



Mana Tohu Mātauranga o Aotearoa  
New Zealand Qualifications Authority

# External Evaluation and Review Report

C4 Group Limited

Date of report: 17 November 2025

# About C4 Group Limited

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*C4 Group Limited (C4) provides security and co-ordinated incident management system training to organisations and individuals throughout New Zealand.*

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Type of organisation:	Private training establishment (PTE)
Location:	25a Short Street, Otumoetai, Tauranga
Eligible to enrol international students:	No
Number of students:	<p>Domestic: as 8 July 2025, 780 students; Māori 6 per cent, Pasifika 3 per cent</p> <p>2024: 2271 students; Māori 10 per cent, Pasifika 4 per cent</p> <p>Students with a disability – numbers have not been collected</p> <p>International: nil</p>
Number of staff:	One full-time staff member, three part-time; two full-time equivalents
TEO profile:	<p><a href="#">C4 Group's provider page</a> on the NZQA website</p> <p>C4 provides short-duration training for the security Certificate of Approval, Co-ordinated Incident Management Systems (CIMS 3 and CIMS 4), and a number of other unit standard or non-unit standard courses related to security. These courses are either fully online or have a small amount of face-to-face time, with the rest of the training being self-directed online. C4 primarily delivers to private clients in their workplace, though the PTE still schedules Certificate of Approval public courses in Hamilton, Christchurch and Auckland.</p> <p>Since the previous EER, C4 has shifted its head office from Auckland to Tauranga and downsized the organisation and operation</p>

	significantly. This is in response to impacts from the Covid lockdowns and the rise in competitive training entities.
Last EER outcome:	At 2 June 2021, NZQA was Highly Confident in both C4's educational performance and capability in self-assessment.
Scope of evaluation:	Focus area 1: Security Certificate of Approval training  Focus area 2: New Zealand Co-ordinated Incident Management Systems (CIMS) training
MoE number:	7135
NZQA reference:	C62254
Dates of EER visit:	9 and 10 September 2025

# Summary of results

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*C4 students achieve at consistently strong rates and gain high value from the training. Self-assessment identifies and reviews most areas of priority need, and there is evidence that a range of improvements are being made.*

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## **Highly Confident in educational performance**

- Achievement rates overall are consistently strong. Investigation into the reasons for non-completion and achievement data has supported success for the students. Lack of collection and analysis of achievement data for learners with disability effects the depth of understanding available for self-assessment.

## **Confident in capability in self-assessment**

- C4 provides highly valued training outcomes to all stakeholders. The training supports employment but is also of use in family and community situations.
- C4's strong relationships and networks ensure the training incorporates the latest standards and practice. Formal and informal feedback allows C4 to efficiently identify issues and respond effectively with changes to resources, training development and delivery, and ways of supporting students' access to online learning and assessment.
- Students are engaged during training and are ready for assessment. Improved internal moderation processes and positive external moderation assures assessment validity and consistency as well as informing training review.
- Support of students is fit for purpose. Very experienced tutors effectively engage and support the students toward success. C4 uses its annual self-review against the Code of Practice for professional development purposes.
- The organisational purpose and values are clear and embedded in operational matters and decision-making. Academic leadership has become more effective; there is strengthened

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oversight of and use of data to develop the organisation as a whole.

- C4 has compliance management systems that are generally effective for the size of the organisation. All policies and procedures are now documented in the quality management system which undergoes regular review. Processes guide practice which are effective when followed.

# Key evaluation question findings<sup>1</sup>

## 1.1 How well do students achieve?

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>Student achievement has been consistently strong since the previous EER, with the overall completion rate for qualifications, courses and certification falling mainly within the 80<sup>th</sup> and early 90<sup>th</sup> percentiles.<sup>2</sup> C4 achieved this result despite facing several challenges during that timeframe – including Covid lockdowns, changes to the tertiary sector, and increased competition in the sector.<sup>3</sup></p> <p>C4's review of programmes has enabled the PTE to use information effectively to change practice. This positively impacted completions, particularly in the security Certificate of Approval. Comprehensive internal and external moderation results now verify student achievement.</p> <p>Māori, Pasifika and students from other countries achieve completions on par with the New Zealand European students. C4 recognises that the Certificate of Approval programme has a higher incidence of students with learning difficulties and with English as a second language. Relevant student support is strong and fit for purpose – and this support assists these students to achieve consistently at around 90 per cent.</p> <p>C4 recognises that students with learning needs undertake training at the PTE. The PTE does not capture this information upon arrival or enrolment. Consequently, C4 does not have this information for the purposes of self-assessment to understand the parity of achievement for this priority learner group.</p>

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<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.

