

Targeted Evaluation Report

The Open Polytechnic of New Zealand Limited | Te Kuratini Tuwhera o Aotearoa

Date of report: 16 November 2021

Targeted evaluation of The Open Polytechnic of New Zealand Limited (the Open Polytechnic)

Institutes of Technology and Polytechnics (ITPs) became subsidiaries of Te Pūkenga 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 in 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 the Open Polytechnic

The Open Polytechnic is a specialist open, distance and flexible learning (ODFL) provider of vocational and professional education and training. The Open Polytechnic is headquartered in Lower Hutt, delivering a wide range of disciplines via ODFL to individuals throughout the country and to New Zealanders overseas.

Region: Nationwide delivery

Code of Practice signatory: Yes¹

Number of learners: Domestic: In 2020, 29,364 students – 5885

equivalent full-time students (EFTS) including 4635 Māori students (780 EFTS) and 1769

Pasifika students (312 EFTS)

International: 332 students (67 EFTS)

In 2020, 86 per cent of students were 25 years of age or over and 68 per cent were female.

Number of staff: 471 full-time equivalent staff (330 full-time and

165 part-time)

TEO profile: See The Open Polytechnic of New Zealand Ltd

on the NZQA website

¹ The majority of the Open Polytechnic's international learners are working in New Zealand and undertaking programmes related to that work. The Open Polytechnic and NZQA have agreed that because of this limited scope, the Open Polytechnic is exempt from reporting against several aspects of the Code of Practice, for instance specific clauses in the Marketing and Promotion; Orientation; Insurance; and Safety and Wellbeing sections of the Code.

Scope of evaluation:

This targeted evaluation considered three focus areas:

- 1. Learner support how effectively the Open Polytechnic supports and guides learners.
- 2. Learning assessment design and practice how effectively the Open Polytechnic assesses learning.
- 3. The Open Polytechnic nominated the following two areas of expertise and strength for evaluation:
- The use of analytics to enhance educational performance
- The role of the Open Polytechnic as a national provider of ODFL

MoE number: 6022

NZQA reference: C44466

Dates of targeted evaluation: 15-18 February 2021

Summary of results

Performance is strong in all focus areas. The Open Polytechnic's current effectiveness as a specialist ODFL provider builds on its longstanding experience in this field. The overall success of the Open Polytechnic's strategic mission is indicated by how consistently it performs across the selected focus areas, and by its commitment to learner success within the specific context that is ODFL.

- The effectiveness of the Open Polytechnic's approach to learner support is reflected in strong rates of retention and reported satisfaction.² Specialist support staff are responsive to the needs of learners within an ODFL environment. Detailed data and analysis enable effective scheduled and proactive support to learners. The needs of learners are identified early so that the intervention offered is timely.
- The Open Polytechnic has appropriate academic frameworks, policies and procedures which underpin key aspects of programme design and development, teaching and learning, and assessment. Assessment is specifically designed for the ODFL environment. The recent improvements in the quality and suitability of learner assessment arises from a heightened focus on the application of the learning design framework, and assessment design principles, supported by specialist staff and other resources.
- NZQA finds that Open Polytechnic's use of actionable real-time analytics
 has enhanced its educational performance, and continues to add value.
 Decision-making is based on reliable evidence. For example, analytics has
 identified the most common touchpoints within a learner journey where
 interventions are likely to have the most positive effect on the learner's
 outcomes.
- NZQA agrees that the Open Polytechnic's role as a national provider of ODFL is a unique strength. Within this specific context, the Open Polytechnic achieves success rates that are in line with those of other leading ODFL providers.

² As measured by Net Promoter Score which lacks the granularity of many learner satisfaction surveys.

Focus areas

Focus area 1: How effectively are learners supported?

Findings and supporting evidence

Meeting learner support needs across the organisation

Learners are well supported throughout their journey at the Open Polytechnic by a range of mechanisms, specialist kaimahi and resources, all of which are accessible within the ODFL environment. NZQA notes that while there remains some variability in individual results, in general the Open Polytechnic is successful in responding to the educational and pastoral care needs of its learners.

