

Report of External Evaluation and Review

Imperial College of New Zealand
Limited

Not Yet Confident in educational performance

Not Yet Confident in capability in self-assessment

Date of report: 13 October 2015

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Purpose of this Report

The purpose of this external evaluation and review report is to provide a public statement about the Tertiary Education Organisation's (TEO) educational performance and capability in self-assessment. It forms part of the accountability process required by Government to inform investors, the public, students, prospective students, communities, employers, and other interested parties. It is also intended to be used by the TEO itself for quality improvement purposes.

Introduction

1. TEO in context

Name of TEO:	Imperial College of New Zealand Limited
Type:	Private training establishment (PTE)
Location:	Level 3, Imperial House, 16 Waverley Street, Auckland Central
Delivery sites:	As above
First registered:	14 June 2002
Courses currently delivered:	<ul style="list-style-type: none">• National Diploma in Business (Level 5)• National Diploma in Business (Level 6)• Diploma in Management (Level 7)• Certificate in English• Certificate in English (Advanced) (Level 3)• Preparation for International English Language Testing System (IELTS) examination• Interpreter course (Level 5)
Code of Practice signatory?:	Yes
Number of students:	Domestic: none International: approximately 220 students
Number of staff:	Seven full-time and three part-time staff
Scope of active	In addition to the courses listed above, Imperial

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accreditation:	<p>College of New Zealand Limited (ICNZ) is accredited to deliver:</p> <ul style="list-style-type: none"> Teaching English to Speakers of Other Languages (TESOL) course (Level 4)
Distinctive characteristics:	<p>All enrolments at ICNZ are by international students, 86 per cent of whom are male. Eighty-seven per cent of all students are Indian.</p> <p>The majority of students (approximately 200) are enrolled in the business and management diplomas.</p>
Recent significant changes:	<p>ICNZ received NZQA approval for the Diploma in Management in late 2013, and began delivery in March 2014.</p> <p>In January 2011, Auckland Language School (a small English language provider) was purchased by two Australian residents and renamed Imperial College of New Zealand Limited. ICNZ is part of a larger group which includes two Australian education organisations. Since the change of ownership, the organisation has changed the focus of its educational provision from English language to business studies. ICNZ grew by more than 100 per cent from August 2013 to August 2014.</p>
Previous quality assurance history:	<p>ICNZ did not meet NZQA's national external moderation requirements in 2012 and 2013, and was required to submit action plans in both years. Assessment materials were due to be submitted to NZQA at the time of the external evaluation and review (EER).</p> <p>At the previous EER in 2011, NZQA was confident in the educational performance and capability in self-assessment of Auckland Language School.</p>
Other:	<p>ICNZ has previously accepted a small number of international students under 18 years of age, but has not done so since the beginning of 2014.</p>

2. Scope of external evaluation and review

The following focus areas were agreed for inclusion in the EER:

- Governance, management and strategy – this is a mandatory focus area
- International student support – all learners are international students
- National Diplomas in Business (Levels 5 and 6) – the majority of ICNZ students are enrolled in one of these business programmes.

3. Conduct of external evaluation and review

All external evaluation and reviews are conducted in accordance with NZQA's published policies and procedures. The methodology used is described fully in the web document Policy and Guidelines for the Conduct of External Evaluation and Review available at: <http://www.nzqa.govt.nz/providers-partners/registration-and-accreditation/external-evaluation-and-review/policy-and-guidelines-eer/introduction>. The TEO has an opportunity to comment on the accuracy of this report, and any submissions received are fully considered by NZQA before finalising the report.

The evaluation was conducted over two days by two evaluators. Interviews were conducted with the director/chief executive officer, the principal, four business tutors, the administration manager, three administration and support staff and 15 students. Telephone interviews were conducted with four members of the advisory board, two education agents and six graduates.

A variety of documents were reviewed, including management and academic documentation and meeting minutes, student enrolment and orientation information, achievement information, and graduate destination and alumni data. A sample of student assessments, student files and attendance registers were also reviewed.

