



NEW ZEALAND QUALIFICATIONS AUTHORITY
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Report of External Evaluation and Review

Royal Commerce Company Limited
trading as Royal Business College

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 26 January 2018

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Final Report

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 Commerce Company Limited trading as Royal Business College
Type:	Private training establishment (PTE)
First registered:	1996
Location:	Christchurch Campus: 447 Blenheim Road, Upper Riccarton
Delivery sites:	As above and: Auckland Campus: 60 Federal Street, Auckland City 234-238 Jellicoe Street, Te Puke
Programmes currently delivered:	<ul style="list-style-type: none">• Royal Business College Diploma in Business Management (Level 7)• Royal Business College Diploma in Entrepreneurship (Level 7)• Royal Business College Diploma in Information Technology (Level 7)• National Diploma in Business (Level 6)• National Diploma in Business (Level 5)• Royal Business College Diploma in Computing (Levels 5 and 6)• General English

Code of Practice signatory:	Yes
Number of students:	<p>Domestic: 29 (29 EFTS (equivalent full-time students))</p> <p>International: 166 full-time students, mainly from India and China</p> <p>A total of 197 students were enrolled at the time of the external evaluation and review (EER) site visit. By comparison, 965 students were enrolled at the time of the previous EER in April 2016.</p>
Number of staff:	39 full-time equivalents
Scope of active accreditation:	http://www.nzqa.govt.nz/providers/course-accreditations.do?providerId=835222001&delSiteInd=0
Distinctive characteristics:	Royal Business College teaches mainly international students along with a smaller number of domestic students funded by the Tertiary Education Commission (TEC). The PTE delivers business and information technology programmes, and has a small number of general English students.
Recent significant changes:	<p>Royal Business College has ceased enrolling new students from India. Coupled with the impact of its Category 3 rating resulting from the 2016 EER, this has led to a significant reduction in student numbers and the recent closure of one regional site (Hastings). The future of another regional site at Te Puke is being monitored closely.</p> <p>A new director of studies has been appointed in Auckland and a new 'independent director' role has been established and an appointment made to this position.</p> <p>The academic advisory board has undergone some changes, with a retirement and additional new expertise added.</p>
Previous quality assurance history:	<p>External evaluation and review</p> <p>At the previous EER in April 2016, NZQA was Confident in the PTE's educational performance and Not Yet Confident in its capability in self-assessment. The evaluators made six recommendations, mainly relating to self-assessment and compliance.</p>

Approvals and accreditations

Since 2014 Royal Business College has made 10 site approval or programme applications to NZQA. Five were approved, three were declined and two withdrawn.

Tertiary assessment and moderation

In 2014-2016 NZQA externally moderated assessment samples for 15 standards from the accounting, business and management, and computing levels 5-7 moderation systems. Assessor decisions for 34 of 45 samples of student work were accepted. Assessments for three of the standards required modification.

NZQA level 7 diploma monitoring

NZQA made a monitoring visit on 9 December 2016 in relation to the Diploma in Business Management (Level 7) and Diploma in Entrepreneurship (Innovation of Business Management) (Level 7). Ten recommendations resulted from this visit. In total, 67 pieces of student work were also externally moderated. Ten of these should not have received a passing grade. The moderator also raised concerns about the authenticity of some student work. Some students' work was found to be below what would be regarded as a pass standard at this level. There was a lack of clarity in assessment tools as to which learning outcomes were being assessed, and instructions to students contained grammatical errors, were confusing, contradictory, or had unreasonable expectations. The apparent level of English, both of the students and the writers of the assessment tasks, was 'poor in several moderated samples'.

NZQA made a monitoring visit on 24 March 2017 in relation to the Diploma in Information Technology (Level 7). Twelve recommendations resulted from this visit. A total of 46 pieces of student work were externally moderated. Of the 46 samples of student work marked as a pass, one should have been marked as a fail. Also, while marking was consistent, most assessments were set at a level lower than would be expected in a level 7 programme, so students were not being assessed at the correct level. Assignments and tasks 'involved very little critical thinking or problem

solving. It was noted that in some instances, this has been addressed in some 2017 assessments’.