<sup>2</sup> See Table 1 in Appendix 1.

<sup>3</sup> These challenges are also highly relevant to 1.5, and they are discussed in that section.

	As C4 collects and disaggregates the number of withdrawals (non-completions) and failures for further investigation, the PTE understands the reasons why. Where C4 is able to support completion (such as locking down access to the final assessment until all reading has been completed), this has had a positive impact.
Conclusion:	Achievement rates overall are consistently strong. Investigation into the reasons for non-completion and analysing achievement data has supported success for the students. Lack of collection and analysis around disabled student achievement affects the depth of understanding of achievement for these students (see Recommendations).

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

Performance:	<b>Excellent</b>
Self-assessment:	<b>Excellent</b>
Findings and supporting evidence:	<p>C4 provides highly valued training outcomes to all stakeholders. C4 has extensive networks in the incident management and security industries. This enables C4 to gain up-to-date knowledge on industry needs and developments, and the PTE passes this knowledge on to their stakeholders. End-of-course feedback from students and informal feedback from graduates and workplaces indicates high satisfaction. This feedback is also used to inform prompt review of resources, training delivery and student support.</p> <p>Within the security industry, successful Certificate of Approval training means that security companies gain licensed individuals who can complete a variety of core security roles. Successful training also means graduates gain employment in an industry that needs employees to meet demand. C4 has ongoing provider status with the Ministry of Social Development. This indicates that C4 is successful in improving the employability of unemployed persons. Stakeholders also note that the training has additional benefits for the families and communities of students, through their gaining of skills in conflict management and de-escalation.</p>

	<p>Some companies repeatedly send their employees to gain an understanding of the management of emergencies and incidents (CIMS training). Feedback indicates that C4 overlays each organisation's experiences onto the CIMS framework, and this supports a greater connection to the learning. Graduates gain several skills that are transferable to their daily work, including delegation, teamwork and prioritisation. Stakeholders also reported staff being more confident about knowing what to do in times of emergency.</p> <p>C4 is able to deliver on marae, to Pasifika community groups, and to refugee employment programmes. This displays comfort in delivering and effectiveness in enhancing the wellbeing and opportunities across a wide, diverse demographic.</p>
Conclusion:	C4 provides highly valued training outcomes to all stakeholders. All stakeholders attest to training that supports employment and family and community situations. C4's strong relationships and networks ensure training incorporates the latest standards and practice. C4 uses feedback to make changes to resources, training development, delivery and accessibility of materials.

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

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>As indicated in 1.2, C4 staff and directors have strong industry connections, including membership in industry associations, community and government project groups, along with regular attendance at domestic and international conferences and forums. These connections support the relevance of C4's current training. The connections also support the PTE's planning for further training options, including a short course on the usage of stab-resistant vests.</p> <p>C4 is practised at face-to-face, online and blended modes of course delivery. The PTE is currently training primarily in blended modes only as this best fits the training that is</p>



	<p>being delivered. Stakeholders note that the short face-to-face component of blended courses minimises the impact upon and time away from work.</p> <p>Small chunks of contextualised theoretical and practical learning build knowledge, while enabling repetition of skills and knowledge in a variety of scenarios. Group work, discussion and quizzes support students to remain engaged and test their knowledge and progress, both online and in the classroom. These activities also provide tutors with multiple opportunities to gauge students' capabilities and to respond quickly with additional help or individualised attention as needed.</p> <p>Both NZQA and C4 identified that in the online part of the training, some students appeared to be completing assessments before they were ready. C4 analysed the reasons contributing to this and made changes to ensure students had completed all work before assessing. Limiting the number of re-assessments also had a positive impact on successful completions, as suggested by NZQA moderation feedback.</p> <p>With online assessments, C4 has developed mechanisms to ensure the authenticity of student work. These have proved effective, with only a small number of cheating attempts being identified. C4 has processes in place to address these issues as they arise.</p> <p>During 2022, NZQA monitored the internal moderation processes for the New Zealand Certificate in Security (Level 3). A number of recommendations and requirements were made. C4 has improved its internal moderation processes across all training through annual scheduling, check-marking after every assessment, and establishing a permanent independent moderator. External moderation since 2023 indicates the effectiveness of these new measures. Assessment is now assured to be valid, consistent and aligned with learning outcomes.</p> <p>Moderation findings, regular stakeholder feedback, informal tutor evaluations on courses and delivery, and daily checks on student engagement with online learning tasks support ongoing training review. The PTE makes small changes to further support student engagement and accessibility, including the introduction of new assessment instructions. Annual and more formal review occur as</p>
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	needed and all significant changes are pre-moderated or sent for approval by NZQA.
Conclusion:	Strong, extensive networks and regularly canvassed feedback support ongoing review of training to ensure engagement and accessibility. Students are engaged during training and are ready for assessment. Comprehensive internal and external moderation now assures assessment validity and consistency as well as informing training review.

