

Targeted Evaluation Report

Otago Polytechnic

Date of report: 19 October 2021

Targeted evaluation of [NZIST subsidiary]

Institutes of Technology and Polytechnics (ITPs) became subsidiaries of Te Pūkenga - New Zealand Institute of Skills and Technology as part of the Reform of Vocational Education.

NZQA carries out targeted evaluations of Te Pūkenga subsidiaries whose external evaluation and reviews (EER) became due during the transition to the new organisation.

The targeted evaluations focus on areas of educational performance that will be important for both the subsidiary and Te Pūkenga din the new operating environment.

The limited scope of the targeted evaluation means that it will not result in organisational statements of confidence. Therefore, no EER category status will be assigned.

About Otago Polytechnic

Otago Polytechnic offers over 100 programmes across seven colleges and three campuses from levels 1-9 on the New Zealand Qualifications Framework. Health professional education is a significant part of what Otago Polytechnic offers, accounting for 22 per cent of all the polytechnic's Student Achievement Component (SAC) funding. A significant number of learners come to study at the institution from outside Dunedin. The participation rate of Māori learners is 14 per cent (Māori comprise 8 per cent of the Otago population) and Pasifika is 2 per cent.

Region: Southern Region with regional sites in

Auckland and Cromwell

Location: Main campus in Dunedin

Code of Practice signatory: Yes

Number of students: Domestic in 2019: 4,569 equivalent full-time

students (EFTS) including 420 Māori, 108

International in 2019: 753 equivalent full-time

Pasifika and 2,549 under-25s overall

students (EFTS) and 386 under-25s

Number of staff: 400 full-time equivalent staff including 294

part-time staff

TEO profile: Otago Polytechnic Ltd

Scope of evaluation: This targeted evaluation considered three

focus areas:

1. Learner support – How effectively are

learners supported?

2. Learning assessment design and practice

– How effectively is learning assessed?

Otago Polytechnic nominated the following areas of expertise and strength for review:

• Performance Excellence

Research

 Embedded and aligned strategy – with Māori and sustainability as examples

MoE number: 6013

NZQA reference: C44467

Dates of targeted evaluation: 23-30 November 2020 (online interviews)

Summary of results

Otago Polytechnic is a strategically driven organisation that places its learners first. There is a long-term commitment to equity, support services and continuous improvement. Achieving performance excellence, producing valued research, and engagement with the wider community are also key features of the polytechnic.

- Otago Polytechnic has a demonstrable track record of successfully implementing its strategic goals.
- Otago Polytechnic provides purposeful and authentic academic and pastoral learner support which is assisting learners to achieve well. The polytechnic relies on many channels of feedback to evaluate its effectiveness in guiding and supporting learners and to target resources to the most effective interventions. The quality of the data collected could be improved to enable more robust analysis and understanding of support service effectiveness.
- Otago Polytechnic has a robust policy framework which supports
 assessment practice and reflects the polytechnic's strategic priorities.
 Assessment practices are generally effective and appropriate. Although
 external monitoring in 2018 and 2019 identified some issues that Otago
 Polytechnic itself had overlooked¹, corrective action has since been taken.
 NZQA notes that Otago Polytechnic's achievement of the Baldrigeaffiliated Performance Excellence Study Award² (PESA) in 2018 serves as
 one internationally recognised benchmark of organisational excellence.
- NZQA also notes the value of the internal Performance Excellence Directorate to Otago Polytechnic as a whole. This unit promotes a comprehensive approach to self-assessment across schools and departments.
- The Directorate's achievements include the development of the Performance Excellence Portal. At present, the PEP real-time lead data on

Final

¹ These relate to two programmes at the Otago Polytechnic Auckland International Campus (OPAIC), and the Dunedin delivery of the New Zealand Diploma of Business (Level 5).

² Administered by Business Excellence NZ (endorsed by the American Society of Quality), the award involves rigorous examination by United States-based examiners against seven core Baldrige performance excellence criteria to determine organisational excellence by world-class standards.

learner performance is still being developed and will be shared through the portal due for release ahead of Semester Two 2021.

