

# Report of External Evaluation and Review

## Nelson Marlborough Institute of Technology

Highly Confident in educational performance Confident in capability in self-assessment

Date of report: 27 February 2013

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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:	Nelson Marlborough Institute of Technology (NMIT)		
Туре:	Institute of Technology		
Location:	322 Hardy St, Nelson		
Delivery sites:	390 Lower Queen Street, Richmond, Nelson		
	85 Budge St, Blenheim, Marlborough		
	RNZAF Base, Woodbourne, Marlborough		
Number of students:	Domestic: 2,499 equivalent full-time students (2011). Thirteen per cent of enrolled domestic students were Māori, 4 per cent were Pasifika, and 46 per cent were aged under 25 years.		
	International: 299 equivalent full-time students (2011)		
	International delivered overseas: 360 equivalent full-time students (2011)		
Number of staff:	209 full-time equivalents		
Distinctive characteristics:	NMIT serves the Nelson Marlborough region, which has one of the lowest population densities in the country.		
	The organisation has a significant number of collaborative arrangements and partnerships with other providers including:		
	<ul> <li>CPIT (Christchurch Polytechnic Institute of Technology) – for the delivery of the</li> </ul>		

Diploma in Tertiary Learning and Teaching and the Bachelor of Nursing at NMIT

- Wintec (Waikato Institute of Technology) through the Bachelor of Applied Social Sciences owned by Wintec, delivered by NMIT on the Nelson campus
- Skills Update Training Institute partnership to deliver the National Certificate in Retail (Levels 2 and 3), Certificate in Computer Technology (Levels 2 and 3), Diploma in Career Guidance, Certificate in Community Support Services (Care for the Older Person)
- Department of Conservation to deliver the Trainee Ranger Certificate
- AUT University the Bachelor of Sport and Recreation is available at NMIT's Nelson campus
- Open Polytechnic partnership to deliver the Bachelor of Teaching (Early Childhood Education)
- Recent significant changes: A review of management roles and a crossinstitution management restructure took place in 2011. As a result, all academic programmes were restructured around two groups, Regional Economic Development and Community Support and Service Industries. Under these broad divisions there are 10 programme areas.

Previous quality assurance The 2010 ITPQ Mid-Term Quality Review history: acknowledged the progress that had been made with NMIT's development of its quality management system, following a low-risk noncompliance identified in the 2008 ITPQ Academic Quality Audit.

> At this same review, the ITPQ auditors found that NMIT was 'using effective self-assessment and review processes to help maintain quality consistent with its Quality Assured Status'.

## 2. Scope of external evaluation and review

Programmes for evaluation were chosen in consultation with the NMIT directorate and were drawn from a number of levels, from certificates to degrees, being representative of NMIT's programme clusters and campuses, retention and completion characteristics and, overall, representing a significant proportion of the polytechnic's equivalent full-time students (EFTS).

Programme	2011 EFTS	Location	Notes
Certificate in Community Support Services (Level 4)	85	Marlborough Richmond	Delivered in partnership with Skills Update Training Institute. This is a self- paced blended learning programme taught across campuses.
Creative Arts Cluster:	158	Nelson	These programmes range
Certificate in Arts and Media (Level 4)			from level 4 to level 7, from certificate programmes to a
Certificate in Arts and Media (Contemporary Music) (Level 4)			degree. The programmes are all taught on campus in Nelson. A number of students progress through
Diploma in Arts and Media (Contemporary Music) (Level 5)			the different levels.
Diploma in Arts and Media (Graphics and Multimedia) (Level 5)			
Diploma in Arts and Media) (Visual Arts and Design) (Level 5)			
Diploma in Arts and Media (Graphics and Multimedia) (Level 6)			
Diploma in Arts and Media (Visual Arts and Design) (Level 6)			
Bachelor of Arts and Media (Visual Arts and Design)			

Business Admin Cluster: Certificate in Business Administration (Level 2) Certificate in Business Administration (Level 3) Certificate in Business Administration (Level 4) National Diploma in Business Administration (Level 5)	74	Nelson and Marlborough	These programmes are taught across the campuses at Nelson and Marlborough. The programmes have high rates of Māori compared with other NMIT programmes. A number of learners progress through the different levels.
Diploma in Information Technology (Level 6)	53	China	This diploma is delivered in China in collaboration with Zhejiang Water Conservancy and Hydropower College. As this programme is delivered in China, the evaluation team did not speak with the currently enrolled students from this programme or the China-based tutors. A small number of graduates from this programme were interviewed.
Bachelor of Information Technology (Level 7)		Nelson	This degree programme has a high number of international students enrolled.
Diploma in Viticulture and Wine Production (Level 5)	30	Marlborough and online	This programme has mixed modes of delivery and is based in Marlborough. The programme has an articulation agreement with Lincoln University for the Bachelor of Viticulture and Oenology.
Certificate in Professional Hairdressing (Level 3)	39	Nelson and Marlborough	This programme is taught across two campuses and has high numbers of youth and Māori enrolled.
Certificate in Aeronautical Engineering Fundamentals (Level 3) Certificate in Aeronautical Maintenance Engineering (Level 4)	62	Woodbourne	This programme is taught on the RNZAF base at Woodbourne. It attracts a high number of young learners.

In addition to these programme focus areas, the mandatory focus area of governance, management, and strategy was also included, as was student support, including achievement and support for 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.

The external evaluation and review was conducted by a team of four evaluators over a five-day period (29 October-2 November 2012). For each programme focus area, a series of discussions was conducted with programme management, academic staff, students, and industry advisory groups. The evaluation team travelled to Marlborough and interviewed students, staff, and advisory groups. Meetings were also held with international student support staff and international students and student association representatives. For the governance, management, and strategy focus area, meetings were held with the chief executive, the directorate, the academic board, and four members of Council. Documentation reviewed included the self-assessment review reports from the programme focus areas, key strategy and research documents, student and graduate surveys, and reports to the academic board and Council.