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

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>As most students are either already employed or are hoping to gain security-based employment, their goals are well understood. Student needs are identified either through workplaces informing C4 of employees' specific needs, or by tutors identifying these needs in class. C4 has appropriate, fit-for-purpose support mechanisms in place to meet such needs.<sup>4</sup> If students need pastoral support beyond what C4 can provide, a range of external services are listed in the handbooks.</p> <p>Information regarding students with a learning needs/disability is not captured for review purposes. C4 could consider a process for proactive gathering of information on learning needs (such as through the enrolment form).</p> <p>After enrolment, students are sent course and student handbooks as well as guides on how to access the online learning activities and assessments. These documents support the students to understand relevant policies and their rights and their responsibilities. In response to feedback – and due to the growing number of English as a second language speakers attending training – the</p>

<sup>4</sup> The support mechanisms used are tuakana-teina type activities or tutors making themselves available for one-on-one support sessions during and after class.

	<p>accessibility of the written text has been improved regularly, with positive results.</p> <p>Small class sizes enable individualised attention and the maximising of students' safety. Scenarios requiring teamwork and problem-solving support an inclusive environment and student networking. Continuous oversight by tutors has proven effective at pinpointing students facing difficulties and responding immediately. Completion of practical exercises supports application of learnt skills and knowledge. Tutors provide feedback to students on their progress and areas for improvement.</p> <p>Stakeholder feedback ratings and comments are analysed, and where areas for improvement are identified, these are actioned promptly. As with the more pictorial instructions for access to online assessment, the changes made are received positively. Feedback also supports the annual Code of Practice review completed by the general manager. The lessons taken from annual reporting have been fed back into improved practices and policies regarding support.</p>
Conclusion:	<p>Support provided to the students is fit for purpose. Students are well informed at enrolment or through accessible documentation. Learning activities and opportunities for individual work with tutors ensures students feel included and create their own networks. Effective use of feedback supports C4's review of the Code, resources and delivery. Capture and analysis of information regarding students with a disability could strengthen self-assessment.</p>

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

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>C4's purpose, mission, values and motto are clear, and these are intrinsic to decision-making across all levels of the organisation. C4's strong relationships with industry and stakeholders enables innovation, oversight of the viability of current training, and a high level of responsiveness to relevant changes. This supports the</p>

	<p>business remaining sustainable despite the challenges they have faced resulting from Covid lockdowns, changes within the tertiary sector and increased competition.</p> <p>Data sitting within the organisation's learning and student management systems is regularly interrogated. This data informs ongoing review of resources, training delivery and student support. Data on disability and learning needs could be captured to support greater understanding of the relevant matters.</p> <p>During 2021 and 2022, management acknowledged that they did not maintain oversight of staff, particularly when working at distance due to Covid. This led to a distinct drop in standards in assessment delivery, which was identified first by NZQA and the relevant workforce development councils. Once brought to the attention of management, remedial actions were immediately instituted regarding staff performance, assessment and moderation practice, and the updating of policies and procedures. From 2023, organisational academic leadership has been effective.</p> <p>C4 is primarily staffed by two directors and two contracted tutorial staff. This organisational structure follows significant downsizing of the PTE and its training offerings.<sup>5</sup> Highly experienced staff have been recruited in line with the PTE's human resources policies. Annual staff-only days, training observations and regular informal conversations between the general manager and tutors ensures professional development needs are recognised and addressed. Staff feel valued as they feel listened to and part of a collaborative team supporting continuous improvement.</p>
Conclusion:	<p>The organisational purpose and values are clear, and these are embedded in operational matters and decision-making. The effectiveness of the academic leadership has improved over time. Management meets with staff regularly to ensure sufficient oversight, usage of data and staff collaboration when making decisions around operations and programmes.</p>

<sup>5</sup> C4 used to deliver first aid training, the New Zealand Certificates in Security (Levels 3 and 4), and the New Zealand Diploma in Security (Level 6) additional to the Certificate of Approval, CIMS and bespoke courses currently delivered.

