently followed across campuses. Management expects this and closely monitors the results.

Other contributors to generally strong achievement are:

- Recruitment of experienced and qualified teachers
- Clear achievement targets and staff performance expectations
- Relevant programme content
- A safe, supportive academic environment.

Another effective initiative that supports learner achievement is offering learners professional development seminars run throughout the academic year. These seminars support the development of core skills important to employment and academic study, such as communication skills, report writing and referencing, and professional conduct. Diverse classroom learning methods are also valued by learners for the skills they develop (e.g. presenting, researching, and working as a team).

Despite the strong achievement data and processes contributing to and supporting learner achievement, the key evaluation question ratings in this area reflect NZQA's June 2016 findings that there are areas for improvement in RBC's teaching, assessment and moderation and which have a direct bearing on learner achievement results.

National moderation results in 2014 and 2015 confirm the validity of assessment in RBC's lower-level programmes, as far as these relate to NZQA-managed standards. However, NZQA does not consider that RBC's current level of assessment moderation sampling for level 7 is sufficient to reach conclusions about the robustness of assessment and thus the validity of achievement overall (see Findings 1.4 below).

The evaluation team saw a small amount of external post-moderation feedback which affirmed RBC's claim that external and internal moderation feedback was providing assurance of valid and fair assessment, but considered that RBC should summarise its overall external and internal moderation activities and results for level 7 programmes over time as this would provide a complete overview of its moderation and a useful evidential and self-reflection tool.

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 **Good**.

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

Learners interviewed for this EER identified that their programmes and study were meeting their goals of gaining New Zealand-specific practical business knowledge and skills in new fields. Feedback from graduates and employers interviewed for this EER and stakeholder survey feedback confirmed that RBC graduates come to employment with relevant knowledge and skills and desirable attributes (e.g. self-management).

RBC has facilitated higher education pathways for graduates through a memorandum of understanding with at least one New Zealand institute of technology. More recently, RBC has been engaging with two New Zealand universities and two polytechnics about potential further study opportunities for RBC graduates.

RBC's self-assessment data shows a graduate employment rate of 86 per cent. However, this figure includes graduates' intentions to seek employment and progress to further study, rather than just being the actual destination outcomes graduates achieved. In addition, some calculation errors with data at an individual campus level means the figure is more likely in the lower 80 per cent range. While the calculation errors are not major, they do have some impact on the overall data used by the organisation.

RBC confirmed that the destination data collected comes from a revised exit survey trialled in 2015 (implemented to improve knowledge of graduate destinations). The survey does ask about actual outcomes. However, the data has not been analysed to differentiate between actual and intended or desired destinations. Therefore, it is not possible to quantify actual outcomes. There is also some variation across campuses in how information is presented.

At the same time, it appeared that graduates from the Auckland campus had been contacted during the 2015 year, and actual outcomes reported. For example, of the 268 learners contacted, 188 are identified as being in employment, and 54 were in further studies.

During the EER, RBC, graduates, and employers shared a number of examples of longer-term outcomes for graduates, such as graduates having become managers and owners of New Zealand businesses (including franchises and locations across the country). There were many examples of past graduates, now employers, actively seeking to employ RBC learners and graduates and providing work experience to RBC learners. It would be beneficial for RBC to systematically record this information to build a body of information on longer-term outcomes for learners.

A very recent discussion document by RBC recognises the weaknesses of not identifying actual as opposed to intended outcomes. RBC also intends to trial a graduate survey in 2016 where graduates will be contacted one year after graduation to establish whether their intended post-RBC destinations have been realised, and to gather specific data related to their destinations (e.g. actual study and institution enrolled in, and the status of their employment). That will be a useful endeavour to understand how subsequent employment aligns with learner goals, and how studying at RBC has contributed to subsequent destinations. Currently this information is limited.

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**.

RBC understands learners' key motivations in enrolling in level 7 programmes. The PTE ensures that teaching and learning, content and delivery responds to learner expectations.

Learner survey feedback collected at the middle and end of the year confirms learner satisfaction with programmes and that programmes match learner expectations. Learners interviewed for this EER said their studies at RBC match their needs because RBC's programmes contain relevant practical knowledge and New Zealand-specific content. This is important to a common goal of gaining New Zealand business or IT knowledge.