Before enrolment, comprehensive study information and advice is provided to help learners pursue their chosen pathways. The advisory team at the Student Journey Centre works individually with learners referred for support to ensure they are enrolled in the right course to match their aspirations, skills and capabilities. This first point of contact sometimes remains (by choice) as the primary point of contact for learners.

All new learners receive personalised contact with a specialist mentor who guides them through the onboarding processes. The mentors help set learners up for successful learning by assisting with practical requirements, including access to the internet, a suitable device for online learning, software, etc. They also provide important instruction to learners on finding their way around the online learning platform; using the talk channels to communicate; and where to locate study plans and assessments. In these early conversations, mentors also guide learners to identify their own personal support systems and build independence in learning. Learner mentor interventions are proactive – through the use of analytics learner mentors can know and predict when intervention is required and likely to be most effective.

Once enrolled, learners are well supported in the learning management system (iQualify) by academic staff who are subject matter experts in their field. Learners can communicate directly with academic staff through the public talk channels where they can post questions and see the questions and answers of others. This ensures that individual learning goals are well understood. There are also private talk channels for more one-on-one interaction with academic staff. The academic staff regularly post communications in the talk channel and facilitate interactions among learners, thereby supporting the learners to establish effective social and academic support networks. Feedback from learners, however, indicated that they found iQualify difficult to use as a way of interacting with peers and staff. Stakeholders commented that cohort discussion was difficult when learners were interacting with material at different times.

Māori and Pasifika learners are supported by kaimahi and a specialist team of mentors. This initiative is relatively new and is yet to be rolled out across all programmes. Course completion rates for Māori learners at the Open Polytechnic remain significantly below their peers.

Most international learners at the Open Polytechnic are living and working in New Zealand and studying programmes related to their employment. Support services for these learners is on their specific needs. Based on the interviews and evidence submitted, NZQA found no significant concerns arising from the international Code of Practice.

The implementation of learner support policies and procedures

The Academic Statute provides the academic statutory framework for the Open Polytechnic. The 'tiered learner success' framework also provides a model for the operationalisation of learner support. The Academic Statute sets out the regulatory requirements for staff and learners and, for example, the procedures for applications for extensions for assessments, special consideration, reconsideration of assessment grades, etc, as well as all procedures relating to learner conduct and rights of response.

The Open Polytechnic has developed a tiered learner success model that provides the framework for learner support. The three tiers of learner support complement the in-course teaching and learning provisioned by academic and adjunct staff.

Table 1 - Open Polytechnic Tiered Success Model



Tier 3, driven by data analytics, is an intentional intervention that identifies learners who might benefit from additional long-term support and guidance. Learners with the highest need then receive the highest levels of systematised and personalised intervention.

Tier 2 also driven by data analytics that firstly identify priority courses and then identify exception learners at the critical points of attrition in those priority courses activating a system of targeted personalised interventions.

Tier 1, at the foundation, is a set of tools and resources all learners can access 24/7 based on their own needs and requirements including how to navigate through the iQualify learning management system, study skills resources, a time calculator tool, and essay and assessment writing quides.

A policy for 'Meeting the Needs of Students with Disabilities/Impairments' is currently under review. The Open Polytechnic has evaluated its conformity with the Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice and has developed an action plan. The self-review of the Code was completed and a declaration made to NZQA by the 1 March 2021 deadline.

Future plans and further opportunities

In 2018 the Open Polytechnic, reviewed course completions – particularly those for Māori and Pasifika learners where course completions rates within some programmes were up to 30 per cent below the remainder of their cohort. This resulted in the Lifting Learner Achievement (LLA) initiative. LLA took an enquiry-based, whole-of-organisation approach to evaluation and improvement, focused at programme level. It used data and evidence to inform what was happening for the learner and developed clear action plans and accountabilities for overcoming barriers to learning and responding to the needs of all learners.

In 2018, nine high-volume programmes were selected for a LLA intervention both because of their generally poor performance in 2017, and the particular results of Māori learners within those programmes. In 2019, six new programmes were added to LLA using the same criteria.

The LLA initiative is now in its third annual cycle. There have been measurable increases in learner success for most of the programmes reviewed. Where there have been improvements, they have been across the board.