## Summary of Results

## Statement of confidence on educational performance

NZQA is **Highly Confident** in the educational performance of **Nelson Marlborough Institute of Technology.** 

Learners at NMIT are gaining useful skills and knowledge that support them to find employment. Across the organisation, the evaluation team saw evidence that learners were developing industry-specific skills useful for employment. For example, in a recent graduate destination survey, over 90 per cent of respondents considered that their programme 'helped me to realise the goals that I set when I first enrolled', and 90 per cent would recommend the programme to others. Seventy-four per cent of the graduates surveyed were employed and 76 per cent of these stated that their qualification was either partly or highly relevant to their work. This data was corroborated by meeting minutes and interviews with the different advisory groups and signals that the programmes delivered by NMIT are valued by graduates and employers.

NMIT has strong networks in the Nelson Marlborough community and actively seeks to match local needs. The programmes intentionally target local industries, including viticulture and oenology, aquaculture, horticulture, conservation, tourism, information technology, and the creative industries. Industry is directly connected to the programme offerings through both formal and informal mechanisms, ensuring currency and relevancy and, in many programmes, appropriate work experience opportunities. Collaborations with a wide range of organisations, including the RNZAF at Woodbourne and the Cawthron Institute in Nelson, enhance NMIT's ability to deliver valued training.

NMIT has adopted a range of approaches to engage with key community stakeholders. For example, a targeted strategy to engage with Nelson and Marlborough youth has resulted in a significant increase in local school leavers choosing to study at the institute, from 16.5 per cent of the student body in 2005 to 25 per cent in 2011. A Strategic Foresight Project has connected with a wide range of stakeholders in planning for the future. This project has enabled the organisation to survey current and future needs of stakeholders and is informing planning. While there is still work to be done, considerable progress has been made to set up Te Kaunihera Iwi Māori, NMIT's Māori advisory committee, and to meaningfully engage with the nine iwi in the region. These different approaches have all been effective in ensuring that community aspirations and needs are listened to and well understood, and there is good evidence that these perspectives are used for organisation-wide planning and development.

The Tertiary Education Commission's (TEC) educational performance indicators support a strong performance by NMIT, particularly for some at-risk groups. Course and qualification achievement has been steadily increasing at NMIT, in line with sector medians. Course completion and qualification completion rates for 2011 were at 79 per cent and 64 per cent respectively. These rates have improved since 2009, when course and qualification achievement rates at NMIT were at 68 and 51 per cent. For 2011, NMIT's course and qualification completions for Youth Guarantee-funded students were 78 and 74 per cent respectively. These compare strongly against sector-wide averages of 65 and 54 per cent. At 57 per cent, retention rates sit marginally above the sector average, but compare more favourably at levels 1-4. NMIT also exceeded institute of technology and polytechnic sector averages for Māori qualification achievement. The evaluation team saw good evidence that achievement rates are closely monitored and a range of strategies are being used to target poor performance and lift success rates.

The Learner Journey is a deliberate student engagement strategy which is guiding the organisation's support and development of learners. Key platforms of this strategy include implementing individual learning plans with students, and peer teaching and learning observations. The evaluation team saw how this strategy informed developments at the programme level and heard numerous good examples of how it was having a positive impact on learners and tutors. For example, tutor observations have occurred across the organisation by trained observers, and tutors find the process positive and helpful in their development. Individual learning plans have been implemented across different programme areas. In 2010, only 35 per cent of students at levels 1-3 had an individual learning plan, but in 2011 this rose to 70 per cent. Staff and students indicated that individual learning plans are useful in guiding students through their study. The Learner Journey is a useful framework which is supporting an organisation-wide focus on teaching and learning, and is having an impact on achievement in some programmes. The challenge for NMIT is to see the strategies implemented evenly across the different programme areas.

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

NZQA is **Confident** in the capability in self-assessment of **Nelson Marlborough Institute of Technology.** 

The cornerstone of NMIT's self-assessment is the system of self-assessment reports (SAR) which are generated for every programme and business area, including the directorate, as well as for NMIT overall. The reports are submitted to the quality management team, and programme teams receive feedback on their reports. It was clear that the quality management team is actively seeking to improve staff understanding of evaluative quality assurance and the importance of making evidence-based judgements. For example, there is an annual internal review process that selects a range of programmes and processes for critical review by their peers. SAR reports and supporting evidence are examined through this process. The SAR reports are used by the organisation to understand valued outcomes and achievement and focus on monitoring actions and improvements across the different focus areas. While the SAR reports are annual, there is ongoing monitoring of actions and improvements that result from them.

This process has been evolving over a number of years and changes have been made in response to feedback from staff. In 2011, all programme areas and business units were required to present their SAR to members of the directorate, including the chief executive. In turn, the directorate was required to present its SAR to programme area and business support team leaders. Reports on the discussions, which included judgments on educational performance and capability in self-assessment, were agreed with teams before sharing across the institution. This process was considered by staff to be a constructive one, with programme teams being challenged to defend their judgements and co-constructing final ratings. While some SARs are well evidenced, there is still work to be done to ensure that programmes find points of reference and benchmarking tools to anchor their judgements.

NMIT has a wide range of mechanisms to effectively understand the needs of its key stakeholders. For learners, there are institute-wide surveys, including a First Impressions Survey and a Learner Experience Survey. Programmes also administer course and tutor evaluations. Participation in graduate surveys in 2011 and 2012 and the AUSSE survey also provides NMIT with useful data. The evaluation team saw strong evidence that these mechanisms are used to guide and monitor improvements, for example ongoing improvements to the orientation programme for new students.

A contractual arrangement with the students association (SANITI) ensures that students are represented at a number of NMIT meetings, including those of the academic board and Council. Student representatives from different programmes are active in bringing issues to the attention of the organisation. Focus groups have also been used on occasion, for example in gauging the experiences of international students. Different programme SARs have documented the move to reinvigorate programme advisory committees to make their representation meaningful. Across most of the focus areas, these advisory committees were active and engaged in shaping the curriculum and delivery of the programmes. Staff generally feel they have a voice, and for some the SAR is their opportunity to give feedback. Improved internal communication and staff forums help to enable the flow of information.