- Research is a strength of Otago Polytechnic, with its value endorsed by learners, external stakeholders and partners. The polytechnic has a longstanding commitment to applied research and ensuring a strong interface between research and teaching. The polytechnic is effectively promoting the advancement of Māori knowledge and research capability through increased investment and support. The extent and quality of Otago Polytechnic's research outputs are reflected in its strong performance in the 2018 PBRF³ round. Research strategies and operational activities are well supported by appropriate governance and management structures and processes; their effectiveness is reviewed annually as part of the Annual Service Review process.
- Organisational strategic planning is strong. Strategies are cumulative, building on previous experience and lessons learned. Strategies are values based. There is a longstanding commitment to Māori and sustainability and a good understanding of the impact of these strategies at all levels throughout the institution.

³ The purpose of the Performance-Based Research Fund (PBRF) is to ensure that excellent research in the tertiary education sector is encouraged and rewarded. This means assessing the research performance of tertiary education organisations (TEOs) and then funding them on the basis of their performance.

Focus areas

Focus area 1: How effectively are learners supported?

Findings and supporting evidence

Otago Polytechnic strives to put the learner at the centre of all planning and decision-making and provides comprehensive and integrated support systems and services to meet the needs of learners in both central services and the colleges.

The polytechnic also focuses on specific programmes where parity of outcomes is not being achieved, and targeted intervention is needed to close such gaps.

Otago Polytechnic's 'by Māori/for Māori' approach with Te Punaka Ōwheo (Otago Polytechnic's Māori Centre) is effective in providing value-added kaupapa Māori support for Māori learners, and in building social networks and engaging with Māori in their own context. The polytechnic has identified and has begun to address the need to extend learner support systems more effectively outside Dunedin; to work at linkages with other support teams; to do more to strengthen teaching staff capability – especially around Māori cultural capability and priority learners; and is shifting from a reactive to a proactive approach. This is a challenge, not just for resourcing but for ensuring services are fit for purpose.

To meet the challenge, over the last five years the learner services team has doubled in staff numbers to become a group with specialised knowledge of specific needs, but which is already reaching capacity in its ability to provide support. Emphasis has been put on relationships between learner services and the colleges and other service areas to ensure authentic, accessible, integrated and closer interactions between teaching and support staff to support teaching staff to recognise and respond to learner needs. There is evidence that this is occurring and that the needs of the learners are identified early, across sites and delivery modes, and that the interventions offered make a difference. One key initiative in the last four years is the establishment of a separate support team for Māori learners, with a different reporting line to the DCE Māori Development/Kaitohutohu, ensuring strategic alignment, consistency and capability of Māori learner support.

The current learner services team is still coming together and the connectivity of support across sites is not always standard or consistent; many of the support strategies are only being implemented at the Dunedin site. There is an opportunity to improve the connectivity of support provision, information, datasharing and coordination across sites for learner and pastoral support. This is especially the case with learner and pastoral support at the Auckland

International Campus because effective collaboration with the international team was not evident.

Use of learner analytics to understand learners and their needs

A lecturer dashboard/predictive analytics (via the Performance Excellence Portal) to identify learner needs and to see how learners are tracking will soon be available to support staff. Other sources of data include the programme assessment committees and the Student Management System.

A recent change within the learner 'Distressed Learners Flowchart' to accommodate those staff who use it regularly to help better identify the need for the referral of learners has worked well for some schools, although a clearer set of guidelines is required to ensure better use overall.

Meeting needs

Otago Polytechnic is increasing its efforts to capture the learner, and in particular the Māori and Pasifika, voice. Annual reviews, survey feedback and environmental scans enable most learner needs to be effectively met. NZQA interviewed learners who gave examples of the excellent support they had received through online study and assessment with extensions, draft checking and immediate feedback loops and ongoing multi-layered support during COVID-19.

Regular organisational support for practicum and fieldwork placements is effective, with contacts and feedback loops being used with supervisors/learners, and the polytechnic ensuring a triangulation of understanding and support. Capable NZ⁴ is increasingly included in the support offered.

Support policy

Otago Polytechnic has strengthened its guidelines for teaching staff in 2020 to recognise and respond to learner needs, especially those from priority groups. This initiative is also reflected in the allocation of support staff across three campuses for Māori and Pasifika, under-25s, international careers, and those with learning disabilities or challenges. Te Punaka Ōwheo completes an annual Māori Learner Survey, which gathers information from learners and provides a directly Māori learner voice. However, NZQA recommends that further opportunities for gaining information be explored, particularly in the case of Māori and Pasifika learners. This would improve the experiences and address the distinct needs of these priority learner groups.