The tiered learner success model has been in development over the past two years. The Open Polytechnic has recently added a baseline and impact measure report for each intervention. This enables the Open Polytechnic to drill into specific learner groups, specific programmes and courses in order to evaluate the success of each intervention. A review of Tier 1 resources and services is planned for 2021. This will include actions identified in the review of the Education (Pastoral Care of Domestic Tertiary Students) Interim Code of Practice and the Te Pae Tawhiti Excellence Framework of Te Pūkenga.

Learner support in relation to on-job and practicum placements

Learner support during practicum or on-job components is sound and flexible to meet requirements. For example: learners on practicum for the Teacher Refresher Course have a designated associate teacher, and are also supported by the Open Polytechnic's delivery partner for the programme, CORE; learners undertaking practicum for the Bachelor of Social Work (BSW) are each supervised and supported by a registered social worker approved by the ANZASW³ and have formal weekly supervision. Open Polytechnic staff also visit BSW learners on practicum and are available for telephone and email support.

Conclusion

Learners at the Open Polytechnic have access to appropriate academic and pastoral support to achieve their learning goals. Strong pass rates and high rates of learner satisfaction reflect the Open Polytechnic's effectiveness in

³ Aotearoa New Zealand Association of Social Workers

supporting learners. A strong evidential analysis on the need, impact and effectiveness of learner support provision informs ongoing practice, priorities and investment.

Focus area 2: How effectively is learning assessed?

Findings and supporting evidence

Assessment practices are systematically reviewed to ensure that they are properly attuned to the ODFL environment. Legacy gaps in assessment performance have been addressed and improvements are showing a positive impact. Effectiveness in assessing learning is underpinned by comprehensive learning design principles and practices and a fit-for-purpose academic regulatory framework.

The implementation of assessment policies and procedures

Assessment practice is underpinned by an assessment and moderation policy designed to ensure that:

- Assessment encourages effective learning and accurately measures the performance of learners in achieving the outcomes of their courses.
- Assessment design will result in assessments that are clear and equitable and recognise cultural diversity.
- Moderation activities lead to improvements in assessment activities, teaching, and course and learner performance.

This is well guided by operational rules and guidance documents which include:

- Academic Statute
- Moderation Principles and Procedures
- Quality Assurance of Assessment Marking
- Assessment Word Limit Policy (under review).

Effectiveness of internal oversight of assessment (and moderation) plans and practices

The Learning Design and Development Directorate has responsibility for the design of assessments in accordance with the approved programme documentation. Development of assessment is co-led by a subject expert from the programme development team and a learning designer. In addition to ensuring all assessments are valid and reliable, the Open Polytechnic aims to develop assessments that are practical, durable, authentic and contextualised.

The Open Polytechnic is moving to continuous internal moderation. This initiative has already strengthened post-assessment moderation. One driver for this change was Open Polytechnic's own recognition that the amount of internal post-assessment moderation carried out from late 2018 to mid-2020 was insufficient in some programmes.

In addition, between 2017 and 2019 the Open Polytechnic did not meet NZQA external moderation requirements for a number of unit standards. Recurring problems were identified. In some instances, remedial action plans were developed but not implemented, which points to a degree of system failure.

The new approach, with oversight by the dedicated assessment centre, has the potential to ensure that this sort of situation will not be repeated. A summary of the post-assessment moderation activity is submitted monthly to the Academic Quality Assurance Committee. Internal post-assessment moderation is increasingly also informed by the review marking process. Ten per cent of all assessments are reviewed marked prior to results being released and a report provides advice on any required adjustments.

Some improvements are already apparent. For example, a review of the marking process for the Bachelor of Teacher (Early Childhood Education) identified specific areas in one assignment that seemed to be unclear to learners; remedial action was promptly taken.

From the evidence sighted by NZQA, it would appear that if these new processes are fully implemented as intended, assessment is likely to become more consistent.

The quality and suitability of learner assessment

All assessment is designed specifically for ODFL delivery. Most learners expressed satisfaction with the assessment tasks they had been asked to undertake and appreciated that assessment is part of the learning process. The same learners confirmed that they knew clearly what was expected of them in the assessment process (although it should be noted that learner surveys expressed more mixed views on this matter). Assessment information is often posted (in iQualify) in separate talk channels specific to that purpose.