Numerous of these concerns had previously been identified in Royal Business College’s own internal programme review processes and action plans implemented to address them. Some modifications were made to the plans following consideration of the monitors’ reports.

Other:

On 11 May 2017, Royal Business College received a joint NZQA and Immigration New Zealand letter detailing concerns over Indian student visa decline rates. The letter stated that Royal Business College’s visa approval rate for Indian nationals applying for student visas in India for the period 1 January 2016 to 31 August 2016 was 24 per cent. The letter further stated that Royal Business College was expected to achieve a minimum of a 50 per cent approval rate for student visa applications by Indian nationals in India for January to March 2017. The letter specified expected improvements by the end of 2017. As noted above, the PTE has temporarily ceased enrolling new students from India.¹ Royal Business College campuses have undergone two visits from Immigration New Zealand representatives over the past year.

The TEC audited Royal Business College in relation to their funding provision for domestic students (1-3 May 2017). The PTE was funded by the TEC in 2016 to offer two qualifications: National Diploma in Computing (Level 5) – expiring December 2017 – and the Royal Business College Diploma in Computing (Level 6) – last date for entry May 2017.

The TEC audit made four key findings and recommendations relating to: the signing of enrolment forms; information provided in acceptance letters; segregation of duties between entering and updating

¹ Royal Business College comments: Royal Business College subsequently notified Immigration New Zealand (and NZQA) that it had ceased all recruitment in India as from November 2016. Royal Business College further affirmed it would not resume recruitment within the India market until it had secured the services of agents who had been vetted by Immigration New Zealand and had proven to act with integrity and have a record of successful visa applications.

data prior to SDR (Single Data Return) submissions; one instance of funding claimed for recognition of prior learning. There was also one finding relating to incomplete audit trails concerning the historical reporting of courses in the SDR for one programme; however, this was not material for funding or course completion reporting purposes. The matter will be resolved shortly as the programme is expiring.

Royal Business College completed the required self-review of the Education (Pastoral Care of International Students) Code of Practice in 2017.

Royal Business College has memoranda of understanding outlining pathways for its graduates with Lincoln University, the University of Waikato and Massey University.

2. Scope of external evaluation and review

Focus areas and rationale for selection

Three focus areas were included in this evaluation. Together they cover the majority of student enrolments and the mandatory focus area for international providers.

Focus Area 1: Royal Business College Diploma in Business Management (Level 7)
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First approved in 2013, this programme comprises Royal Business College's largest number of enrolments, with 67 students enrolled at the time of the on-site visit.

The programme is designed to prepare graduates for management careers or for higher studies in the fields of business management and/or business administration and planning. The programme is intended for students with previous qualifications or experience in the areas of business management, information technology, or tourism and hospitality, and who wish to acquire advanced theoretical and management knowledge and skills to pursue managerial roles within various business sectors within New Zealand or internationally, or to engage in further studies in the fields of business management.

Course design features: 125 credits; 44 gross weeks/42 teaching weeks; 20 hours teaching and 10 hours self-directed student learning per week.
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Focus Area 2: National Diploma in Business (Level 6)

First approved in 2012, this is the other main programme area, with 32 students enrolled at the time of the on-site visit.

The aim of this programme is to enable students to acquire a broad range of skills to manage and supervise staff. The programme will enable learners to study at degree level in New Zealand universities as well as at other tertiary institutions offering study in business and management.

Course design features: 124 credits; 40 gross weeks/36 teaching weeks; 25 hours teaching and five hours self-directed student learning per week.

Focus Area 3: International students: support and wellbeing

NZQA is committed to the responsible development and delivery of education to international students. It is essential to New Zealand's 'brand' to ensure that all students are adequately supported in their programmes of study. To that end, from August 2016, NZQA introduced a standard focus area for all EERs of tertiary education organisations that enrol international students. This focus area examined how effectively the organisation under review is discharging its pastoral care responsibilities towards its international students.