## 1.6 How effectively are important compliance accountabilities managed?

Performance:	<b>Good</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>NZQA monitoring recommended that changes be made to the quality management system, including updating and capturing practice into policies and procedures. Also, while responding to a complaint in 2021, NZQA noted that the stated process for managing complaints would have been effective if it had been fully followed by the organisation. Changes to the quality management system were completed during 2023 and 2024. Annual reviews by the directors now ensure policies and procedures remain aligned with standards and legislation, and processes also reflect practice within the organisation.</p> <p>Monitoring and managing compliance accountabilities relies on reminders from NZQA, experience running a PTE, and clearly defined processes in the quality management system. This approach is fit for purpose, as indicated by C4's timely submission of attestations and returns, and by the PTE's strong record of reporting all unit standard credits on time since the previous EER.</p> <p>Health and safety policies and processes recognise that most courses are delivered within host organisation's premises. Mechanisms to ensure that host health and safety processes are understood have been updated in response to feedback.</p> <p>C4 has undertaken a number of recognitions of prior learning this year for students wishing to gain the New Zealand Certificate in Security (Level 3). The relevant process sets out clearly what is required, and evidence sighted indicates that the process has been followed closely. Currently, the assessor uses professional judgement based on comprehensive knowledge of the programme assessments and learning outcomes as well as extensive experience with CIMS. NZQA has suggested documenting in the quality management system the equivalency indicators used against each learning outcome,</p>

	<p>for future assessors to ensure a consistency of decision-making.</p> <p>As discussed in 1.4, C4 has used its annual review of responsibilities under the Code of Practice to provide further professional development for staff and the organisation. C4 is reminded to publish alongside their self-review the definitions and annual reporting around formal complaints and critical incidents.</p>
Conclusion:	<p>C4 has compliance management systems that are generally effective for the size of the organisation. All policies and procedures are now documented in the quality management system which undergoes review regularly. Processes guide practice which are effective when followed.</p>

# Focus areas

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

## 2.1 Security Certificate of Approval training

Performance:	<b>Excellent</b>
Self-assessment:	<b>Good</b>
Findings and supporting evidence:	<p>This course enrolls the largest numbers of students. C4 recognises that the majority of their students are disadvantaged through either needing employment, having learning difficulties, or have English as a second language.<sup>6</sup> Training activities are designed for both online and face-to-face delivery in line with this recognition. Staff have appropriate experience and professional development to ensure appropriate support capability.</p> <p>The rates of achievement have been steadily increasing since the last EER, to now be in the high 80<sup>th</sup> to low 90<sup>th</sup> percentiles overall. C4 relates this to the improvements made to tightening assessment access and limiting the number of reassessments, as well as more prompt learning support intervention. Also, the number of non-completions and failures has reduced.</p> <p>Graduates are entering into either full-time or part-time employment once they receive their licence. Processes effectively ensure C4 reports the credits within four days after assessment, supporting the licensing authority to approve licences promptly.</p> <p>Stakeholders say the one-day, face-to-face aspect of the course is attractive when considering enrolment. This change from fully online was prompted by feedback from the standard-setting body (SSB). Likewise, further change to assessment delivery is being developed, again in response to SSB feedback.</p>

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<sup>6</sup> C4 works with students sent by the Ministry of Social Development and the Red Cross as the Certificate of Approval provides opportunities for employment to long-term unemployed or immigrants.

## 2.2 New Zealand Co-ordinated Incident Management Systems (CIMS) training

Performance:	<b>Excellent</b>
Self-assessment:	<b>Excellent</b>
Findings and supporting evidence:	<p>CIMS training is primarily booked by organisations with a role in emergency response; therefore, most students are employed. C4 works directly with each organisation to understand their roles in emergency response and develop scenarios that have contextual relevance to that organisation and the role it plays in an emergency. Students and their workplaces attest to this being meaningful to their confidence and understanding of the co-ordination roles they will take.</p> <p>Achievement has remained reasonably consistent within the 80<sup>th</sup> percentile. This also means that a number of students are not completing and therefore do not undertake the assessment. C4 has investigated this and understands that the main reasons are people moving roles or employment and no longer needing the training; or people are wanting the knowledge of the CIMS framework, not the unit standards.</p> <p>Students attest to the value of the training, saying the face-to-face practical scenarios build understanding that is repeated in the assignments and assessment.</p>



## Recommendations

*Recommendations are not compulsory but their implementation may improve the quality and effectiveness of the training and education provided by the tertiary education organisation (TEO). They may be referred to in subsequent external evaluation and reviews (EERs) to gauge the effectiveness of the TEO's quality improvements over time.*

NZQA recommends that C4 Group Limited:

- Collect data on students with a disability or learning difference to understand how many students are impacted and how this can contribute to achievement and support programmes and review.
- Develop and document the equivalency indicators for learning outcomes while completing the recognition of the prior learning process to ensure a consistency of decision-making among assessors.