Industry training organisations (ITOs) and regulatory bodies such as the Teaching Council and Social Work Registration Board expressed confidence in the Open Polytechnic's assessment practices.

Academic staff monitor individual learner progress through the iQualify insight information.

How well is assessment built into programme design and delivery?

The quality and suitability of the Open Polytechnic's assessment arises from consistent application of the learning design framework and assessment design principles. This approach requires course designers to draft assessment rubrics to validate the learning outcomes before developing any other delivery material.

For each course, assessment is carefully positioned to occur when the appropriate learning level is likely to have been met. The Open Polytechnic

aims to use initial assessments for learner diagnostic purposes. NZQA found this practice to be the norm.

An example would be in Fire Engineering DE6429 and DE6430, where there are assessment tasks worth 10 per cent of the total credit weighting which require learners to take photographs of examples of fire protection installations and provide appropriate explanations. This ensures that the evidence submitted is unique and quantifiable, as well as ensuring that the underlying skillset is properly articulated.

Assessment in practicums were found to be fair, valid and appropriate and drew on industry expertise, as required. In such cases (e.g. early childhood education), assessment guides provide good direction to industry assessors. The Open Polytechnic uses adjunct assessors who have significant industry involvement and experience for the majority of marking. NZQA recommends that the considerable industry qualification and experience of adjunct assessors could also inform programme development and delivery – they are valuable stakeholders in their own right.

Conformity with regulatory requirements

As discussed earlier in this report, the Open Polytechnic has not met NZQA external post-assessment moderation for a number of unit standards. In 2019, the Open Polytechnic reviewed assessments and assessment schedules to identify areas of weakness. Improvement plans, structural changes and staff development is well underway. Recent moderation monitoring reports – e.g. New Zealand Diploma of Business (Level 5) and the New Zealand Certificate in Financial Services (Level 5) – indicate that improvements are occurring.

External moderation by TITOs has consistently met standards. Likewise, the TCANZ⁴ and ANZASW both indicated that their requirements that adjunct markers/assessors be registered members of, and approved by, their respective organisations had been met.

Conclusion

The Open Polytechnic has a coherent set of organisational policies, structures and operational processes which assure the overall effectiveness of the design and practice of learner assessment which is specifically designed for the ODFL environment.

Day-to-day management of assessment and moderation practice is subject to ongoing monitoring and review. Recent policy reviews, restructuring and assessment-related projects are leading to improved consistency across the Open Polytechnic, and improvement is ongoing in necessary areas.

⁴ Technical Communications Association of New Zealand

Opportunities to better align assessment activities with mātauranga Māori content and learning styles are currently being identified, to further improve the quality and suitability of assessment

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

3.1 The use of analytics to enhance educational performance

Background and rationale for selection

The Open Polytechnic has been proactively devolving its data and analytics capability over almost 10 years. The evidence provided (including attestation from international ODFL experts) supports the Open Polytechnic's contention that its enterprise-level Business Intelligence (BI) solutions in place are sector-leading. The Open Polytechnic also states that it is in fact becoming a leader in learning analytics within New Zealand. However, it is outside the scope of this evaluation for NZQA to express a professional opinion on this latter claim.

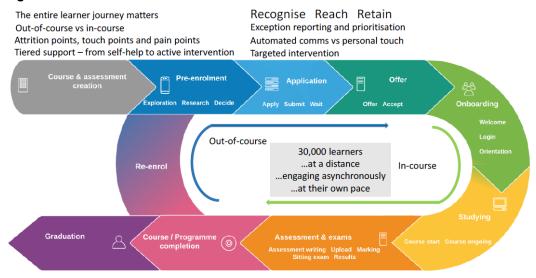
While acknowledging that the work is unfinished, and that there are still challenges, the Open Polytechnic is gradually putting into production a series of analytics concepts and rolling out tools and dashboards for learners, staff and employers. Early results suggest that these have the potential to significantly impact the outcomes of learners, in particular Māori and Pasifika (refer to earlier discussions in this report).