In 2015 NZQA imposed a statutory condition on RBC's delivery of its horticulture programme due to concerns around the quality of the programme (refer page 6, TEO Context in the Introduction to this report). Thus it was not evident that this programme matched the needs of key stakeholders. Feedback from RBC's moderation partner identifies that RBC has made positive progress in the assessment and moderation of its horticulture programme. However, it still has work to do before it can engage Primary ITO to seek to regain its support and confidence. Until then, RBC cannot enrol learners into the horticulture programme.

The programmes that RBC offers enables learners to move to higher level programmes within the organisation. The establishment of credit recognition for earlier completion of degree study at one polytechnic is another indicator of relevant educational pathways facilitated by RBC. It also shows the relevance of the level 7 programme to that external stakeholder.

RBC advises that a university has just reviewed its level 7 delivery. The university wants to discuss the possibility of a memorandum of understanding that could pathway RBC's level 7 learners directly into Master's-level study. Currently RBC is

also engaging with another university about pathway opportunities for graduates of the level 7 business management programme.

RBC uses feedback from learner surveys to understand how it can improve programmes and activities. For example, RBC responded to feedback on the need to improve technology and has recently been focused on updating Wi-Fi and the computer system and access.

RBC has an effective stakeholder survey tool which is administered in each campus location. The organisation uses the resulting data to understand employer expectations and requirements in terms of subject knowledge and employee skills. This ensures the programme delivery is relevant and current. RBC also engages international agents to advise on learning areas of emerging interest and trends in demand.

Programmes are reviewed annually by head office. The process includes analysing data received from each campus, moderation feedback, stakeholder and learner feedback from the year and a review of the programme documentation. RBC collects a variety of information from different sources and at different times of the year to review programmes. Examples were shared to demonstrate how information was used to update programmes and activities. However, self-assessment would be improved by documenting individual programme reviews to capture the whole process and how the data is brought together and used. This would provide a key document for ongoing reflection on the programme.

NZQA's June 2016 monitoring report pertaining to the level 7 business management programme raises concerns with the effectiveness of programme review because of areas for improvement found by NZQA, and not RBC.

The evaluation team considers that there is a need for RBC to strengthen the external insight of its programmes, including by adding specific academic expertise at business level 7 or higher to its academic advisory committee. It is acknowledged that RBC's quality improvement plan for 2016 includes a focus on adding to the committee, an action that arose from the end of 2015 academic advisory committee meeting. Such insight could add to the programme review process from an appropriate external, academic perspective. The absence of this perspective may be a contributing factor to the areas suggested for improvement and identified by NZQA following its recent review of the level 7, business management programme.

In late 2014 or early 2015, RBC responded to Immigration New Zealand concerns about high visa decline rates in India by adding processes when assessing a learner's English language proficiency, including in-depth 'live' interviews with learners using Skype.

After the October 2015 change to Rule 18 of the Programme Approval and Accreditation Rules 2013, Immigration New Zealand and NZQA identified six students accepted onto RBC's programmes in 2016 who do not show evidence of requisite English language proficiency certification (refer to page 6, TEO Context in

the Introduction to this report). In two of these instances, the certification has been fraudulent. RBC has since begun using an IELTS online verification service to ensure the authenticity of IELTS documentation.

The evaluators consider that RBC could make its English proficiency testing policy explicit: e.g. state the requirement for an internationally recognised English proficiency outcome for learners from some countries. While all staff interviewed were aware of the requirements, a clearer policy would minimise the potential for issues to arise. While evidence of non-compliance with English language requirements appears to pertain to only a small number of students, it would be prudent for RBC to undertake a further review of its policies and procedures to ensure they are sufficiently robust.

To address some past issues that have arisen and to strengthen key processes, RBC could enhance its self-assessment by being more proactive rather than reactive. Some improvements made by RBC have arisen after concerns were raised by external stakeholders rather than by its own self-assessment processes.

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 **Good**.

Learners value the diverse experience and knowledge that teachers bring to their learning. A robust recruitment process ensures the presence of quality teachers. This process includes teacher observations and learner feedback on teaching.

Teaching staff across campuses are well qualified and experienced in their industries. They are purposefully recruited for their experience in overseas countries and postgraduate qualifications. There is positive feedback from learner surveys about the quality of teaching and assessment.