Transparency in the information available to all staff across the programmes has supported improved self-assessment. For example, an intranet site contains all the educational performance indicator data that can be analysed by cohort, programme, and over time. In addition, all the programme area SARs are available, as are the actions derived from the SAR and the progress that has been made against the action points. There have also been improvements to the student management systems for monitoring attendance and course completion. These changes allow tutors and programme leaders to be more responsive to issues as they occur.

The improvements to the self-assessment process were just one example among many that the evaluation team saw of evidence-based reflection leading to quality improvements. Other examples include the reinvigoration of the advisory committees and better information available to students on enrolment. It is evident that the SAR process is used by all staff to reflect on their performance as part of a team. However, while many teams had good information and evidence on which to base their conclusions, a few teams were still basing their judgements on information that was unsystematically collected and unsubstantiated. However, these gaps are recognised by the quality management team, and the evaluation team is confident that the 2012 organisation-wide SAR will show improvements.

## Findings<sup>1</sup>

#### 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.

Learners at NMIT achieve well. Course completion and gualification completion rates for 2011 were on a par with the sector medians, at 79 per cent and 64 per cent respectively. These rates have improved since 2009, when course and qualification achievement rates at NMIT were 68 and 51 per cent. For some priority groups, NMIT performs particularly strongly. For example, Youth Guaranteefunded students' course and qualification completions were 78 and 74 per cent respectively. These results compare well with sector-wide averages of 65 and 54 per cent. NMIT also exceeded institute of technology and polytechnic sector averages of 70 and 54 per cent for Maori course and gualification achievements. which at NMIT are 71 and 66 per cent. NMIT was above the sector averages for course completions for students aged under 25 years, but slightly lower for qualification completions. For the small number of Pasifika students (4 per cent of NMIT's students), achievement rates were below sector averages and NMIT targets, particularly at levels 4 and above. International students achieve at a higher rate compared with domestic learners, with 82 per cent course completion and almost 100 per cent qualification achievement for 2011.

Across the focus areas, the evaluation team saw evidence that learners are gaining technical and work-ready skills useful to future employment. The Learner Experience Survey indicates that students believe they are achieving important core skills. For example, 87 per cent believed their progress was good or outstanding for 'willingness to learn', 79.6 per cent rated their progress good or outstanding for 'team work skills', and the rates for 'oral communication skills' and 'written communication skills' were 78.1 and 76.4 per cent respectively. These student perceptions are supported by feedback from the advisory boards, which noted the relevance of the skills being achieved by the learners. Graduates also reflect on their qualifications: 91.9 per cent of the respondents to the graduate survey in 2012 believed they 'learned to apply skills and knowledge from my programme to new situations', and 90.3 per cent stated that 'the programme equipped me with the skills to undertake further learning'. Across a number of focus areas, the evaluation team heard from employers that learners were graduating from NMIT with these important attributes.

Achievement in the programme areas is being closely monitored, with at-risk learners identified early and support put in place to enable them to succeed. Most

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

programmes have a good understanding of how their achievement rates are tracking, and a few had useful benchmarking tools for comparison with similar programmes taught at other polytechnics. Mechanisms for tracking achievement in sub-contracted programmes are still improving. Across the programmes, withdrawing students are followed up with an exit survey to determine their reasons for departing. For those surveyed in the first semester of 2012, 68 per cent said there was nothing NMIT could have done to prevent their withdrawal. Financial issues and distance learning issues were noted as key reasons. At an organisational level, the tools available to programme leaders, administrators, and managers have improved the ability to monitor and understand achievement, with internal and longitudinal benchmarking data being more readily accessible. Programmes that are causing concern because of low student numbers or educational achievement are closely analysed by the quality management team and quality committee, a sub-committee of the academic board. Continued professional development will ensure student management system tools are fully utilised at the programme level.

## 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 Excellent.

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

A range of evidence exists, including graduate surveys, information from advisory groups, and employer links at the programme level, to assure the evaluation team that NMIT is gaining excellent outcomes for key stakeholders. The graduate surveys from 2011-2012 indicate a high level of support for the organisation and the value the graduates place on their training. From the 2011 graduate destination survey, 90 per cent of graduates said they would recommend the programme to others and that they felt their study offered a good investment in time and money. From that same survey, 70.2 per cent said their qualification aided them in their search for work. In the 2012 survey, 93.1 per cent agreed or tended to agree that they considered what they learned to be valuable for their future; 72.7 per cent of graduates surveyed in 2011 were either in work or were self-employed or contracting, and this rate was higher than for graduates from other polytechnics surveyed. For graduates surveyed in 2012, this rate was 74.3 per cent.

In support of the survey data, the evaluation team heard from across the programme advisory groups about the value they placed on the qualifications being taught. In some industries, such as viticulture and wine-making in Marlborough, a significant number of local vineyards and wineries employ NMIT graduates, who appreciate the work-ready skills and the opportunities for on-job training. Links with industry are strong in the business administration programmes, with an employment scholarship programme having been sponsored successfully by local employers for a number of years. Sponsorship and work experience opportunities are also provided by the information technology industry for NMIT students. Local

aged care facilities increasingly require staff to hold qualifications to ensure quality care, and the managers of those organisations value highly the community support services qualification, which is offered in partnership with Skills Update Training Institute (SUTI). Most programmes are tracking graduates, and significant numbers are moving either to relevant employment or further study, although this information is only just beginning to be systematically collected at the programme level. Online social networking tools such as LinkedIn and Facebook are increasingly being used to stay in touch with graduates. In some programmes, it was evident that the links with graduates were significant for informing programme reviews and ensuring programmes remain current and relevant.