## Requirements

*Requirements relate to the TEO's statutory obligations under legislation that governs their operation. This include NZQA Rules and relevant regulations promulgated by other agencies.*

NZQA requires C4 Group Limited to:

- Publish the definitions for and annually report organisational management of formal complaints and critical incidents as required by Outcome 2, section 13 (f) and Outcome 1, section 10.3(g) respectively of the [Tertiary and International Learners Code of Practice](#).

# Appendix 1

**Table 1. C4 achievement data 2021-25**

		2021				2022				2023				2024				2025			
		NZE	M	P	OE	NZE	M	P	OE	NZE	M	P	OE	NZE	M	P	OE	NZE	M	P	OE
Enr	CIMS3	74	25	4	32	96	18	3	20	80	28	4	21	42	10	2	12	5	2	0	2
	CIMS4	63	20	7	30	30	10	8	15	121	31	5	65	77	19	4	77	30	8	1	30
	COA	850	315	133	1551	655	331	152	1064	416	212	103	1227	450	183	75	1264	220	54	31	686
Com (%)	CIMS3	82	80	82	94	84	83	87	95	87	88	92	97	81	81	93	92	92	87	89	97
	CIMS4	86	85	87	96	90	88	86	93	93	92	96	96	82	82	91	97	96	92	92	95
	COA	93	92	90	91.5	93	94	89	89	96	96	92	93	94	94	94	92	95	96	95	98
Wdn (%)	CIMS3	18	20	18	6	16	17	13	5	13	12	8	3	19	19	7	8	8	13	11	3
	CIMS4	14	15	13	4	10	12	14	7	7	8	4	4	18	18	9	3	4	8	8	5
	COA	7	8	10	8.5	7	6	11	11	4	4	8	7	6	6	6	8	5	4	5	2

Source: C4 provided data collated.

Key: Enr – enrolled, Com – completed, Wdn – withdrawn (not completed) and failed, M – Māori, P – Pasifika, NZE - NZ European, OE – Other ethnicities including immigrants, refugees and international students studying at other higher education institutes. CIMS = Co-ordinated Incident Management System, COA = the security Certificate of Approval.

# Appendix 2

## Conduct of external evaluation and review

*All external evaluation and reviews are conducted in accordance with NZQA's published rules. The methodology used is described in the web document <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>. 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.*

## Disclaimer

*The findings in this report have been reached by means of a standard 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 fraud<sup>7</sup>*
- *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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<sup>7</sup> 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.

## Regulatory basis for external evaluation and review

*External evaluation and review is conducted under the Quality Assurance (including External Evaluation and Review (EER)) Rules 2022, which are made by NZQA under section 452(1)(t) of the Education and Training Act 2020 and approved by the NZQA Board and the Minister of Education.*

*Self-assessment and participation and cooperation in external evaluation and review are requirements for:*

- maintaining accreditation to provide an approved programme for all TEOs other than universities, and*
- maintaining consent to assess against standards on the Directory of Assessment Standards for all TEOs excluding universities, and*
- maintaining micro-credential approval for all TEOs other than universities.*

*The requirements for participation and cooperation are set through the Programme Approval and Accreditation Rules 2022, the Consent to Assess Against Standards on the Directory of Assessment and Skill Standards Rules 2022 and the Micro-credential Approval and Accreditation Rules 2022 respectively.*

*In addition, the Private Training Establishment Registration Rules 2022 require registered private training establishments to undertake self-assessment and participate in external evaluation and review as a condition of maintaining registration.*

*NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes, micro-credentials and consents to assess and 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 Quality Assurance (including External Evaluation and Review (EER)) Rules 2022. 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](http://www.nzqa.govt.nz)). All rules cited above are available at <https://www.nzqa.govt.nz/about-us/our-role/legislation/nzqa-rules/>, while information about the conduct and methodology for external evaluation and review can be found at <https://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/>.*

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