At each campus learners and teaching staff consistently described diverse teaching activities. Learners valued these activities for stimulating and contextualising learning (e.g. learners researching individual companies, case studies, presentations, and facilitated group discussion) and providing an understanding of theory in practice. The evaluators saw, from a 2015 staff meeting agenda and notes sampled, that management clearly expects staff to use different teaching methods.

Teaching methodologies are inclusive, with a focus on group discussion and engagement, and peer learning. Teaching and learning is also reciprocal: teachers described learning from their students' experiences and ensuring learner's experiences are incorporated into teaching and learning.

RBC expects and supports all teachers to complete core assessment-related unit standards (e.g. 4098, 11551 and 11552), no matter their international and

postgraduate teaching qualifications, and international teaching experience. This ensures that teachers understand New Zealand-specific requirements, contributing to a consistent approach to assessment and moderation.

Learners described experiencing fair assessment practices that reflected their learning. They also felt that they understood the assessment requirements or teachers explained them well. Assessment feedback is timely, with assessments consistently marked within a week. Assessment marks are provided before RBC's internal post-moderation process. NZQA indicates that better practice would be for marks to be provided to learners after this has occurred.

NZQA has recently found areas for improvement with the depth and use of assessments in the level 7 business management programme. Assessments are generally not regularly rewritten and refreshed over time (unless a specific area has been identified requiring change). This could allow cohorts to collaborate to complete assessments in a formulaic way.

RBC's internal moderation process is functional, though NZQA considers that the current level of sampling is not appropriate for RBC's size and scope of delivery. This does not enable conclusions to be made about the assessment of students across the level 7 business management programme.

Each year samples of assessments for each teacher are moderated for two courses in each programme. Post-moderation is undertaken internally within each of the two larger campuses. RBC considers that small teacher numbers at the other two campuses makes it more beneficial to do cross-campus moderation there. All four individual campuses moderate samples of teacher's assessments from other campuses each year (cross-campus moderation).

Moderation relationships have been established with academics from different universities and polytechnics. These relationships provide external review of assessment materials and assessment samples. Feedback is used to improve assessments as required. NZQA considers it would be appropriate for RBC to instigate formal peer moderation of a higher percentage of assessments to support consistency of marking across tutors and cohorts.

RBC mostly fully met NZQA national moderation requirements in 2014 and 2015. This is one indication that the moderation action plan RBC implemented following the last EER was appropriate.

Teachers self-appraise their performance and receive feedback from their peers from teaching observations. They also review feedback from learner surveys. Teacher performance is reviewed by management. A recent organisation-wide initiative has been to link a teacher's individual quality improvement plans to teacher development objectives and the performance appraisal process.

It was not clear to the evaluation team that there is consistency across campuses in terms of how all of the inputs that inform the appraisal process are brought together for each tutor to review performance on an annual basis. This was because it was not obvious how RBC records all key information about teacher performance

across the year. Nor was it clear if the frequency and nature of teacher self-assessment activities occurs in the same way across RBC's teaching team.

Professional development is supported by management. An annual professional development plan guides each campus on core areas of focus for staff development. Staff potential is developed internally, and RBC seeks to use multi-campus offerings to broaden the career pathway opportunities available to staff.

RBC is responsive to teacher's resourcing requests and recently has acted to improve teachers' access to information technology across campuses. Teachers and staff value this responsiveness.

1.5 How well are learners guided and supported?

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 **Good**.

Learners receive strong academic guidance and support. As mentioned in Findings 1.1, learner progress is monitored closely and immediate support is put in place if a learner falls behind. There are individual learner action plans which focus on the individual support RBC will provide and timeframes to bring the learner back on track. This is a solid initiative contributing to strong achievement outcomes.

Student seminars that target professional development support learners to understand and gain core skills that will be important in future employment. These seminars were introduced in 2015 in response to learner and stakeholder feedback.

Attendance is monitored closely and consistently across campuses. The organisation expects 100 per cent attendance (unless there is good reason), and this is clearly conveyed to learners. RBC responds to attendance issues by talking to the learner and identifying why attendance issues are occurring. Written warnings are given if deemed necessary. As each campus can decide when to issue a written warning, this practice could potentially be supported by internal guidelines around the appropriate timing of issuing written warnings.