NMIT is a community-facing organisation and has made improvements to how it engages with different sectors. Relationships with the nine local iwi are developing and there is a commitment at the Council and directorate level to further the delivery of valued outcomes for Maori. A deliberate strategy to engage with youth in the community has been of value through the collaborative development of a trades academy, for which NMIT is the lead provider, and the offering of scholarships for youth to supplement Youth Guarantee funding. Curriculum alignment work is working to ensure that students have a seamless transition into NMIT programmes. NMIT values its collaborative agreements with industry and other education providers, including the development of a new aquaculture technical facility in collaboration with the Cawthron Institute. The Department of Conservation has an ongoing relationship with NMIT to train park rangers through its heavily oversubscribed trainee ranger certificate programme. For the viticulture students. NMIT has recently renewed a memorandum of understanding with Lincoln University to enable NMIT students to staircase to the third year of Lincoln's degree programme, which is jointly taught in Marlborough. Two-thirds of 2011 graduates took up this opportunity. A revised research strategy has determined that staff at NMIT should focus on applied research and knowledge exchange that is readily applicable to social and economic development in the region.

There is good evidence that graduates and employers value the qualifications and learning they achieve with NMIT. Furthermore, NMIT is of value to local industry in delivering training that gives graduates currently relevant skills, and provides value to the wider community by strengthening pathways for learners from school and into work. Through the SAR it is clear that NMIT staff understand the need to monitor the value of outcomes for their programmes, and processes to ensure they can systematically gather evidence are improving.

## 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 Good.

NMIT is working hard to match the variety of needs of its learners and other key stakeholders. The recent programme restructure has focused the organisation and the programmes it offers on two key areas: regional economic development and community support and service industries. The addition of a new aquaculture programme and the development of the aquaculture technical facility in collaboration with the Cawthron Institute are examples of responsiveness to industry. It was clear, through the focus area SARs, that NMIT has been working hard to reinvigorate the industry advisory groups and ensure they have meaningful input into the way programmes are developed and delivered. Across a number of programme areas, these groups are directly involved in supporting programme teams, providing an industry voice to ensure their needs are being matched. While developments have been encouraging, NMIT recognises that there are still regional learning needs that it has yet to meet. The recent Strategic Foresight Initiative is a future-focused exercise which has engaged staff and industry and the wider community in planning for the future. The development of a model of 'entrepreneurial learning', which aims to break down the separation between education, practice, and work, is signalled in the new investment plan. The decision to join, as a founding partner, the Open Educational Resource University project, with New Zealand partners Otago Polytechnic, the University of Canterbury, the Open Polytechnic, and Northtec, is an example of a future-focused strategy.

NMIT is deliberately collaborative and has a number of collaborative arrangements with organisations to expand learning opportunities. Examples include the aforementioned arrangement for viticulture students to progress to the Lincoln University degree, and similar arrangements are in place for students studying counselling and social work, education and teaching, and sports and recreation. For students who want to engage in vocational programmes at levels 2 and 3, NMIT has arrangements with SUTI, which delivers a number of programmes on NMIT's behalf. Learners spoken to by the evaluation team value the opportunities that these collaborations provide. However, it was of some concern to the evaluation team that the mechanisms for ensuring learner needs were being matched were not as comprehensive in the SUTI programme as compared with other NMIT programmes evaluated.

Management of the separate campuses appears to be mostly well done, with improvements to video-conferencing facilities and access to student support ensuring that Blenheim students' needs are matched.

Generally, NMIT has good systems for ensuring that the organisation understands the needs of its learners. The organisation conducts regular First Impressions and Learner Experience Surveys. In addition, tutor and course evaluations are conducted by the various programme and student support areas. There is also a student representative programme coordinated by SANITI operating effectively across a number of programmes. The evaluation team heard a range of examples of how NMIT responds to student feedback. One example included improving the information and advice given to learners on enrolment. The number of students who rated this advice as 'good' or 'outstanding' increased from 45 per cent in 2011 to 84 per cent in 2012. Another example is after-hours access to the Fishbowl computer café, implemented after requests from students. The wider use of the TEC's online adult literacy and numeracy tool, to ensure that these needs are understood, is a positive development, although more professional development is required in some programme areas to ensure the students understand the information and know how to respond. This issue has been identified by the Learner Journey team and a learning plan has been developed. The move to online and blended learning has started to gain some traction, and the newly created flexible learning technologies team is making good progress in some programmes. Of note has been the shift to blended learning in the Diploma in Viticulture and Wine Production, which has resulted in the programme matching the needs not only of those who are studying part-time while in employment, but also those studying on campus.

There has been some progress made to engage with Nelson Marlborough iwi, although the organisation still has a lot of work to do to ensure Māori are enabled to succeed 'as Māori', and that programmes are delivered in a way that matches iwi aspirations. However, some beginning initiatives include some course delivery on marae and a strategy to lift cultural awareness, cultural content, and Māori visibility on campus, and a commitment to change by the Council and management and iwi.

#### 1.4 How effective is the teaching?

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

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

The evaluation team was impressed by some excellent teaching practice in a number of programmes that were part of the scope of the external evaluation and review. Across a number of focus areas, learners indicated that the learning environment is positive, constructive, and caring and that the tutors are fully focused on ensuring that learners achieve. This supports the finding that nearly 85 per cent of respondents to the 2011 Learner Experience Survey rated the teaching as either 'good' or 'outstanding', and 96 per cent of the First Impressions Survey respondents said their tutors were approachable. Strategies to engage learners include guided work placement opportunities, online learning options, capstone projects, exhibitions and performances, and purpose-built facilities.

NMIT supports the development of good teaching, and the Learner Journey strategy, Te Ara a Tawhaki, is at the centre of this. For example, a 'programme learning and teaching observations' (PLATO) programme has been used across the organisation to improve teaching and learning, and feedback from tutors

indicates that this has been instrumental in encouraging reflective practice and is therefore a useful strategy for improvement. Trained observers give useful feedback to tutors and lecturers, which is incorporated into future teaching delivery. This observation programme is not only useful for professional development, but also to give the organisation a good understanding of what is happening in the classroom. Over the whole institute in 2011, 75 per cent of observations were 'good' or 'outstanding', an increase from 50 per cent in 2010. It is unfortunate that these observations were not extended into SUTI-run programmes, as quality issues were identified by the evaluation team, although it is planned to extend PLATO to SUTI-run courses from 2012. Good practice is being shared across teaching teams, with an example of blended learning expertise being used to support one programme, and the experience shared more widely. Learner Journey professional development is undertaken through workshops where staff are invited to share good practice. The hosting of the National Teaching and Learning Conference at NMIT in 2011 and 2012, with 23 presentations by NMIT staff, indicates an institutional commitment to teaching for learning.