Summary of Results

Statement of confidence on educational performance

NZQA is **Not Yet Confident** in the educational performance of **Imperial College of New Zealand Limited**.

The reasons for this judgement are as follows:

- ICNZ reports high rates of qualification completions for students enrolled in the National Diplomas in Business.¹ However, learner achievement data is incomplete (for example, there is no information available on unit standard pass rates) and there are concerns relating to the authenticity of assessments.
- Many ICNZ graduates progress to further study (usually at ICNZ) or gain employment. Two years after graduation, 52 per cent of the 2012 graduates have gained an open-work visa and more relevant employment, which is further evidence of learners achieving valued outcomes. At the time of the EER, there was no feedback from employers as to the usefulness of the qualification.
- ICNZ students are generally satisfied with the programmes, activities and resources. Surveys and monthly meetings with the principal provide opportunities to give feedback. Subsequently, some improvements have been made to facilities and resources, but there is limited evidence of meaningful changes in relation to teaching and learning.
- An active advisory board is offering sound guidance and support to ICNZ, including practical advice on programme development and building staff capability. The group's membership also provides useful linkages to local businesses and other education providers.
- Governance and management of ICNZ are well qualified to provide leadership and are committed to positive outcomes for learners. However, there is evidence that, in the face of rapid growth, ICNZ has not consistently maintained minimum standards or complied with its own quality systems (such as managing student non-attendance and limiting class sizes). Other concerns include inadequate processes for identifying plagiarism.

There is evidence that ICNZ is meeting many learner needs and that some graduates are achieving valued outcomes. However, the reliability of learner achievement information is reduced by important weaknesses in key administrative

¹ More than 94 per cent qualification completion is reported for all intakes that commenced between January 2012 and June 2013, except for the January to June 2013 intake for the National Diploma in Business (Level 6) – six of the nine students enrolled on the diploma have completed to date (67 per cent) and one student has an extension.

and academic processes which mean that NZQA is not yet confident in the educational performance of ICNZ.

Statement of confidence on capability in self-assessment

NZQA is **Not Yet Confident** in the capability in self-assessment of **Imperial College of New Zealand Limited**.

The reasons for this judgement are as follows:

- ICNZ has established some basic processes for collecting information on the most important aspects of its performance and activities. However, the information is variable in quality and processes for analysing and understanding achievement data require strengthening.
- Governance and management review information on qualification completion and employment outcomes data on a six-monthly basis. Apart from some general discussion on the feedback collected from students through surveys and meetings, staff at different levels are not generally involved in self-assessment activities. There is some evidence of the PTE using information to make changes, but it is not always apparent that the impact on students and stakeholders has been evaluated.
- ICNZ has sought expert advice and invested in developing staff capability in relation to assessment and moderation practices, and there is some evidence of improved processes. However, increased confidence in the validity of learner outcomes also depends on the establishment of more reliable methods for detecting plagiarism and managing learner attendance.

NZQA finds that in several key aspects, self-assessment information is not sufficiently comprehensive. Although there is evidence of some effectiveness in using findings to make improvements, further development of ICNZ's capability in self-assessment is required for a confident rating.

Findings²

1.1 How well do learners achieve?

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

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

ICNZ collates and analyses learner achievement data on a six-monthly basis. Table 1 below shows qualification completion and retention rates for students enrolling in 2012 and 2013. No explanation was provided for variations in qualification completions and there is limited evidence of strategies for improvement. ICNZ monitors individual achievement of unit standards but does not analyse overall unit standard pass rates to identify issues or trends. However, the PTE estimates that approximately 60 per cent of passes are as a result of second or third attempts. Learner achievement data is not of sufficient quality or detail, and as a result ICNZ's understanding of educational performance, and ability to use self-assessment information to bring about improvements, is limited.