Pastoral care and support is appropriate, though the evidence presented of this did not seem as strong as that demonstrating the academic support provided for learners. Through the director's community standing and linkages, a network of culturally diverse support is available to learners from different cultural backgrounds.

RBC educates its agents about RBC and the information it requires learners to have. RBC spends time overseas to build relationships with agents and their staff and to provide training. Learners go through a learner orientation process when they arrive at RBC and key information is provided and explained to learners.

In February 2016, NZQA identified areas where information in the student handbook needed to be made clearer to more accurately reflect NZQA's core requirements (e.g. around refund policies and fees). RBC has updated the handbook as a result.

RBC reviews its compliance to the Code of Practice through an annual internal review that involves relevant staff from across each campus. The evaluation team considered that the overall process of documenting and evidencing this internal review could improve. A summary document provided to the evaluators on-site as an example of the occurrence of this annual review contained some minimal as well as incomplete information.

The evaluators did not see breaches of the Code of Practice occurring, but did consider that RBC would benefit from tightening how it records information that shows compliance. For example, while the evaluators were told that RBC provides parents of international learners who are under 18 years of age with verbal updates on their progress, this information is not recorded anywhere. The requirement and process for ongoing engagement with parents of international learners who are under 18 years is not stated in RBC's quality management system.

RBC does have useful self-assessment tools it consistently uses at each campus to understand the appropriateness of the support it provides to learners. An initial survey asks learners about the welcome and information they receive upon arrival. Then support for learners is assessed again at a midpoint survey, and an exit survey asks about the overall support and assistance provided. Learner feedback the EER team sighted was mostly positive.

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

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**.

RBC is focused on learner achievement and supporting pathway opportunities. This contributes to the elements of generally strong educational performance at RBC. This focus is supported by purposeful recruitment of qualified and experienced teachers and management, and using relationships with stakeholders to understand and match learner and employer needs. The director is actively seeking future opportunities for learners through relationships established with higher learning institutes, and with some success to date.

Many consistent processes and outcomes across each campus are achieved by management having clear expectations that are followed through with staff. There is also regular communications and reporting between staff and management.

Following a recommendation from the last EER to improve cross-campus liaison and sharing, RBC has focused on encouraging campus management teams to share successful initiatives that promote positive outcomes for staff and/or

students. This has included sharing an annual schedule for professional development, information about assessment practices, emails about good practice and learner contributions and achievements.

Teaching staff are sufficiently resourced, and governance and management are responsive to resource needs and requests. For example, issues raised with internet speed are being addressed, teachers have been supported with improved technology in the classroom, and recently the Auckland campus hired a staff member to assist learners to gain internships.

NZQA found some key compliance issues in 2015 relating to the quality of the horticulture programme, credit reporting, unauthorised programme changes and operating from a site without approval. These performance issues indicate a gap in RBC's monitoring and oversight of compliance matters. Mostly the compliance issues identified by NZQA have or are being responded to. There was a past issue of RBC not obtaining NZQA approval for a programme change that recently recurred – a programme module has been changed without approval.

Recent communications between NZQA and RBC relating to assessment changes signal that the organisation still does not have a complete understanding of the types of programme change that require NZQA approval. Therefore, it would seem appropriate for RBC to have a more detailed policy detailing when to seek NZQA approval. RBC does have a programme change policy, but it could be added to, for example by providing specific examples of changes that would require NZQA approval.

NZQA has recently identified areas for improvement in the level 7 business management programme and which RBC is currently working through. The individual issues and their impact have been referred to at Findings 1.1 and 1.4 of this report.

An NZQA monitoring visit in February 2016 identified that there were more learners than the numbers provided for in the level 7 business management programme approval, and also some concern about insufficient access to toilets. RBC has a site usage policy, and has since been actively planning and monitoring class sizes to ensure it is meeting requirements.

The evaluation team considered that RBC needs to strengthen some organisational policies and recording of information (see Findings 1.3 and 1.5). The organisation would also benefit from more regular and cross-organisation oversight and review of its compliance procedures. This would make the procedures more robust and address some past and recent compliance issues. There are also small miscalculations of outcomes data, which raises some question around the level of oversight when ensuring the accuracy and validity of information. This is important when governance and management rely on the data.