Across the focus areas generally, teaching staff are engaged in moderation, with internal moderation processes occurring systematically and regular external moderation of programmes and assessments. For some programmes, external assessors are regularly used to ensure comparability with the tertiary sector. A series of moderation workshops was held to support staff to understand the importance of robust moderation processes. National external moderation results for 2011 show that NMIT met the standard for eight out of the 11 units submitted, with one requiring modification. The evaluation team heard numerous examples of assessment being used for learning, with useful feedback being given and learners having a good understanding of the learning outcomes they were trying to achieve. Literacy and numeracy has been a focus for some learning support staff and programmes, although more work needs to be done to see it embedded across all programmes where there is a need.

The lesson observations are used alongside tutor and course evaluations, the institute surveys, and student representative and performance appraisals to ensure the organisation has a range of ways of ensuring that teaching and learning are effective. Achievement is also closely monitored, and programmes that are not performing well are analysed to see how achievement can be improved.

#### 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.

The Learner Journey strategy has 'knowing the learner' as one of its key platforms. This platform supports a number of initiatives, including initial and diagnostic assessments, appropriate guidance and support, effective induction, individual learning plans, and added support for Māori and Pasifika learners. It is evident that the Learner Journey platform has gained traction across the organisation and is ensuring that learners are well guided and supported. Individual learning plans are increasingly being put in place for learners across the organisation, although programmes have at times struggled to make the generic template applicable to their context. As a result, programme areas are being encouraged to implement the Learner Journey strategy in ways that are meaningful to the particular area, and some alternative methods have been successfully implemented, such as the Learning Coach model in the business administration programme.

Appropriate guidance and support for enrolling students has also been an area for improvement, including professional development for staff; as noted above, respondents to the 2012 First Impressions Survey were a lot more satisfied with this aspect than respondents in 2011. For the programmes supported by the Learner Journey team, there is good use of initial diagnostic assessment to ensure appropriate support is in place. The challenge for the institute is to build comparable capability within the programme teaching teams.

The evaluation team saw excellent examples of student induction, including a 'challenge week' run by the information technology team. It appears that the quality of induction and orientation is improving, even if the 'reach' has not. In 2011, 55 per cent of respondents rated their induction as 'good' or 'excellent', and this shifted to 70 per cent for 2012. However, in 2011 and 2012, 25 and 23 per cent stated that they 'didn't know', or 'didn't attend' an induction.

Student support services and the Learner Journey team have recently been combined, and this new team is working to better integrate its services. The library has been redeveloped as a 'centre of learning', where the Learner Journey support team is based. This team has reviewed and improved the range of mechanisms it uses to measure its effectiveness and, while earlier data is not available, the team sees its progress to date as positive. From student management records and student feedback, the team estimates to have prevented approximately 10 per cent of the learners supported from withdrawing from their programmes. Regular programme representative meetings with SANITI and the Learner Journey manager are an effective way of bringing issues to the student support team.

NMIT has an increasing number of international students, and support is in place for these learners. A 2010 review of the organisation's compliance with the Code of Practice for the Pastoral Care of International Students highlighted some issues for improvement which have been addressed. An issue that arose over poor enrolment information and advice from overseas agents resulted in the team changing the process for sending course information and offers of place. Support is provided specifically for international students, including orientation and accommodation support. International students spoken to said they valued these services and this was supported by evidence from focus group interviews conducted by NMIT. International students in Marlborough have access to study support but miss the extra activities available to those studying on the Nelson campus. Overall, the course and qualification achievement rate for international students is higher than for all students; for 2011 the course completion rate for international students was 82 per cent. The achievement rates of internationals are not being separately analysed by key teams in the organisation. Separate figures are not analysed in the SAR of either the directorate, NMIT overall, or that of the Learner Journey team.

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

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

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

The NMIT Council is actively engaged in the careful management of NMIT resources, while ensuring the continued focus on quality educational outcomes. The organisation has a low risk rating and is positioned well above minimum TEC guidelines on key financial metrics. This strong financial performance has been achieved alongside significant investment in infrastructure, including the remodelling of the library and building the award-winning arts and media building. Members of the Council are representative of the Nelson Marlborough community and strongly representative of local industry. Currently, the Council has no representative with knowledge of educational alignment and a close understanding of the tertiary education sector. The Council has been effective in setting in place a clear vision and direction for the organisation. The strategic foresight initiative is a positive development for focusing on tertiary education needs of the near future.

The 2011 restructure of the organisation towards a focus around two key programme area groups has resulted in a new team of programme area leaders. These new roles are bedding in and staff are gaining programme management experience. As would be expected, there has been some turbulence with the restructure, but it appeared that most staff are satisfied with the new structure. Across a number of the programme teams, staff reported that they were working to implement the numerous strategies as determined by senior management. A number of systems are in place to ensure the staff voice is heard, including staff forums, regular meetings with the Tertiary Education Union representative, and the SAR reports. With few exceptions, staff confirmed that they were consulted on organisational developments and felt their views were heard. A staff climate survey conducted in 2010 is scheduled to be conducted again in 2013.