Table 1. Qualification completion and retention rates for National Diploma in Business (Level 5) and National Diploma in Business (Level 6) at ICNZ, for students enrolled in 2012 and 2013				
	2012		2013	
	Level 5	Level 6	Level 5	Level 6
Total number of students	67 (27+40)*	9 (6+3)	61 (34+27)	55 (9+46)
Qualification completion	27** (100%) 39*** (97.5%)	6 (100%) 3 (100%)	32 (94%) Not available	6 (67%) ³ Not available
Retention ⁴	13** (41%) 39*** (98%) ⁵	N/A	32 (94%) Not available	N/A
* Number for each six-month period (January-June, July-December) ** January-June intake *** July-December intake				

² The findings in this report are derived using a standard process and are based on a targeted sample of the organisation's activities.

³ One student has an extension.

⁴ ICNZ defines retention as students who complete a qualification and then continue on to a higher-level qualification at ICNZ (i.e. in the table, complete the level 5 diploma and progress to the level 6 diploma)

⁵ ICNZ reports that the significant change in retention data reflects changes to New Zealand immigration policy in April 2012; from this date international students required a two-year qualification to gain an open work search visa. If those who graduated prior to April 2012 are excluded, then the retention rate for the January-June cohort is 85 per cent.

Furthermore, the learner achievement data is not reliable in the context of serious concerns identified during the EER. A review of attendance registers revealed multiple examples of serious absenteeism. A review of a sample of assessments also suggested that current measures to detect plagiarism are not effective. Assessments are submitted in hard copy and ICNZ relies on manual identification of plagiarised material. These serious weaknesses mean that ICNZ is not meeting minimum expectations in relation to learner achievement.

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

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

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

The majority of learners are studying at ICNZ in order to gain employment, either in New Zealand or in their home country. ICNZ reports that 52 per cent of the level 5 graduates who first enrolled in 2012 obtained graduate work visas and employment. Forty-two per cent of these graduates progressed to further training (usually level 6 diploma study at ICNZ).⁶ The evaluators noted that most ICNZ students work part-time and that in many cases this employment continues on graduation. However, ICNZ is also monitoring medium-term outcomes and reports that, to date, 12 out of 20 graduates who first enrolled between January and April 2012 have gained employment related to their qualification, and open two-year work visas, which is more credible evidence of the value of the qualification.

ICNZ is supported by an active advisory group which meets regularly and offers practical advice and support, particularly in relation to programme development and staff capability. The group also provides ICNZ governance and management with access to educational expertise and local business knowledge, which is contributing to initiatives designed to improve the outcomes for learners (such as a career development seminar series scheduled for July-December 2014).

ICNZ undertakes graduate destination surveys and showed how feedback from some 2013 graduates had been used to identify improvements. At the time of the EER, ICNZ was gathering feedback from employers on the relevance and utility of the educational provision.

⁶ The number of graduates progressing to further training increased significantly from April 2012 as a result of changes to New Zealand immigration criteria for open work visas.

1.3 How well do programmes and activities match the needs of learners and other stakeholders?

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

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

Students at ICNZ are enrolling in national qualifications in business and management that are designed to prepare them for entry-level employment in New Zealand organisations and/or progression to higher study. In early 2014, ICNZ introduced a work placement into the level 6 Diploma in Business, to increase the opportunities for students to apply their knowledge and skills in a workplace. While students are positive about the initiative, it is too soon for its effectiveness in enhancing learning to have been evaluated. The new Diploma in Management extends the educational pathway for students, including those who wish to progress to degree studies. In these ways, and with the support of the advisory group, ICNZ is improving the relevance of its programmes for learners.

Overall, there is reasonable evidence that the programme design is appropriate, activities are meaningful and relevant, and resources are adequate. Business students have access to twice-weekly business English classes if they require additional support, and learners report that this is useful. Improvements have been made to library resources in response to learner feedback. Classes comprise a mix of lectures, group work and individual study on assignments. The advisory group has encouraged teachers to include presentations and simulated meetings to improve communication and teamwork skills. In 2014, ICNZ clustered unit standards into modules and set specific entry points, which has resulted in a more logical programme design. These are examples of useful improvements. However, the annual programme review process is very limited in scope and value for increasing ICNZ's overall understanding of the effectiveness of the programmes and activities to better meet learner needs.