Quality improvement plans are devised at an organisational, campus, and individual staff level. RBC's academic committee is in some state of flux and RBC's 2016 annual quality improvement plan includes adding to its membership.

As stated in Findings 1.3, the academic committee currently lacks specific expertise in business management at level 7 or higher that is both external and academic. This may impact the effectiveness of any programme review.

In 2015, RBC introduced individual campus reports in response to an advisory committee wish to better understand performance at each campus. These reports are informative and provide detailed information about learner achievement, feedback and outcomes at each campus. Some reports are more analytical than others and the less analytical reports could be enhanced. An organisational level document that highlights and brings together information from each campus report would also add value.

Another useful self-assessment tool is the survey carried out annually by staff. This informs governance and management if staff feel sufficiently supported and understand organisational expectations. The evaluation team saw survey responses and heard staff feedback that confirmed that staff are positive about and feel valued by the organisation.

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 **Good**.

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

2.2 Focus area: Level 7 programmes

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

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

2.3 Focus area: Robustness and consistency of practice across sites

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

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

2.4 Focus area: International students

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

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

Recommendations

NZQA recommends that Royal Business College:

- Respond to effectively address areas for improvement identified in NZQA's June 2016 monitoring report of the level 7 business management programme.
- Review and update its quality management system and guidance to staff and learners to add more specific detail to procedures and requirements, particularly in areas where there have been concerns or changes in policies.
- Strengthen self-assessment practice and increase oversight of self-assessment information at a governance and management level. Improve the documentation of self-assessment activities.
- Ensure effective, regular review of its compliance to external stakeholder requirements, and continue to respond to areas for improvement that have been identified by external agencies.
- Build its academic advisory committee to include strong academic representation in the business management area, particularly at level 7.
- Further develop its self-assessment information to strengthen the understanding of learner achievement and outcomes, including how well learners' destinations link to their original goals.

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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Appendix Table 1: NZQA identified compliance concerns and areas to address and improve impacting on EER ratings

Identified concerns and areas to address and improve							
Horticulture programme	Non-reporting of credits - 2 local programmes	No NZQA programme change approval	No site approval (Te Puke)	English language proficiency	Class size	Information to students	Level 7 Diploma in Management
History of RBC not meeting ITO consent and moderation requirements. RBC not to deliver unit standards for which the ITO is the standard setting body but does so in its local programme <u>October 2015</u> Conditions placed on RBC's horticulture accreditation requiring RBC to have an assessment partner and stop enrolments till regains ITO confidence	<u>April 2015</u> Compliance notice issued by NZQA. Led to RBC reporting over 85,000 credits	<u>2015</u> NZQA identifies unapproved changes in two local programmes <u>2016</u> NZQA identifies a L7 programme module change made without NZQA approval	<u>2015</u> No site approval identified by NZQA. Site used since 2014	<u>2014</u> 56% visas declined in India for learners offered places at RBC <u>2016</u> - INZ/NZQA identify 6 learners not meeting English certification requirements. RBC introduces IELTS verification	<u>2016</u> NZQA finds classes exceed the 20 stated in programme approval	<u>2016</u> NZQA identifies the need to improve information in student handbook (e.g. fees)	<u>2016</u> NZQA monitoring report identifies areas for improvement: -Revise Level 7 learning outcomes and assessments -Assessment moderation system not effective (level of sampling) - Scheduling of lecturers to teach all modules not suitable at L7 -Issues not show effective programme review
Status of concern							
Positive feedback from assessment partner. Still working toward seeking ITO approval	Addressed 2015	2015 addressed, but one recurrence in 2016	Addressed	End 2014 RBC improves processes. Small number issues 2016	RBC changes class sizes. Introduces site monitoring	RBC amends handbook	RBC to submit action plan
Key Evaluation Questions (KEQs) where issues taken into account							
KEQ 3 & KEQ 6 self-assessment(SA)	KEQ 3 & KEQ 6(SA)	KEQ 3 & KEQ 6(SA)	KEQ 3 & KEQ 6 (SA)	KEQ 3 & 6	KEQ 3 & 6	KEQ 5	KEQ 1, 4 and KEQ 6(SA)