The Learner Journey has been a positive initiative, endorsed by Council, to ensure a focus on quality teaching and learning and guidance and support. Some of the strategies, for example PLATO, have been well implemented and are showing effectiveness. Other parts are not yet comprehensive across the organisation, including the embedding of literacy and numeracy and support for Māori and Pasifika learners. However, these issues have been highlighted in various SARs and actions have been set to address them. The self-assessment process that has been implemented across the organisation is working well for focusing the programme teams in terms of achievement, outcomes, and quality teaching and learning processes, and ensuring the teams have good evidence and information to enable them to evaluate their relative success and areas warranting improvement. The involvement of most of the staff in the process is encouraging, and the feedback from teams is positive. Better performance data has been made available and transparent to all. The quality and robustness of evidence is improving. Actions that fall out of the SARs are tracked for progress, and this tracking ensures that the issues stay on people's agenda. Most programmes are reviewing the effectiveness of their actions, although this could be more widespread. The use of benchmarking is limited to a few programmes; most SARs would benefit from including comparisons with similar programmes elsewhere, rather than being solely focused on meeting or exceeding internal NMIT targets. The highly collaborative nature that is a feature of NMIT's operations is a strength but could also be considered a risk. NMIT is a member of TANZ (Tertiary Accord of New Zealand), and the evaluation team heard multiple examples of how this collaboration is strengthening programmes and delivery. The collaboration with other organisations to deliver programmes appears to be mostly well managed and enables NMIT to deliver a wider range of programmes than it otherwise would. Programmes delivered in partnership with NMIT report performance data and complete SARs; however, other checks and balances, including lesson observations and support from the Learner Journey team, could ensure that quality issues are not being missed.

## 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 **Excellent**. The rating for capability in self-assessment for this focus area is **Excellent**. For information on this focus area see 1.6 above.

2.2 Focus area: Student support including international studentsThe rating in this focus area for educational performance is Good.The rating for capability in self-assessment for this focus area is Good.For information on this focus area see 1.5 above.

2.3 Focus area: Certificate in Community Support Services (Level 4) The rating in this focus area for educational performance is **Poor.** 

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

Course completion rates and qualification rates for this programme for 2011 are 66 and 63 per cent respectively. These rates are significantly better than those of the 2010 cohorts, for whom the course completion rate was 58 per cent and the qualification completion rate was 41 per cent. Both 2010 and 2011 rates are lower than those for 2008 and 2009, when achievement rates were above 70 per cent. While individual learner achievement is being closely tracked, the rates of achievement are not being benchmarked with other similar programmes, so it is difficult to know how this programme compares. Learners and members of the advisory group told the evaluation team that students were learning important work-relevant skills, including time management and patient advocacy. Stakeholder feedback indicates that this programme is valued by employers who are increasingly demanding workers who hold qualifications. They perceive that graduates are better equipped to perform their roles with the knowledge and skills learned through the programme.

While this programme, which is delivered by SUTI, has value, it is not matching the needs of learners well. The programme is designed to be delivered at a distance for learners who are working in community care settings so that the practical aspects can be practised and assessed authentically. Currently, about 30 per cent of learners are not in either employment or voluntary work, and the work

placements, required for assessing key learning outcomes, are not being well managed. The workbooks given to learners are not designed to support those with literacy issues, and some are confusing and difficult to follow. SUTI had received feedback about this, but little action appears to have been taken. While literacy issues exist for a significant number of learners, the programme does not have these skills embedded. NMIT administered the TEC online literacy and numeracy tool and tutors were given professional development to understand the data and use it to inform their support for learners.

Students engage well with their facilitators and find they 'go the extra mile' to support learner achievement. However, the facilitators are isolated and unsupported; the lack of professional development means they do not get the opportunity to meet regularly and share good practice, despite this being a designated action resulting from a previous self-assessment. While moderation is occurring, it does not appear to be improving assessment. The evaluation team had significant concerns with regard to some examples of assessment practice.

Students get one-to-one support from their facilitators and value this time. However, this programme is not well linked with the Learner Journey team and students reported that they have at times not been successful in accessing support.

It is clear that NMIT's self-assessment processes have picked up many of the issues that exist with this programme; however, recommendations for improvement require more input from the programme manager and SUTI. The length of time that these issues have existed does give cause for concern over the speed with which quality improvements can be made in this particular partnership arrangement.

#### 2.4 Focus area: Creative Arts Cluster

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

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

Table 1: 2011 EFTS, course completion and qualification completion rates for programmes in the creative arts cluster with more than five EFTS			
	EFTS	Course completion (%)	Qualification completion (%)
Certificate in Arts and Media (Level 4)	22	59	40
Certificate in Arts and Media (Contemporary Music) (Level 4)	15	83	76
Diploma in Arts and Media (Contemporary Music) (Level 5)	17	74	82
Diploma in Arts and Media (Graphics and Multimedia) (Level 5)	7	86	86
Diploma in Arts and Media (Visual Arts and Design) (Level 5)	13	83	69
Bachelor of Arts and Media (Visual Arts and Design)	71	89	97

The creative arts cluster is made up of a number of programmes ranging from two level 4 certificates to a degree programme. The programmes are clustered around different areas of speciality, including graphics and media, visual arts and design, and contemporary music. The programme with the most EFTS, the Bachelor of Arts and Media (Visual Arts and Design), experienced strong course completion and qualification rates in 2011 - 89 and 97 per cent respectively. Course completion rates have remained strong for the three years the degree has been running, and the degree benchmarks strongly against organisation-set targets and sector medians. The lowest performing programme in 2011 was the level 4 Certificate in Arts and Media, and robust analysis has been done on this programme to understand the reasons why achievement did not reach targets. Measures have been put in place to improve achievement. These include reviewing the criteria for entry, improved attendance monitoring, and integrating this cohort more with the students from the other levels. Nevertheless, a positive outcome from this programme was the successful transition for 10 of the students into the Bachelor's degree.

Processes for tracking graduates from across the programmes are improving, and therefore the programme managers were able to demonstrate that their graduates had moved on to further study, were working in the creative industries, and/or were exhibiting locally and nationally. Students and graduates are highly satisfied with their programmes and would recommend them to others. This cluster has a representative industry advisory group which has active input into programme delivery and design. Examples of input include the integration of professional

practice into levels 6 and 7 of the degree and the development of internships that support graduates' pathways to employment.