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.

A pre-scoping meeting was held with the principal before the on-site visit. A self-assessment summary document was supplemented with additional educational performance data and outcomes reports. Three evaluators conducted the on-site visit over three days. Personnel interviewed or otherwise contacted during this EER included: the director and other senior staff, members of the academic advisory board, employers of graduates and other community stakeholders, support services and administration staff, teachers from focus area programmes, current students and some graduates. An observer from an organisation supplying educational services to Royal Business College also attended much of the visit.

A significant proportion of the documentation viewed on site was selected at random based on reference by staff to Royal Business College's key tools and

processes during the interviews. The principal had also compiled a folder of key documents and this was also used by the evaluators, in particular to understand planning, monitoring and other review processes. Many of these documents are referenced within this report. Other notable documentation considered during this EER included: NZQA level 7 diploma monitoring reports; the 2017 TEC audit report; Royal Business College programme approval applications and other applications to NZQA. A small sample of recently marked work was selected from one campus for external moderation by the evaluators.

Summary of Results

Statements of confidence on educational performance and capability in self-assessment.

NZQA is **Not Yet Confident** in the educational performance and **Not Yet Confident** in the capability in self-assessment of **Royal Commerce Company Limited trading as Royal Business College**.

Although Royal Business College has been responding to meet the intent of the 2016 EER recommendations, there are still important areas of both educational performance and self-assessment that need further strengthening or at least consolidation before NZQA can express confidence in the PTE. Recent evidence from the NZQA diploma monitoring reports also supports this view – the quality of assessment tools and processes, and hence the quality of student learning and validity of their assessment across the programmes monitored, was below what is expected by NZQA.

Most students at Royal Business College are retained and complete their programme. Pass rates are high, more so for international students. This is, however, undermined by the diploma monitors' findings about some areas of weak academic quality. This is something that management and teachers are clearly working to strengthen. To give two examples, some assessment tasks have been rewritten and pre/post-moderation and sampling of marking has been increased. Other positive steps are the introduction of new anti-plagiarism software and strengthening the consistency and quality of learning materials available through the online platform to better align materials and timing of assessment across campuses.

Currently, Royal Business College has the staffing, systems, facilities and collective understanding in place to ensure a suitable level of support for both the international and domestic students. The PTE is appropriately monitoring its compliance with the Code of Practice, and undertaking the required annual review. There is an opportunity for a clearer focus on understanding how well the intended outcomes of the code are achieved. Regular student surveys show high satisfaction rates. These are useful for management monitoring across campuses and teaching staff. Other value from these surveys – such as a source of input into programme renewal or assessment change, or as a vehicle for feedback to students – is less apparent.

There have been changes and improvements since the previous EER, but most evidently in 2017.² Some have arisen from the PTE's own reviews, while others result from the college's responses to NZQA monitoring. For example:

- Governance and management has been strengthened with new appointments to the academic advisory board and the very recent appointment of an independent director.
- Academic leadership is being strengthened with the recent appointment of an Auckland campus head and the identification of additional heads of programme roles.
- Surveys of graduates and graduate employers have been improved, and the results are being used to understand the value of outcomes and the match between programme content and the labour market.
- Components of the quality management system have been rewritten and shared with staff. Refinements and improvements have also been made to internal monitoring and reporting.
- Improvements to educational delivery have included heightened attention to students' use of self-directed study time. The PTE has introduced additional seminars and academic tutorials, and stronger case study examples and online resources to support teaching and learning.
- Moderation policies and practices have been the focus of considerable attention, and the rewriting of assessment materials is well advanced. This is possibly the most crucial area of needed improvement and is progressing to a plan developed by the leadership of the PTE.