The Open Polytechnic's Transformation Blueprint describes a future state model in which the ideal learner experience is underpinned by:

- An end-to-end approach to removing barriers and increasing learner access along the entire learning journey – in-course and out-of-course
- A tiered model of learner support, which includes 24/7 self-help services for all learners as well as personalised, individualised, exceptions-based responses at different levels for learners who need additional learning and/or pastoral care.

Learners enrol, commence, and then undertake their studies at timing and pace that suits their individuals needs. Because of this the Open Polytechnic has a unique delivery model not based on the tradition annual cohorts of learnings undertaking learning tasks at the same time. This means OP has a heavier reliance of analytical data to monitor the progress of its learners. NZQA confirms that, on the evidence sighted, the Open Polytechnic mode is appropriate for this mode of delivery, and of good quality.

Fig 1. Future State Learner Success Model



Performance

There is clear evidence of the relationship between the development and use of analytics at the Open Polytechnic, as well as improvements in systems, processes and performance. Increasingly, analytics underpin decision-making about strategy, systems development, educational delivery and resourcing. Analytics are used to make real-time, data-based decisions, such as the allocation of learner mentors and ensuring resourcing for programmes is appropriate, e.g. markers and academic staff are in place to meet the needs of increasing learner numbers.

A service model has been developed using analytics to identify touchpoints within a learner journey where intervention is likely to have a positive effect on learner outcomes. The Open Polytechnic staff talked about how analytics have enabled them to 'see the learner', and this has clear benefits in the ODFL context.

The analytics environment at the Open Polytechnic has been designed to be scalable, as the reach and range of courses and learner numbers grow.

Consideration of ethical aspects is strong. Evidence for this is seen throughout the organisation: privacy of information; clear communication with learners about how their information is being used; ethics of using information, e.g. reporting to employers who are paying tuition fees. Staff must complete privacy training.

Development processes have been collaborative and have drawn on sound research and international good practice.

Value

There is definite evidence of value for learners and other stakeholders through improvement in learner engagement and reduction in withdrawals due to interventions based on criteria underpinned by analytics. An example is the introduction of learner mentors in 2018. Mentors were deployed across a pilot of 15 programmes where the majority of learners were known to be new to the Open Polytechnic – on the assumption that those who have not enrolled with the Open Polytechnic before would benefit from additional assistance to understand the ODFL environment. BI solutions were implemented to enable learners to be identified, and lists of targeted learners were generated weekly. This initiative proved the value of the intervention in terms of the percentage of learners logged in and the percentage of learners submitting their first assessment, which showed decreased formal withdrawal.

Table 3 - Impact of onboarding intervention pilot 2018

| | % logged in by end Week 2 | | | % submitted 1st assessment | | | % FWD | | |
|--------------------------|---------------------------|-------------------|---------|----------------------------|-------------------|---------|----------------|-------------------|---------|
| | Baseline | Trial | %-Point | Baseline | Trial | %-Point | Baseline | Trial | %-Point |
| | (Jan - Aug 18) | (Sep 18 - Aug 19) | Impact | (Jan - Aug 18) | (Sep 18 - Aug 19) | Impact | (Jan - Aug 18) | (Sep 18 - Aug 19) | Impact |
| Open Block Programmes | 75% | 89% | 15% | 62% | 88% | 26% | 14% | 7% | -7% |
| Trimesterised Programmes | 86% | 86% | 0% | 74% | 72% | -1% | 12% | 15% | 4% |

Since that early pilot, the use of analytics has become increasingly granulated and sophisticated to enable, for instance, an 'Attrition Model' which has mapped and quantified the key points of attrition along the learner journey, identifying and prioritising those critical touchpoints where intervention and support can influence an outcome.

How might this area of strength be retained or enhanced under Te Pūkenga?

Proactive development has ensured the analytical and ICT tools are well tailored to Open Polytechnic needs. Te Pūkenga might wish to consider if their use could be further extended. Already, the Open Polytechnic has a partnership with Te Wānanga o Aotearoa, which allows this latter provider to use the iQualify platform to enhance delivery. This offers a constructive example of how these tools might work well outside the specific context of the Open Polytechnic's ODFL mandate.

A number of principles have shaped the evolution of the Open Polytechnic's BI capability and its successful integration into every aspect of the organisation to enable data-driven practice and evidence-based decision-making by managers and operational and front-line staff. Te Pūkenga might wish to consider if these principles, which have worked well for the Open Polytechnic, might have some wider applicability.