Support is made available to learners, especially those entering foundation programmes, before and during enrolment process. Most learners reported

Final

⁴ Capable NZ is a subsidiary of Otago Polytechnic which supports learners to gain qualifications that match their life and work experience.

approaching their tutors first and then accessing specialist staff support and resources as necessary.

Self-assessment

Otago Polytechnic has recently launched a draft Pasifika Strategic Framework which provides guidance on improving pastoral care across the campuses for Pacific learners and advice to staff on how they can contribute to this initiative.

An international Code of Practice review in 2020 noted the need for improvements across all three sites; this will be monitored via the Performance Excellence Portal.

There was generally a good response to COVID-19 from the learner support services and other staff, with reflections still ongoing to identify findings and with staff continuing with blended delivery of services (face-to-face and online). Future plans are to align the 'Covid response work' with the business-as-usual work, ensuring that both the online and face-to-face aspects of support are available. A survey of Māori learners since COVID-19 has shown strong evidence of effective connections and support during the lockdown period.

Conclusion

Based on the findings above, NZQA confirms that learner support is authentic and genuine, and there is good evidence of a variety of flexibility and responsiveness to a diverse and distributed learner body, and a willingness to accommodate personal circumstances while still ensuring academic standards around programme design and assessment are maintained. Better sharing of information, interrogation of data and benchmarking across each support area to increase understanding of needs and effectiveness would further improve service provision for the future.

Focus area 2: How effectively is learning assessed?

Findings and supporting evidence

Otago Polytechnic has developed a robust assessment policy. Staff are well supported in designing assessments that are appropriate, varied and reflect Otago Polytechnic's strategic goals. Assessment practice is generally effective and meets stakeholders' needs and expectations.

However, NZQA also notes that external monitoring in 2018 and 2019 identified several examples of inconsistent assessments that Otago Polytechnic's own moderation practices had overlooked. Although in these instances, Otago Polytechnic took quick remedial action, there remain some systemic problems. Currently, the quality of assessment is monitored locally (by the college or school) and there is no full oversight across the institution. This offers Otago Polytechnic an immediate opportunity for process improvement.

To ensure that moderation practices better reflect organisational policy, Otago Polytechnic carried out an internal audit in 2018, the results of which were followed up in 2019. Key improvements arising from this exercise included changes to pre- and post-assessment resources; the embedding of structured moderation plans; and increased internal training in moderation and assessment.

Assessment design and delivery

Teaching staff work directly with subject specialists on assessment design and planning. This ensures the learner assessment load is considered in planning. Incorporating Mātauranga Māori and aspects of sustainability into programme design and assessment is proving to be effective, from the evidence of the particular colleges involved in this targeted evaluation.

The Progamme and Course Design Process (PCDD) ensures the learner is always at the centre. In developing assessments, staff use the learner profile as their primary point of reference, thus enabling the assessment tools and schedule to be better matched with learner needs. In interviews, learners indicated that they found both the assessment load and the timing of the assessments reasonable and fair.

A variety of external relationships were described for designing qualifications/assessments (e.g. Engineering New Zealand) and industry representatives had input into some aspects of assessment (particularly the redeveloped Bachelor of Information Technology). A promising initiative has begun with the embedding of specialist programme design staff in schools (already in Nursing), with positive feedback leading to the expansion of this role and the quality/accessibility of expertise and support.

In response to the COVID-19 lockdowns, Otago Polytechnic implemented appropriate processes to modify assessments to ensure that learners could

continue their studies. The impact of these changes was monitored and, for some programmes, provided useful learnings which have been used to improve ongoing assessment.

Consistency

There is some variability in consistency of assessment across sites – which has caused issues (e.g. Bachelor of Information Technology) – and between programmes. Currently, Capable NZ assessment methodology does not align with the relevant subject holder college, although the inclusion of college staff in the Capable NZ assessment process is being introduced to improve this. There are also some areas of fair and valid quality assessment (e.g. Midwifery, Nursing and Veterinary Nursing) which could be shared as examples of good practice.

Challenges in assessment consistency had been noted at the Auckland and Dunedin sites for some programmes. A more cohesive and aligned approach to team delivery around assessment and moderation has been introduced. While there are some examples of inconsistent assessment, there are also examples of good practice that can be shared.