These programmes are fortunate to have the use of an award-winning, purposebuilt facility. Both staff and students spoke highly of the facility for the range of spaces available and how it is conducive to interdisciplinary contact.

Most staff on this programme are actively involved in the production of the SAR and have a range of mechanisms to ensure they are matching the needs of their stakeholders, including contact with schools and industry, research, surveys, PLATO, and external moderation. There was evidence of information being used to make effective changes, including the development of an open-studio style of teaching and improved connections with local schools.

#### 2.5 Focus area: Business Administration Cluster

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

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

Table 2: Course completion and qualification completion rates for programmes           in business administration, 2009 -2011						
	2009		2010		2011	
	Course Compl. (%)	Qual Compl. (%)	Course Compl. (%)	Qual Compl (%)	Course Compl. (%)	Qual Compl. (%)
Certificate in Bus Admin (Level 2)	57	36	62	59	73	58
Certificate in Bus Admin (Level 3)	70	72	71	71	76	71
Certificate in Bus Admin (Level 4)	84	53	92	77	90	85
National Dip in Bus Admin (Level 5)	NA	NA	NA	NA	82	133

Achievement in this cluster of programmes is high. Course and qualification achievement across levels 3, 4, and 5 is significantly higher than NMIT targets and, for the level 4 and 5 programmes, above sector medians, significantly so for qualification completion. The three years of data also suggest a steady improvement. The causes for lower achievement in the level 2 programme are well understood by both tutors and management, and withdrawals are closely tracked to monitor the reasons. This programme cluster benchmarks its achievement against the National Business Administration Forum and this helps to identify areas of good practice. Approximately 70 per cent of graduates find relevant employment, and employers and graduates testify to the achievement of appropriate technical and work-ready skills. Other value is indicated by ongoing and repeated requests for work experience students from the 69 Nelson and Marlborough businesses that support the programme with work placement opportunities. It was also noted that graduates share their learning by providing training to other employees in their workplace. This programme area has strong industry links which are fostered by an employment scholarship programme (ESP) to train people currently in work. Currently, 63 businesses in Nelson Marlborough require their new employees to be trained through the ESP programme.

Strong self-assessment is a key feature of this cluster. Tutors use a range of indicators to assess their performance, including PLATO feedback and feedback from industry and survey data. There was good evidence of the team using data to make improvements, including the establishment of an assessment centre, ongoing work to embed literacy and numeracy effectively, and the use of learning coaches to guide students through their individual learning plans.

#### 2.6 Focus area: Diploma and Bachelor of Information Technology

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

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

The Diploma in Information Technology is a programme run at the Zhejiang Water Conservancy and Hydropower College in China. A formal partnership with this college enables students to study the diploma in China over three years, with the opportunity to complete the Bachelor of Information Technology at NMIT in their fourth year. NMIT sends tutors to China to teach seven of the diploma courses, the remainder being taught by Chinese tutors to the NMIT course prescription. In 2011, the first cohort of students completed, with a qualification completion rate of 56 per cent. Five of these students have moved to New Zealand to study the degree. This is lower than anticipated. However, anecdotally, a number of the graduates have gone on to study in other English-speaking countries. Retention in the programme has been consistently high, with course completion percentages ranging from the mid-70s into the 90s.

A range of interventions has been put in place to enhance the success of this programme. English language development has been identified as the major issue affecting qualification achievement, and more support has been put in place for learners who are now required to achieve an IELTS (International English Language Testing System) score of 6.0 to be awarded the diploma. Since 2008, 14 English and information technology tutors have come from China for seven weeks professional development at NMIT. NMIT tutors work alongside the Chinese tutors when in China to help improve understanding of Western pedagogy.

This programme continues to be closely monitored and is valued for the opportunities it presents for the Chinese students and also for the experience NMIT is gaining in establishing partnership arrangements in China.

The Bachelor of Information Technology has shown significant improvement in qualification achievement for Student Achievement Component-funded learners, from a low of 31 per cent in 2009 to 62 per cent in 2011. This shift in achievement does not appear to have been formally analysed, although possible reasons for the change have been discussed. The overall achievement rates for learners in this programme in 2011, including internationals, were 78 per cent for course completion and 96 per cent for qualification achievement.

There is high value in this programme, as demonstrated by the graduate survey which revealed that 100 per cent of respondents would recommend the programme to others and that all were employed. This is supported by other anecdotal feedback from graduates and employers. Feedback indicates that students are arriving with the attitudes and knowledge and information technology skills required. While this programme has a range of mechanisms for gathering feedback from industry and learners, a more systematic approach to linking with graduates is being sought.

The programme remains well connected with industry partners, an active advisory group, and relevant associations to ensure that the programme is current and matching the needs of this fast-paced industry. Students are challenged with programmes, including an industry-supported virtualisation training programme and a capstone project that links learners with industry. This programme continues to build research capability and capacity.

#### 2.7 Focus area: Diploma in Viticulture and Wine Production (Level 6)

The rating in this focus area for educational performance is Excellent.

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

Achievement in this Marlborough-based programme is strong, with course completion rates sitting at 78 per cent, which is on the sector median. The small number of international students achieve at the same rate as domestic students. The low qualification completion rate (37 per cent) is partly a factor of more learners studying part-time because of the shift to a blended learning model. In 2011, seven of the nine students eligible to graduate did so, while the remaining two remained employed in industry. Retention rates in this programme are high at 75 per cent. The applied nature of this diploma means that graduates achieve knowledge and skills to be work-ready for employment in vineyards and wineries.

Students on this programme value the articulation agreement with Lincoln University, allowing the students to continue into the third year of a Bachelor's degree in Marlborough. Six of the graduates from 2011 took up this option. While it is acknowledged that more systematic processes could be found to track graduates, the industry in Marlborough is closely connected and a significant number of current students and graduates are employed. Many graduates move to supervisory and management roles on completion of the diploma.