Although ICNZ states that the classes are limited to 30 students, the evaluators noted evidence that this is exceeded on a regular basis, which places the quality of the learning experience at risk.⁷ Current students and graduates interviewed by the evaluators confirmed that, notwithstanding the large classes, they were regularly given opportunities during class time to ask questions and get additional assistance. ICNZ collects feedback from students via quarterly surveys, and the feedback is discussed at monthly class meetings with the principal. Meeting notes indicate that students are generally reluctant to discuss feedback in this public forum. Apart from improvements to facilities and resources, there is limited evidence of meaningful changes in relation to teaching and learning arising from this process.

⁷ Following the EER, NZQA visited ICNZ and found strong evidence of overcrowding, breaching guidelines set out in the New Zealand Building Code.

1.4 How effective is the teaching?

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

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

Teaching at ICNZ is adequate. Learners are generally positive about the teachers and report that they are very accessible to students and offer additional help. ICNZ has processes to identify and follow up students falling behind. Lesson plans have been required since the beginning of 2014 and are reviewed at the end of each module of delivery. However, the examples sighted were little more than course outcomes. Teachers have significant workloads arising from large classes and a compressed teaching timetable. They report being well supported by management. However, there is little evidence of teachers, either individually or jointly, reflecting on their effectiveness and identifying strategies for improvement.

ICNZ has responded to the outcomes of the NZQA national external moderation in 2012 and 2013, by investing in improving assessment practice and moderation processes. In addition to a professional development programme for teachers on assessment and moderation, an independent advisor has been contracted to undertake all of the pre- and post-assessment moderation. Improved staff capability and processes are beginning to be reflected in more consistent and reliable assessment decisions.⁸

The information provided to students at enrolment includes the policy on cheating and plagiarism. Teachers report that they include instruction on academic writing and referencing in their classes as a matter of course and the principal reinforces the requirements at each monthly student meeting. However, as assignments are submitted in hard copy, ICNZ does not use software to identify plagiarism. Based on a random sample of assessments, the evaluators are not convinced that the current reliance on teachers identifying plagiarism in student work is adequate, which reduces confidence in assessment decisions.

ICNZ governance and management state that they are committed to improving the effectiveness of teachers and are supporting some to complete adult teaching qualifications. Teaching observations and performance appraisals are conducted regularly. However, it is not apparent that these processes are contributing to professional development or improvement plans.

⁸ The 2014 NZQA national external moderation results became available after the site visit and before the EER report was finalised. As at 2 December 2014, ICNZ met the standards for the four assessments submitted.

1.5 How well are learners guided and supported?

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

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

Guidance and support at ICNZ is uneven and in one key area does not meet minimum expectations. ICNZ has clear policies for recording and managing student attendance. However, the evidence suggests that compliance with these policies is inconsistent at best. A sample of 2014 registers revealed a number of instances where students were marked absent for several months, but the warning letter system either had not been initiated at all or not followed through to termination of enrolment.⁹ The scale of the absenteeism, together with evidence that at least one such absentee in the sample completed his diploma in the period, is sufficient to call into question the reliability of learner outcomes.

ICNZ has processes and systems that provide timely study information and advice to students. Key rules and expectations are explained at orientation and in monthly class meetings. Teachers are accessible and offer additional support and assistance to help students adjust to a new learning environment. A process has been established to refer students to the principal for additional guidance in academic or personal matters. Students report that they feel supported and know where to go for help and advice.

However, there is limited self-assessment activity in relation to this key evaluation question apart from the annual review of the Code of Practice for the Pastoral Care of International Students and the review of four-monthly student surveys. There is little other evidence of information being gathered with the purpose of evaluating the effectiveness of guidance and support services to ensure that the well-being needs of learners are being met.