Royal Business College governance and management has a good, and improving approach to supporting educational achievement and managing its compliance accountabilities. Efforts to strengthen across-programme, across-campus academic quality are convincing. This includes improving self-assessment policies and processes, and developing staff competence to operate more effectively within an overall, coherent system. The direction is positive, but more time is required to show that any improvements are both embedded and sustainable.

² The on-site visit for the 2016 EER occurred in April 2016. The final report was not published until December 2016 following a reconsideration requested by Royal Business College.

Findings³

1.1 How well do students achieve?

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**.

Most students at Royal Business College are retained and complete their programme, and qualification pass rates are high (see Table 1). The programme content is appropriate for pathways into employment in business or information technology. Some students continue to higher-level study at Royal Business College or elsewhere. Data capture and analysis of results is clear, and performance is documented and reviewed across the organisational staff groups, including on an on-going basis. Benchmarking of pass rates includes cross-site, year-on-year, TEC sector data and Royal Business College target goal comparisons.

Table 1. Royal Business College enrolment and achievement data 2016

Programme ⁴	DBM	DENT	DIT	NDBL6	NDBL5	DCL5	DCL6
Enrolments	598	67	188	167	209	62	75
Non-completions	18	5	6	6	8	1	4
Completions	422	44	140	100	144	49	31
Graduation rate*	96%	90%	96%	94%	95%	98%	88%

Source: Royal Business College student management system and self-assessment records. Table excludes 'in-progress' students. Data includes TEC-funded students.

*Royal Business College's calculation method compares actual completions with those eligible to graduate.

³ The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

⁴ From left to right: Diploma in Business Management (Level 7) (DBM), Royal Business College Diploma in Entrepreneurship (Level 7) (DENT), Royal Business College Diploma in Information Technology (Level 7) (DIT), National Diploma in Business (Level 6) (NDBL6), National Diploma in Business (Level 5) (NDBL5), Royal Business College Diploma in Computing (Levels 5 and 6) (DCL5 and L6).

Three factors give caution to interpreting the high pass rates:

- Royal Business College has apparently been allowing a reasonably generous approach to pre-submission feedback to students on assignments; this is under closer scrutiny by management
- Resubmission and re-sits have also been reasonably generous⁵
- External monitoring of level 7 assessments has shown weaknesses in both materials and marking. Over 60 per cent of 2016 graduates studied at level 7, and numerous of these had progressed from lower-level Royal Business College programmes.

That said, these students are highly motivated to study and pass. Many have studied previously at tertiary level, although no specific data around this was noted in the PTE's self-assessment material.

It is appropriate that the robustness of assessment and the quality of internal and external moderation (and hence credibility of high pass rates) are now under closer scrutiny by both Royal Business College management and NZQA. Self-assessment is improving in this area.

Domestic (TEC-funded) students are (currently) enrolled solely at the Christchurch campus studying towards computing or business qualifications. TEC educational performance data for this cohort shows considerably lower pass rates by these 'zero fees' students than their international peers. Course completions were 90 per cent in 2015 and 76 per cent in 2016. Qualification completions also declined from 83 per cent to 63 per cent for the same period. Some Māori and/or Pasifika learners are also enrolled in this cohort. This evaluation did not focus on the smaller cohort of domestic students and so cannot give any reasons for these declines in course and completion rates.

Royal Business College reviewed the performance of its TEC-funded students. It identified that 'domestic students were often not as motivated to succeed with their studies as international students, and domestic students sometimes opted to take up employment opportunities. Consequently, they voluntarily terminated their studies'.

⁵ The business diploma monitoring report recommends that Royal Business College: 'Limit the number of resubmissions and resits across the programme as a whole, and limit the number of resubmissions/resits per assessment to one'. The information technology diploma monitoring report states that 'allowing 2 re-sits/re-assessments at Level 7 is excessive'.

Table 2. Royal Business College enrolment and achievement data – TEC-funded programmes 2016

Programme	National Diploma in Computing (Level 5)	National Diploma in Business (Level 6)
Enrolments	32	6
Non-completions	7	2
Completions	25	4
Graduation rate	78%	67%

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

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**.