A notable feature of this programme has been the reconfiguration to an online and blended delivery mode. The decision to shift the delivery approach was in response to industry feedback, to better enable learners in work to engage with the programme. With the support of NMIT's flexible learning team, every course has been reviewed and redesigned to enable learners to study from a distance or on campus. The on-campus students say they have benefitted from the shift to online resources as they can easily revise or review material. The use of video, online blogs, and message boards allows students who are working in the field to share practical examples of content being taught. An example includes the sharing of various frost-fighting techniques with students in work.

A highly engaged industry advisory group meets regularly and has direct input into the programme. A recent example of a development that came from this group is the introduction of an organics course. This course was subsequently heavily subscribed and largely taught by industry representatives, including one from the advisory group. Close industry connections are encouraged through the extensive use of industry-based guest tutors and students in work sharing their real-life examples, and through all students participating in a vintage and other work experience opportunities.

#### 2.8 Focus area: Certificate in Professional Hairdressing (Level 3)

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

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

Course and qualification achievement rates for this programme in 2011 were disappointing, with rates sitting at 54 and 51 per cent respectively. These rates were a decrease from previous years. The programme team, with support from the organisation, has analysed this low achievement and a number of strategies have been put in place, including tutor development and reviewing programme delivery. Indications are that achievement will improve for 2012. Students who successfully complete this programme gain entry-level skills that may support them to find work. Unfortunately, the programme has not been systematically collecting outcomes data, and the data that is known presents a picture of patchy outcomes, with graduates finding it hard to get work and only a small number moving into apprenticeships.

The programme recognises a need to connect more strongly with industry. Currently, there is a lack of understanding of what the NMIT programme prepares learners for, and it is perceived that learners do not have a good understanding of the level at which they will enter salon work. The newly refreshed advisory group is active and gives input into the programme, for example for the timing of work placement opportunities. The evaluation team saw evidence of variable results across the two campuses. The Nelson-based programme had a larger number of students than the Blenheim programme and, as a result, was experiencing workload issues. The new tutor at Blenheim, with a smaller group of learners, had implemented standardised teaching and learning strategies, including individual learning plans and professional practice standards. Achievement rates on the Blenheim campus were higher. It was noted that strategies are beginning to be implemented to work towards ensuring consistency of outcomes and improved learner engagement across the two campuses, including regular joint tutor meetings.

The programme team and NMIT's quality management team are aware of issues with this programme, and support has been put in place to develop the team. It is hoped that the tutors' involvement in the writing of the SAR will help give them greater ownership over the actions that are taken to lift student achievement and better match the needs of key stakeholders.

2.9 Focus area: Certificate in Aeronautical Engineering Fundamentals (Level 3); Certificate in Aeronautical Maintenance Engineering (Level 4)

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

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

These programmes attract high numbers of school leavers, predominantly male, and the number of applications exceeds the number of places every year. Both programmes have been extensively redesigned recently. The current level 3 programme has been running for only two years, and the level 4 since the beginning of 2011. The programmes are taught in partnership with RNZAF at Woodbourne, with cohorts of air force recruits participating in the programme alongside NMIT students. The partnership arrangement between RNZAF and NMIT appears to be working well.

The level 3 programme has had strong achievement rates for two years running, with course completions of 92 per cent in 2010 and 97 per cent in 2011. Qualification achievement rates for the two years were 89 and 96 per cent respectively. For the level 4 programme, course completions are between 88 and 100 per cent, although no-one has yet completed the programme. Those who are not succeeding are provided with extra learning support and individual learning plans.

These programmes are valued by learners who continue with study and move to employment. All students who are successful in the level 3 programme move to further study, either with RNZAF as recruits or with NMIT studying the level 4 certificate. A significant number of graduates from the level 4 programme move to relevant employment, and estimates of those in employment in the aviation industry range from 50 to 66 per cent. Over 50 per cent of these graduates take up further study in the Diploma in Aeronautical Maintenance Certification, an in-work qualification that qualifies them for their aviation engineering licence. The programme acknowledges that more could be done to systematically track graduates and better understand the programme's value.

The programme ensures that it matches the needs of industry through its active advisory group and regular contact with the industry training organisation, Aviation, Tourism and Travel Training Organisation, and visits by the programme leader to aviation businesses and sites. Industry has commented on the practical nature of the NMIT training, and companies have been known to contact the programme directly for graduates. Feedback from industry is systematically collected and used to inform programme design and delivery.

A range of teaching approaches is used effectively and students are well supported to achieve. Group work, an aircraft cockpit control simulator, problem-based activities, and case studies are all used to engage learners. The programme has regular tutor meetings and peer observations to support tutor development, and internal moderation processes are followed robustly. The programme is meeting external moderation requirements. Individual learning plans are used with learners who are experiencing difficulties and student support services is available at the Woodbourne site once a week. The programme is well resourced and programme leaders work hard to ensure that learners achieve an industry-relevant qualification.

## Appendix

## Regulatory basis for external evaluation and review

Self-assessment and external evaluation and review are requirements of programme approval and accreditation (under sections 249 and 250 of the Education Act 1989) for all TEOs that are entitled to apply. The requirements are set through the Criteria for Approval and Accreditation of Programmes established by NZQA under section 253(1)(d) and (e) of the Act and published in the Gazette of 28 July 2011 at page 3207. These policies and criteria are deemed, by section 44 of the Education Amendment Act 2011, to be rules made under the new section 253.

In addition, for registered private training establishments, the criteria and policies for their registration require self-assessment and external evaluation and review at an organisational level in addition to the individual programmes they own or provide. These criteria and policies are also deemed, by section 44 of the Education Amendment Act 2011, to be rules made under section 253. Section 233B(1) of the Act requires registered PTEs to comply with these rules.

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 EER process approved by the NZQA Board.

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).

Information relevant to the external evaluation and review process, including the publication Policy and Guidelines for the Conduct of External Evaluation and Review, is available at: <u>http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-</u> <u>evaluation-and-review/policy-and-guidelines-eer/introduction/</u>.

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