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

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

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

Governance and management of ICNZ are well qualified to provide leadership and are committed to positive outcomes for learners. An organisational framework has been established since the change of ownership in 2011, which encompasses management, academic and administrative systems and processes. However, there is evidence that, in the face of rapid growth in recent years there has been

⁹ And notification to the Immigration New Zealand.

insufficient control or oversight of critical processes and ICNZ has not maintained minimum standards or complied with its own quality systems. As a result, the quality of the learning experience and the reliability of learner outcomes have been put at risk.

Planning documents and meeting minutes confirm regular discussions between governance, management and staff. There is evidence of an awareness of the need to manage class sizes, and recently additional space has been accessed. However, further action is required to comply with regulatory requirements for teaching environments, including plans to manage over-capacity. Management reports that they monitor student numbers and employ new teachers as required. Evidence of classes of up to 44 students suggests that the recruitment activity has not always kept pace with the growth in student numbers. The concerns identified during the EER confirm that, in some key aspects, governance and management has not adequately managed or responded to change.

Although management and staff meet regularly, there is limited evidence of staff at all levels contributing to review processes in relation to teaching and learning. Further development of capability in self-assessment is required to strengthen the key processes that underpin educational provision and to improve ICNZ's understanding of educational performance in order to develop improvements that benefit students and stakeholders.

Focus Areas

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

2.1 Focus area: Governance, management and strategy

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

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

2.2 Focus area: International students

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

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

2.3 Focus area: National Diplomas in Business (Levels 5 and 6)

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

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

Recommendations

NZQA recommends that ICNZ:

- Governance and management review processes for managing the impact of growth on the quality of teaching and learning
- Urgently take steps to ensure the attendance policy is being implemented and that appropriate management oversight is established of the process
- Review options for strengthening the detection of academic misconduct, in particular plagiarism, and implement improved processes as a high priority
- Continue to build staff capability in relation to assessment and moderation
- Improve the collation and analysis of learner outcomes, to increase ICNZ's understanding of educational performance and learner outcomes
- Ensure staff at all levels are actively involved in self-assessment activities, including systematically reflecting on the effectiveness of teaching and support activities and identifying strategies for improvement
- Ensures staff at all levels are regularly trained and updated on the requirements of the Code of Practice, in order to improve compliance.

Appendix

Regulatory basis for external evaluation and review

External evaluation and review is conducted according to the External Evaluation and Review (EER) Rules 2013, which are made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

Self-assessment and participation in external evaluation and review are requirements for maintaining accreditation to provide an approved programme for all TEOs other than universities. The requirements are set through the NZQF Programme Approval and Accreditation Rules 2013, which are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

In addition, the Private Training Establishment Registration Rules 2013 require registered private training establishments to undertake self-assessment and participate in external evaluation and review, in accordance with the External Evaluation and Review Rules (EER) 2013, as a condition of maintaining registration. The Private Training Establishment Registration Rules 2013 are also made by NZQA under section 253 of the Education Act 1989 and approved by the NZQA Board and the Minister for Tertiary Education, Skills and Employment.

NZQA is responsible for ensuring non-university TEOs continue to comply with the rules after the initial granting of approval and accreditation of programmes and/or registration. The New Zealand Vice-Chancellors' Committee (NZVCC) has statutory responsibility for compliance by universities.

This report reflects the findings and conclusions of the external evaluation and review process, conducted according to the External Evaluation and Review (EER) Rules 2013.

The report identifies strengths and areas for improvement in terms of the organisation's educational performance and capability in self-assessment.

External evaluation and review reports are one contributing piece of information in determining future funding decisions where the organisation is a funded TEO subject to an investment plan agreed with the Tertiary Education Commission.

External evaluation and review reports are public information and are available from the NZQA website (www.nzqa.govt.nz).

The External Evaluation and Review (EER) Rules 2013 are available at <http://www.nzqa.govt.nz/assets/About-us/Our-role/Rules/EER-Rules.pdf>, while information about the conduct and methodology for external evaluation and review can be found at <http://www.nzqa.govt.nz/providers-partners/external-evaluation-and-review/policy-and-guidelines-eer/introduction/>.

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