3.2 The role of the Open Polytechnic as a national provider of ODFL

Background and rationale for selection

The Open Polytechnic is an organisation configured to optimise the design and delivery of digitally enabled, scalable, vocational ODFL.

The Open Polytechnic's ODFL model and pedagogy are distinct from both face-to-face and/or blended provision and from other variants of ODFL evident in other education providers whose core activity is face-to-face delivery. The key distinguishing feature stems from the Open Polytechnic's whole-of-organisation focus on ODFL⁵ and the ODFL learner.

The Open Polytechnic's current model and pedagogy have evolved over the past five years following a significant strategic shift towards a learner-driven approach that is manifested through a flexible, online distance model. This transformation touches all parts of the organisation, and continues to be a work in progress.

Performance

The Open Polytechnic's primary role in the current vocational education and training setting is to ensure nationwide access to flexible lifelong learning for people who want, or need, an alternative to campus-based study. The number of enrolments is increasing. In 2020, the Open Polytechnic enrolled close to 30,000 individual learners, a 30 per cent increase on 2019. Course material and resources are designed specifically for ODFL.

The Open Polytechnic undertakes relevant sector benchmarking, nationally and internationally. From these exercises, leadership at the Open Polytechnic is confident that their course and programme rates compare positively given their ODFL context. The Open Polytechnic is using the data effectively to inform and improve its educational delivery. For example, the national gap (of about 10 percentage points) between intramural and extramural course completion is not unusual, but the Open Polytechnic is nevertheless striving to close that gap. In 2019, the Open Polytechnic course completion was within 6 percentage points of the Te Pūkenga sector average.

Value

The Open Polytechnic serves a distinctive, and large, constituency of learners. The majority of the Open Polytechnic learners are adults aged 25 years or over (86 per cent). Nearly all study part-time (88 per cent) with most in employment (73 per cent). The Open Polytechnic enables nationwide equity of access for

⁵ That said, the Open Polytechnic delivers a small number of programmes (e.g. early childhood education and social work) which, while blended to meet professional practice requirements, are essentially derived from an ODFL foundation.

vocational education and training by providing a range of options to learners who would not normally have the opportunity. Learners have an opportunity to participate in education in their own community at a time which fits their lifestyle and commitments. Learner needs are well understood and supported, and services are flexible to meet the vicissitudes of adult learner life.

Stakeholders at national level appreciate the scale and range of programmes and courses on offer. Giving learners access to the same portfolio of programmes ensures consistency of outcomes, (although some industry representatives stated that they would have preferred to be able to choose between competing providers for ODFL delivery, in an ideal world). Smaller industries are provided with suitable off-job training on a national scale without being tied to a specific location.

The 'any time, any place' delivery is highly valued in most cases, although some programmes see benefits in a cohort-based approach.

The Open Polytechnic has the mandate to deliver ODFL to New Zealanders resident overseas. Increasing numbers of New Zealanders based off-shore want to return home, so holding current New Zealand qualifications is of high value to many in this group and their potential employers.

The Open Polytechnic has demonstrated leadership and value in ODFL during the COVID-19 pandemic by providing ODFL resources, advice and support to face-to-face providers throughout Aotearoa New Zealand, often at no cost, to enable them to continue offering courses to their learners in a blended or an online environment.

How might this area of strength assist Te Pūkenga?

The Open Polytechnic has developed a range of learning design skills, expertise, administration, support, resources and assessment specifically for ODFL. Combined with its analytics capability, the Open Polytechnic has disaggregated elements of learning for quick transfer of information from a direct learning environment to one based on ODFL. For example, these tools could be applied to generic service such as RPL (recognition of prior learning) and credit recognition. They also support business continuity (as in the event of a natural disaster, which might force all providers to some degree of online delivery, as has happened under the current pandemic).

Te Pūkenga will no doubt wish to consider carefully if the Open Polytechnic tools, as described in this report, are best suited to this wider application, and are effectively aligned with Te Pūkenga's larger strategic plans.

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 fraud⁶
- 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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⁶ 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.