Conclusion

The individual colleges have oversight of assessment design and quality, and this is generally effective, with good input from external agencies/stakeholders to ensure relevant assessment. The PCDD process ensures alignment with strategic priorities. However, external monitoring identified some issues that Otago Polytechnic was initially not aware of. For these reasons NZQA finds that there is an opportunity to improve consistency through improved institutional oversight and sharing of good practice.

Focus area 3: What are the subsidiary's areas of strength?

3.1 Performance excellence

Findings and supporting evidence

The achievement of the Baldrige-affiliated Performance Excellence Study Award in 2018 serves as one reputable, independent indicator that Otago Polytechnic is progressing well at the whole-of-organisation level. In addition, Otago Polytechnic has developed its own Performance Excellence Portal, which is intended to enhance internal capability-building. In its current form, the portal effectively supports teams by giving them the tools to self-manage (where appropriate), set and monitor goals, and contribute to Otago Polytechnic's strategic priorities.

At present, however, Otago Polytechnic's monitoring of its overall educational performance has limitations. While it can collect and analyse data from the learner achievements over the previous academic year, it cannot yet identify real- time gaps in learner success. Over the period of the targeted evaluation, lecturer and support dashboards were being finalised – with the roll-out ahead of Semester Two, 2021 – to report real-time lead data. This appears a worthwhile technical improvement.

In recent years, Otago Polytechnic has moved to a more collaborative approach to promoting performance excellence. This reflects the mature, evolving and well-developed evaluative tool requiring a major investment of time and commitment by the learners.

What is the value, to learners and other stakeholders or the community?

Otago Polytechnic fosters self-leading teams as a primary enabler of excellence. Some teams are further advanced in some of their activities than others. Otago Polytechnic recognises that there may be occasional inconsistencies in the goals set and that, in some instances, the targets may have been set too low. These are subject to ongoing review. When it appears that extra support is needed, Otago Polytechnic will allocate a Business Improvement Analyst to assist.

Otago Polytechnic is aware that it will continually need to balance initiatives which encourage innovation and a degree of self-management with organisational compliance. It also needs to ensure that when exemplary practice occurs in one place, it is identified and shared across the other teams.

The current version of the Performance Excellence Portal is evolving and thus by definition partial. However, it has already been highly effective in enhancing programme and course design, thereby allowing a quicker response to learner needs. There are also early indications that it has already reduced the cost of preparing annual performance evaluation reports. A lecturer dashboard is planned for roll-out at the start of 2021, and this will include live data, giving an

impetus for increased staff uptake of the resource. In the future, Otago Polytechnic intends that the Portal will hold one integrated source of real-time data. At that point, review, monitoring, planning and goal setting can be more fully aligned with the implementation of whole-of-organisation strategies.

Some challenges remain. There has been no benchmarking against comparable systems run by other Te Pūkenga subsidiaries, and a full cost-benefit analysis has not yet been undertaken. Currently, as indicated above, the analysis made possible by the Portal is largely limited to past performance. A further limitation has been staff uptake, which until now has been limited. Some staff use the tool just to input data, and a few have not in fact used the Portal at all; staff engagement therefore needs to be strengthened.

If these challenges can be adequately addressed, then the Portal offers great potential benefits. More than a database, the Portal has inbuilt planning functionality. It can create and support the self-leading teams that are an essential part of Otago Polytechnic's organisational culture. And it can extend Otago Polytechnic's already strong commitment to organisational excellence.

3.2 Research

Findings and supporting evidence

Otago Polytechnic has had a sustained commitment to and investment in research for over 20 years. This is evidenced by the outputs, plans, activities, funding, publications and events available through the Performance Excellence Portal and the research database. The research strategy and operational activities are well supported and have appropriate governance and management structures/committees and processes in place.

What is the value, to learners and other stakeholders or the community?

There is strong evidence of the high value of this area of strength, with a large portfolio of degrees and postgraduate programmes (including a doctorate), with enrolments representing 57 per cent of EFTS and with research-informed teaching being a priority. Otago Polytechnic is targeting itself to be 80 per cent research-active (i.e. staff generating research outputs and/or engaged in research-related activities). At this time, four of the five colleges have achieved this or are close to achieving it.