Since the previous EER, Royal Business College has improved their survey processes in order to assess the value of outcomes for key stakeholders. Surveys provide sound evidence of most graduates gaining often programme-relevant employment. Graduates are achieving their most commonly stated goal of employment in New Zealand, with the subsequent possibility of gaining residence.

Institutional data was presented for 2015 graduate destinations. Employer and graduate evaluations of the level 7 programmes were collated and analysed. Analysis of survey data has been thorough and links employment outcomes to the programme studied. Royal Business College data shows that 127 employers were surveyed about 2016 graduate outcomes and attributes, providing very high ratings for both 'appropriateness of skills' and 'awareness of employer expectations'.

A course completion/exit survey is used to obtain information on the intended destinations of completing students once they have graduated. This information is later compared with the actual outcome as per the post-graduation surveys summarised above. There is a good level of analysis, and useful conclusions are drawn on student intentions and outcomes. Specific goals were set in late 2016 to enhance the value of future surveys, particularly those relating to the higher-level programmes.

Around 6 per cent of level 7 graduates have progressed to further study according to the most recent data gathered. In one recent example, a Chinese graduate interviewed by the evaluators had progressed to Massey University and had received credit towards a portion of their computing degree. This shows a negotiated academic pathway operating successfully.

Royal Business College is establishing industry advisory forums to further connect their programmes with industry. Along with the survey of employers, this has the

potential to deepen the PTE's understanding of the value of outcomes for industry and graduates.

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

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**.

Royal Business College is developing new programmes to replace some expiring National qualifications. This shows responsiveness to the outcomes of the mandatory review of qualifications. The PTE's own reviews and NZQA monitors' findings are also a factor. Suitable internal and external resources and personnel are being deployed to accomplish this work. In general, programme design and delivery is appropriate, although there are areas needing improvement as highlighted throughout this report, in particular in Findings 1.1. The quality of assessment in some programmes is not matching NZQA requirements.

Many of the areas that have required strengthening – either arising from NZQA findings or the PTE's own reviews – are fundamental educational practices.⁶ Minimum expectations and requirements are being met, but self-assessment has been inconsistent and too reliant on external scrutiny to identify fundamental deficiencies. This is changing, but the consistent use and understanding of expected academic quality practices needs to improve across the organisation.

The PTE has processes for monitoring and developing teacher performance, and the new Auckland manager has experience in facilitating teaching and research capability and has begun to implement new strategies. On the whole, the teachers are very well qualified in their subjects and are supported to undertake relevant professional development.

Students are provided with ongoing and timely feedback to enable their progress. For example, in the business management programme a teacher analysed student submissions and provided written feedback to help everyone improve their understanding around assignment requirements. Less favourably, student improvement plans written by the tutors in Christchurch had high-level goals that were not linked to achievable aims, and had no evidence of follow-up or a progress timeline.

⁶ For example, these have included aspects of: internal and external moderation policy; a programme assessment and review policy; a programme review template and report format (source: external review report for the Diploma in Business Management).

Students are given formative feedback on their first submission of an assignment. Samples of this feedback did not indicate that excessive coaching is occurring. Management should monitor this very closely, particularly given that at least some teachers have an '80+ per cent' pass rate goal as part of their performance agreement. More broadly, the evaluators agree with the NZQA monitor's statement that Royal Business College should 'limit the number of resubmissions and resits across [programmes], and limit the number of resubmissions/resits per assessment to one'.⁷ The current work to phase out competency-based assessment and implement grade-based marking in some programmes is a positive step. This will allow teachers to assign marks according to the quality of work presented at the first hand-in. Royal Business College explained during the EER that grade-based marking is being systematically introduced for higher-level programmes, starting with the three level 7 programmes.