Otago Polytechnic has a longstanding commitment to applied research and ensuring a strong interface between research and teaching. The organisation is effectively promoting the advancement of Māori knowledge and research capability through increased investment and support. The strategy and operational activities are well supported, including Māori research with increased outputs and good outcomes in the PBRF, with some noted challenges for Māori staff relating to workload and cultural commitments.

There is an intentional approach to supporting staff research which informs teaching and discipline knowledge, including job descriptions and performance reviews. Otago Polytech's performance compares well with the overall ITP sector by the PBRF metrics.

In 2020 Otago Polytechnic aimed to strengthen further its research capability by setting up a research directorate and reinforcing the linkage between teaching and research across the organisation. Other valued structures to build research already exist: leadership, collaboration, mentoring, commitment and investment. These structures are having some impact and continue to build and strengthen the research culture and capability.

External stakeholders/research partners endorse Otago Polytechnic's research capability and capacity, which is adding significant value to research collaborations and valued outputs and contributions to the local and national community. Stakeholders said the relationship was valuable and allowed Otago Polytechnic's skills, size, and resources to be used and applied to enhance communities.

There is strong evidence of sustained commitment and steady growth in research capability, culture, reputation, and achievement of external funding. Otago Polytechnic has gone from strength to strength through a strategic focus on research, including a united organisational approach to the Māori research strategy (and appropriate investment), to the learner capability framework project and sustainability research.

The research network across the organisation is aligned and active on many levels as evidence of a self-leading culture for the most part. Otago Polytechnic is aware that it will continually need to balance initiatives which encourage innovation and a degree of self-management with organisational compliance. It also needs to ensure that when exemplary practice occurs in one place, it is identified and shared across the other teams. The PBRF and the Average Quality Score provide appropriate measures for assessing performance as well as internal targets and goals to advance the culture and productivity.

Self-assessment is effective as part of the Otago Polytechnic normal review/monitoring process, with a reflective and improvement focus using data to monitor activity and outputs, including accountability for funding. Otago Polytechnic notes it is currently monitoring research funding effectiveness through internal reporting mechanisms, dissemination records, and through researchers' ongoing PBRF quality assurance activities and listing of citations.

The strategy for research is front of mind at Otago Polytechnic, with research activities linked to the strategy. Regular reviews of the strategy show that it has been built on previous useful work and is informing the next iterative step. Otago Polytechnic has a long commitment to collaboration and strengthening applied research in the sector. It is already contributing to a variety of Te

Pūkenga workstreams including the Research Directors' Forum and Rangahau Māori forum. Strong relationships with overseas organisations suggest that Otago Polytechnic is well positioned for collaborative success.

Conclusion

Research is a clear strength at Otago Polytechnic, endorsed by external stakeholders and partners. The strategy and operational activities are well supported, including Māori research producing increased outputs and effective outcomes in the PBRF. Ongoing monitoring of research funding effectiveness would support these outcomes. Otago Polytechnic has extensive research collaborations, including with other ITPs, and is contributing to various Te Pūkenga workstreams. Otago Polytechnic has much to offer the wider network as a leader in applied research.

3.3 Embedded and aligned strategy

Findings and supporting evidence

Otago Polytechnic put forward the examples of both Māori and sustainability⁵ as evidence of the embedding and aligning of their strategy. The evaluators' findings are therefore focused on these two areas.

What is the value, to learners and other stakeholders or the community?

Strategy development, alignment and embedding are planned and sustained approaches to achieving Otago Polytechnic's vision and priorities. The strategy is clearly articulated and communicated across both college and service areas, and there is reliable evidence that change is competently managed.

Otago Polytechnic's strategies are cumulative, building on previous experiences and analyses. Strategies are informed by and aligned to Otago Polytechnic's values and core beliefs, where the learner features at the centre. This allows Otago Polytechnic's strategies to be lived and applied by the learners, rather than existing as purely a policy within a framework.

Otago Polytechnic has reviewed how strategy development and embedding can be improved and is aiming for a more integrated approach across the organisation. NZQA found evidence of the integration of both Māori and sustainability strategies occurring in many areas. Some areas (both academic and support) are not as far along as others in the integration and adoption of

⁵ Sustainability focuses on meeting the needs of the present without compromising the ability of future generations to meet their needs. The concept of sustainability is composed of three pillars: economic, environmental, and social – also known informally as profits, planet and people.

key strategies and goals, and Otago Polytechnic is aware that these areas require more attention.