While useful innovations and changes are being made ('flipped classrooms', more library resources, professionally prepared case studies, and the information technology innovation laboratory in Auckland, for example), the monitors' reports highlight a range of areas where the delivery of the core curriculum has been variable. Rectifying this must occur (and is occurring). Samples of marking from the Auckland site did not provide assurance that the improvements being sought by management have been consistently embedded.

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

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

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

Students at Royal Business College say they are well supported and that the college has a range of processes and activities that help them succeed. Student-to-student networks also assist with part-time employment, accommodation and social outings. Processes for ensuring attendance and assessment hand-in dates are stringently monitored.

Royal Business College conducts regular surveys of students and graduates. However, recently there has been a dramatic decrease in student numbers. Given these changing circumstances and student population, survey results for different periods may not be comparable. There is considerable over-capacity in rooms and facilities for example, but also loss of some teaching staff. Nevertheless, for illustration, in 2016 Christchurch students were asked to identify how Royal

⁷ Source: Diploma in Information Technology (Level 7) monitor's report, March 2017.

Business College could improve its services for students.⁸ Forty-four per cent of the students said they would like to see improvements to the library, internet and cafeteria services; 17 per cent of students sought a reduction in timetabled days from five to three; 11 per cent sought more student car parking. Twenty-eight per cent of students did not suggest any changes. In response, management has since made additional investment, for example in making commercial e-library resources available to all students.

Auckland students are now helped to join the Auckland Public Library. On both campuses, virtual library resources have been boosted. Graduates from Auckland campus told the evaluators they were satisfied with the support they had received. However, students at that campus said the concerns they raised about cleaning services were resolved 'very slowly'.

Royal Business College maintains close relationships with local migrant settlement groups and religious communities. These active links contribute substantially to students' social and cultural networks, and at times assist with finding part-time employment and accommodation, particularly in Christchurch.

The initiatives around maximising the value of students' self-directed study and monitoring this are positive and well received by students. The PTE provides opportunities for extension activities and topics that may be outside core course content but add value by encouraging students to be more involved in their learning. Information technology programme leaders in Auckland presented a student-led innovation laboratory which, although at an early stage, is a good example of learners applying their knowledge and skills in new contexts.

1.5 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 **Good**.

There have been gaps in the robustness of oversight of some fundamental academic policies. Self-assessment has not been sufficiently comprehensive to identify weaknesses in some academic areas, and in that light has been ineffective. Until recently, findings were not convincingly being used to make necessary improvements. Rather, many of the most important improvements have been prompted by external reviews. Royal Business College may have pursued a 'deliberate growth strategy'⁹, but this has not been matched by a consistent

⁸ Source: Exit Survey Report for Christchurch Campus 2016; 250 respondents.

⁹ Royal Business College self-assessment summary report 2017 p.3.

attention to academic quality. The PTE is now rectifying this, and a more critical and in-depth review has occurred over the past 12 months or so. A suite of internal review and action reports document and reflect understanding of the key issues and progress on improvements.

Following consideration of findings and recommendations contained in the 2016 NZQA monitor's report, Royal Business College developed an action plan, including internal and external reviews. There has been a similar response to the results of NZQA monitoring. Along with the principal's needs analysis review of the PTE's operations, and the 2017 quality improvement plan, these are credible and useful examples of self-assessment. Numerous changes have occurred as a result of this work. Policies and procedures have been rewritten and made known to staff, including the importance of the quality management system. Internal monitoring and reporting have also been improved. The PTE has ensured assessment is fit for purpose, that pre- and post-moderation is occurring, and that the overall quality of teaching is monitored and improved. However, the extent to which this work has led to demonstrable, embedded improvement is still somewhat limited, and this is reflected in the statements of confidence. There are also areas for further consideration by management included as recommendations below.

Immigration New Zealand and NZQA concerns about high visa decline rates for applicants in India have been mitigated by the PTE's decision to temporarily cease recruiting in that market. However, given Royal Business College's past reliance on this market, and management's evaluation of agents there indicating an intention to resume recruitment, it cannot be said that this matter has been fully resolved. This issue is not confined to Royal Business College.