Sustainability

NZQA finds that Otago Polytechnic has developed a reputation within the community for its commitment to sustainability. This can be seen through a high level of community participation and recognition, notably the Regional Centre of Expertise (RCE) Awarded for sustainability education (from the United Nations University).

Sustainability is monitored through key indicators and focused evaluations. Many sustainability projects were evident to NZQA. All staff interviewed could describe what sustainability meant for them in their context. Examples of embedded sustainable practice in the curriculum, delivery and assessments were given. Learners also outlined how this commitment helped support them in their learning journey.

Similarly, evidence gathered through the Sustainability Strategy example highlighted that:

- Learning design requires the embedding of sustainability into programme delivery and assessments.
- Knowledge and understanding of sustainability as a developing part of teacher pedagogy and as part of the Baldridge philosophy.
- Otago Polytechnic self-evaluates using the RCE rubric on sustainable practice.
- Strong evidence from stakeholders of the presence and focus on sustainability as an embedded approach.

Examples of compelling evidence of the embedding of sustainability include:

- Commitment to building the Te Pā Tauira (Otago Student Village). This is an
 example of the intersection of both Māori and sustainability, where the
 polytechnic opted for sustainability in the build rather than cost-cutting.
 Learners were involved in the build, and ongoing educational visits occur to
 show how sustainable practices are used.
- For Otago Polytechnic's organic waste process, the polytechnic chose the complex (more expensive) route to incorporate sustainable practices to ensure community wellbeing and learner education. Learners were involved in its design and construction, and there are ongoing educational visits.
- Otago Polytechnic has funded a leadership programme for a learner group to meet regularly to build the resilience and sustainability of connection and community.

Based on these rich examples, NZQA can confirm that there is strong objective evidence for the high value that Otago Polytechnic places on its own contributions to sustainability and the esteem in which these are held by many of its key stakeholders.

Māori strategy

Otago has made great efforts to develop and embed its Māori strategy and deliver valued outcomes for Māori learners, and the wider community.

NZQA heard consistent evidence from stakeholders, including from learners themselves, that mātauranga Māori had been appropriately embedded in programme design and delivery.

Through its employment strategy, Otago Polytechnic has appointed Māori to key roles and positions critical to Māori strategic success. This has been supported by a deliberate and visible commitment to the recognition of mana whenua and activity to enhance the relationship. Gathering input from stakeholders is seen as critical to this process.

An opportunity for improvement has been the reporting of the outcomes of the embedding of strategy and SMART⁶ reporting against strategic goals. The Otago Polytechnic Annual Māori Report provides detail on progress made against each of the Māori Strategic Framework priorities, which is presented to mana whenua at the August meeting of the Board each year.

Otago Polytechnic is contributing to Te Pūkenga work on Te Pae Tawhiti, the Te Tiriti o Waitangi Excellence Framework. The effectiveness of this contribution is outside the scope of this targeted evaluation.

Conclusion

Otago Polytechnic has a longstanding and continuous approach to the development and embedding of strategies for its organisation and wider communities. Previous strategies, learnings, successes, and reflection feed the development and embedding of new and advanced goals.

The implementation of strategy to the two areas of principal focus is well planned and comprehensive. Many staff noted that the implementation and embedding of both example areas was evolving. Otago Polytechnic is aware of the need for continual improvement, but the aspiration, strategy and commitment shown by the work done in the areas of sustainability and Māori – via the wider community, industry and regional buy-in – is convincing evidence of the effective embedding and aligning of the strategy.

Final

⁶ SMART = Specific, measurable, achievable, relevant, time-bound

Disclaimer

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

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

- Identify organisational fraud⁷
- Provide comprehensive coverage of all programmes within a TEO, or of all relevant evidence sources
- Predict the outcome of other reviews of the same TEO which, by posing different questions or examining different information, could reasonably arrive at different conclusions.

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⁷ NZQA and the Tertiary Education Commission (TEC) comprehensively monitor risk in the tertiary education sector through a range of other mechanisms. When fraud, or any other serious risk factor, has been confirmed, corrective action is taken as a matter of urgency.