1.6 How effectively are important compliance accountabilities managed?

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**.

Royal Business College's compliance accountabilities are now being better managed. There is a determined effort to strengthen numerous aspects of academic quality and overall leadership. The development and use of a compliance checklist in 2017 has given renewed focus to this area. This is also apparent in managing compliance with NZQA, the TEC and Immigration New Zealand requirements, as below:

- The PTE has applied to NZQA for new site approval and a programme change to ensure that delivery is congruent with approval.¹⁰ Both applications were approved.
- The PTE has established new academic leadership roles with a brief to ensure programme quality and policy adherence across sites, and to build staff competence more generally. Fit and proper person declarations have been submitted to NZQA in a timely fashion.
- Immigration New Zealand reportedly visited Royal Business College within the six months prior to the EER visit, but no written information was available for the evaluators regarding those visits. Email correspondence shows that the PTE is working with Immigration New Zealand to identify suitable, reliable agents in India. According to NZQA information, Immigration New Zealand visited the Te Puke campus in July 2016 and confirmed that students were attending as timetabled.
- Student attendance is monitored and recorded. Students receive up to three warning letters if they are absent without reason. Students whose attendance falls below 80 per cent may be required to withdraw from their programme. Examples of this occurring recently were sighted.
- Samples of student files selected at random and appraised by the evaluators indicated good record-keeping and compliance in entry and enrolment, visas, insurance and associated records. Similar checks by the diploma monitors in December 2016 found that student files 'were very tidy and the standard of documentation was excellent. All student files showed evidence of IELTS testing to meet the English language criteria stipulated under Rule 18'.
- The evaluators also observed that the PTE has declined to accept locally enrolling international students who may not be meeting either their visa requirements or English language testing requirements set by NZQA.
- All actions stemming from the TEC audit of Royal Business College in May 2017 have been closed off.

¹⁰ 'In 2016 NZQA raised the concern that Royal Business College should have applied for a Type 2 change when ... Module MAR8082 [was substituted] with the...HRM7010. As a result of this concern and other concerns associated with the programme NZQA required Royal Business College to conduct a full programme review and depending on the magnitude of changes that were identified by the programme review as being necessary, to then submit a Type 2 change or apply for approval and accreditation for a new programme.' Source: NZQA programme change information.

Focus Areas

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

2.1 Focus area: Royal Business College Diploma in Business Management (Level 7)

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

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

2.2 Focus area: National Diploma in Business (Level 6)

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

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

2.3 Focus area: International Students: Support and Wellbeing

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

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

This focus area examined how effectively the PTE is discharging its pastoral care responsibilities towards its international students. At its current scale of operation, Royal Business College has the staffing, systems, facilities and collective understanding to ensure a suitable level of support. The approach taken towards monitoring the PTE's compliance with and annual review of the Code of Practice is generally suitable. However, although no particular gaps or concerns were noted, there was limited evidence presented in the PTE's self-assessment material or by other means of enquiry to show how it comprehensively meets the intended outcomes of the revised code.

Recommendations

NZQA recommends that Royal Business College:

- Consider instituting a planned, annual cycle of audits of compliance with the policies and procedures in the PTE's quality management system. This is because policies are being renewed and changed, the PTE has more than one site, and this would be one check on staff understanding of and adherence to stated policy.
- Consider ways in which student feedback gained through surveys could be more explicitly used to monitor or even lead changes to the curriculum, assessment tasks and the like.
- Ensure that the revised Royal Business College Policy 3.12 Code of Practice Annual Review Policy in relation to the Education (Pastoral Care of International Students) Code of Practice adequately reflects the outcomes-based focus of the new guidelines.
- Ensure that staff training in assessment and moderation extends well beyond short courses designed around competency-based assessment, and has a focus on fair, valid and reliable assessment for other assessment types.

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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